

Social and Labor Convergence Program (SLCP) Verification Protocol Version 1.5-1.1*

2 December 2022

This Verification Protocol applies to Version 1.5 of the Converged Assessment Framework.

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

Sections 3-5 provide a list of mandatory requirements for each SLCP Validation Method (onsite, virtual + onsite, full virtual) that Verifier Bodies/ Verifiers must follow. The added guidance to the requirements provides a thorough explanation of each mandatory requirement along with some examples, recommendations or links to examples and/or support documents.

Disclaimer: This file represents only one aspect of the
SLCP Converged Assessment Framework (CAF).

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

*Version 1.1 of the Protocol for CAF v1.5

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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 |
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| 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 starts when the Verifier accepts 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 3.1.1. Requirements for Planning the 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 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 Assessor/Verifier Explanation 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 responses 3.3.3.1 Guidance: automated Verification responses | Added reference to new automation feature for v1.4.2 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 automation features. 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. |
| 2022/09/15 | Added “Note” to requirement 3.2.4.5 under 3.2.4. Worker and Management Interview Onsite Verification Requirements | 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 |
| 2022/09/15 | Added recommendation under 3.2.5 Document Review Onsite Verification Requirements | 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. |
| 2022/09/15 | 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 | Point reads: 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 |

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| | workforce is managed” under “3.2.5. Document Review Onsite Verification Requirements” | 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 | 3.2.5.2. Guidance updated to explain circumstance when Verifier must widen sample | 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. |
| 2022/09/15 | New requirement under wage and hours records requirements | 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. |
| 2022/09/15 | Information added to “Situations of Denied Access” under 3.2.6. Document and Photo Attachment Onsite Verification Requirements | Added: <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 | 3.2.6. Document and Photo Attachment Onsite Verification Requirements | 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. |
| 2022/09/15 | Added a note about Verifier intimidation under 3.2.8. Closing Meeting Onsite Verification Requirements | 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 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: <ul style="list-style-type: none"> 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 Assessor/Verifier Explanation 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. <p>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.</p> |
| 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 Assessor/Verifier Explanation 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 “Assessor/Verifier Explanation” 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 Assessor/Verifier Explanation 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. |

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| 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 Assessor/Verifier Explanation 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. Information added under "Handling of Sensitive Information". |
| 2022/11/24 | Versioning | Update CAF Version Version 1.0 of the Protocol for CAF v1.5, hence Version 1.5-1.0 |
| 2022/11/24 | Offline Tool now only available for onsite verification | All reference to the Tool being available to download and complete offline has been modified to clarify that the offline Tool is only available for onsite verification. Virtual + Onsite Verification and Full Virtual Verification must be completed using the online Tool on the AH Platform. |
| 2022/11/24 | Glossary updated | Glossary adapted to include Full Virtual Verification and Worker Engagement elements |
| 2022/11/24 | Acronym list updated | Acronym list adapted to include Full Virtual Verification and Worker Engagement elements |
| 2022/11/24 | Restructuring of Protocol to provide standalone requirement sections for each SLCP Validation Method. | Section 3: Onsite Verification requirements (core requirements) Section 4: Virtual + Onsite Verification requirements (core + virtual requirements) Section 5: Full Virtual Verification (FVV) requirements (Core + Virtual + FVV requirements) |
| 2022/11/24 | Section 1.4: What is new for v1.5? | This section introduces the main elements new to CAF v1.5, specifically: <ul style="list-style-type: none"> • Validation Method Selection • Validation Method Shown to SLCP Data End Users • Relabeling of existing fields in the Tool • New questions added for Verification/ Assessment Details (APSCA Member ID and VERI-19: 1.1) • Country specific questions • Overall change in structure of the Verification Protocol |
| 2022/11/24 | Relabeling of existing fields in the Tool changes all reference to fields in Verification Protocol | Table introduced under 1.4. What is new for CAF v1.5? – "1.3.3. Relabeling of existing fields in the Tool" to show the relabeling of existing fields from v1.4 to v1.5. Changes are also applied throughout document. Changes are: <ul style="list-style-type: none"> • v1.4 "Response" changes to v1.5 "Facility Self/Joint-Assessment Response" • v1.4 "Verification Selection" changes to v1.5 "Assessor/Verifier Selection" • v1.4 "Corrected Response" changes to v1.5 "Assessor/Verifier Response" • v1.4 "Verification Data" changes to v1.5 "Assessor/Verifier Explanation" |
| 2022/11/24 | Section 2: SLCP Verification Process, VB Quality Check | Box added to 2.11.4.to explain the reasons for, and the process involved in requesting an Addendum. |
| 2022/11/24 | 2.13.3 Verifier Feedback | Added: VBs that fail to respond to VOO feedback and inquiries may be subject to their approval status being deactivated. |
| 2022/11/24 | 3.3.1 Onsite Verification: General – requirement 3.3.1.3 | Guidance added to 3.3.1.3 to explain requirements for physical scope of verification regarding workers' housing and dormitories. |
| 2022/11/24 | 3.3.1 General – Core Requirement 3.3.1.6 | Further explanation of triangulation added to guidance and reference link to Verifier Guidance provided for detailed examples of triangulation. |

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| 2022/11/24 | 3.4.3 Report Writing: Assessor/Verifier Selections and Entries – Core Requirement 3.4.3.1 | Two new options added for Assessor/Verifier Selections to replace “Inaccurate” and an explanation of both provided in Guidance: 1. Inaccurate – Incorrect 2. Inaccurate – Misunderstanding |
| 2022/11/24 | 3.4.4 Report Writing: Assessor/Verifier Explanation – requirement 3.4.4.1 | Example of India’s Variance Dearness Allowance (VDA) added in brackets with reference to Verifier Guidance for detailed example. |
| 2022/11/24 | Section 3, 4 and 5 Guidance | “How to read this section” added to the start of all three Validation Method sections so the user can clearly understand how to read each table of requirements. |
| 2022/11/24 | Section 5: Full Virtual Verification | Full Virtual Verification Validation Method added: process and requirements. |
| 2022/11/24 | Annex VI SLCP Code of Conduct | Addition for Competence – Personnel: language capabilities and/or interpreter support that reflects facility workforce |
| 2022/12/02 | Versioning | Update CAF Version Version 1.1 of the Protocol for CAF v1.5, hence Version 1.5-1.1 |
| 2022/12/02 | Correction of mistakes in Annex III COVID-19 – Inclusion of COVID-19 Information in Verified Assessment Report | Question numbers and question text were not updated to new CAF v1.5 numbers and text. This has now been corrected with Version 1.5-1.1 |

Table of Contents

| | | |
|-----------|---|-----------|
| 1. | Introduction..... | 19 |
| 1.1. | Overview of the Converged Assessment Framework (CAF) | 19 |
| 1.2. | Overview of the SLCP Assessment Process..... | 20 |
| 1.3. | The SLCP assessment process..... | 21 |
| 1.4. | What is new for CAF v1.5? | 22 |
| 1.4.1. | Validation Method Selection | 22 |
| 1.4.2. | Validation Method Shown to SLCP Data End Users..... | 22 |
| 1.4.3. | Relabeling of Existing Fields in the Tool..... | 22 |
| 1.4.4. | Verification/Assessment Details Additional Questions | 23 |
| 1.4.5. | Country Specific Questions | 23 |
| 1.4.6. | Structure of the Verification Protocol..... | 24 |
| 1.5. | Structure of the SLCP Verification Protocol | 25 |
| 2. | SLCP Verification Process..... | 26 |
| 2.1. | Overview | 26 |
| 2.2. | Characteristics of an Audit vs. SLCP Verification..... | 26 |
| 2.3. | Details of the SLCP Assessment Process..... | 27 |
| 2.4. | Pre-Onsite/Virtual Verification..... | 34 |
| 2.4.1. | Account Maintenance on Gateway..... | 34 |
| 2.4.2. | Planning the Verification | 34 |
| 2.5. | Assigning a Verifier..... | 35 |
| 2.5.1. | Assigning Person-days..... | 35 |
| 2.5.2. | Calculating Number of Person-days, Interviews and Documents to Review | 35 |
| 2.6. | Review of Self/Joint-Assessment..... | 35 |
| 2.7. | Pre-verification Communication with Facility..... | 36 |
| 2.7.1. | Download Back-up of Data Collection Tool from AH platform | 36 |
| 2.8. | Onsite/Virtual Verification..... | 36 |
| 2.8.1. | Opening Meeting | 36 |
| 2.8.2. | Walkthrough..... | 36 |
| 2.8.3. | Worker and Management Interviews..... | 36 |
| 2.9. | Document Review | 37 |
| 2.9.1. | Document and Photo Attachment..... | 37 |
| 2.9.2. | Pre-closing Meeting | 37 |
| 2.9.3. | Closing Meeting..... | 37 |
| 2.10. | In line with legal requirements | 37 |
| 2.10.1. | Identifying and citing when facility is not in line with legal requirements | 37 |
| 2.10.2. | Tool meaning of “Consult applicable legal requirements” | 38 |
| 2.11. | Law Guidance and Law Overlay | 38 |
| 2.11.1. | “Law Guidance” and Automated Entry of Non-Compliance and Legal Reference..... | 38 |
| 2.12. | Post-Onsite/Virtual Verification | 39 |
| 2.12.1. | Resolving Facility Concerns | 39 |
| 2.12.2. | Report Writing..... | 39 |
| 2.12.3. | “Assessor/Verifier Explanation” | 39 |
| 2.12.4. | VB Quality Check | 39 |
| 2.12.5. | VB Document Retention | 40 |

| | | |
|--------------|--|------------|
| 2.12.6. | Facility Reviews Verified Assessment Report | 40 |
| 2.12.7. | Facility Responds After Review of the Verified Assessment Report..... | 40 |
| 2.12.8. | Raising a Dispute | 41 |
| 2.12.9. | Facility Shares Verified Assessment via the Gateway and/or Accredited Host | 41 |
| 2.13. | Quality Assurance | 41 |
| 2.13.1. | VOO Quality Assurance Procedures for Accepted Verified Assessments..... | 41 |
| 2.13.2. | Post VRF Edits..... | 42 |
| 2.13.3. | Verifier Feedback | 42 |
| 2.14. | Commonly Asked Questions..... | 42 |
| 3. | SLCP Onsite Verification Requirements | 44 |
| 3.1. | How to read this section | 44 |
| 3.2. | Core: Pre-onsite Verification | 46 |
| 3.2.1. | Planning the Verification | 46 |
| 3.2.2. | Assigning a Verifier..... | 48 |
| 3.2.3. | Assigning Person-days..... | 49 |
| 3.2.4. | Calculating Number of Person-days, Interviews and Documents to Review | 50 |
| 3.2.5. | Review of Self/Joint Assessment..... | 53 |
| 3.2.6. | Communication with Facility..... | 55 |
| 3.3. | Core: Onsite Verification..... | 57 |
| 3.3.1. | General..... | 57 |
| 3.3.2. | Opening Meeting | 61 |
| 3.3.3. | Walkthrough..... | 62 |
| 3.3.4. | Worker and Management Interviews..... | 63 |
| 3.3.5. | Document Review | 66 |
| 3.3.6. | Document and Photo Attachments | 68 |
| 3.3.7. | Pre-closing Meeting | 72 |
| 3.3.8. | Closing Meeting..... | 73 |
| 3.4. | Core: Post-onsite Verification..... | 74 |
| 3.4.1. | Addressing Facility Concerns..... | 74 |
| 3.4.2. | Verified Assessment Report Revision | 75 |
| 3.4.3. | Report Writing: Assessor/Verifier Selections and Entries | 76 |
| 3.4.4. | Report Writing: Assessor/Verifier Explanation | 83 |
| 3.4.5. | Report Writing: Verification/Assessment Details | 89 |
| 3.4.6. | VB Quality Check | 90 |
| 3.4.7. | VB Document Retention | 91 |
| 3.4.8. | VRF Edits..... | 91 |
| 3.4.9. | Ethics | 92 |
| 3.4.10. | Reporting issues outside Final Verified Assessment Report..... | 93 |
| 4. | SLCP Virtual + Onsite Verification Requirements | 94 |
| 4.1. | How to read this section | 95 |
| 4.2. | Pre-virtual + Onsite Verification | 97 |
| 4.2.1. | Planning the Verification | 97 |
| 4.2.2. | Assigning a Verifier..... | 101 |
| 4.2.3. | Assigning Person-days..... | 103 |
| 4.2.4. | Calculating Number of Person-days, Interviews and Documents to Review | 105 |
| 4.2.5. | Review of Self/Joint Assessment..... | 108 |
| 4.2.6. | Communication with Facility..... | 110 |
| 4.3. | Virtual + Onsite Verification | 112 |
| 4.3.1. | General..... | 113 |

| | | |
|---|---|------------|
| 4.3.2. | Opening Meeting | 118 |
| 4.3.3. | Walkthrough..... | 120 |
| 4.3.4. | Worker and Management Interviews | 122 |
| 4.3.5. | Document Review | 126 |
| 4.3.6. | Document and Photo Attachment | 131 |
| 4.3.7. | Pre-Closing Meeting | 132 |
| 4.3.8. | Closing Meeting..... | 133 |
| 4.4. | Post-virtual + Onsite Verification..... | 135 |
| 4.4.1. | Addressing Facility Concerns..... | 135 |
| 4.4.2. | Verified Assessment Report Revision | 136 |
| 4.4.3. | Report Writing: Assessor/Verifier Selections and Entries | 137 |
| 4.4.4. | Report Writing: Assessor/Verifier Explanation | 144 |
| 4.4.5. | Report Writing: Verification/Assessment Details | 149 |
| 4.4.6. | VB Quality Check | 151 |
| 4.4.7. | VB Document Retention | 152 |
| 4.4.8. | VRF Edits..... | 153 |
| 4.4.9. | Ethics | 153 |
| 4.4.10. | Reporting issues outside Final Verified Assessment Report..... | 154 |
| 5. | SLCP Full Virtual Verification Requirements..... | 156 |
| 5.1. | How to read this section | 157 |
| 5.2. | Pre-FVV Verification | 160 |
| 5.2.1. | Confirming the Facility's Eligibility for Full Virtual Verification | 160 |
| 5.2.2. | Planning the Verification | 161 |
| 5.2.3. | Assigning a Verifier | 164 |
| 5.2.4. | Assigning Person-days..... | 165 |
| 5.2.5. | Calculating Number of Person-days, Interviews and Documents to Review | 166 |
| 5.2.6. | Review of Self/Joint Assessment..... | 167 |
| 5.2.7. | Communication with Facility..... | 169 |
| 5.3. | Full Virtual Verification | 173 |
| 5.3.1. | General..... | 173 |
| 5.3.2. | Opening Meeting | 176 |
| 5.3.3. | Walkthrough..... | 177 |
| 5.3.4. | Management Interviews | 178 |
| 5.3.5. | Document Review | 180 |
| 5.3.6. | WE Tech..... | 182 |
| 5.3.7. | Document and Photo Attachments | 185 |
| 5.3.8. | Pre-closing Meeting | 186 |
| 5.3.9. | Closing Meeting..... | 187 |
| 5.4. | Post-FVV Verification..... | 189 |
| 5.4.1. | Addressing Facility Concerns..... | 189 |
| 5.4.2. | Verified Assessment Report Revision | 190 |
| 5.4.3. | Report Writing: Assessor/Verifier Selections and Entries | 191 |
| 5.4.4. | Report Writing: Assessor/Verifier Explanation | 198 |
| 5.4.5. | Report Writing: Verification/Assessment Details | 204 |
| 5.4.6. | VB Quality Check | 205 |
| 5.4.7. | VB Document Retention | 206 |
| 5.4.8. | VRF Edits..... | 206 |
| 5.4.9. | Ethics | 207 |
| 5.4.10. | Reporting issues outside Final Verified Assessment Report..... | 208 |
| Annex..... | | 210 |
| Annex I Professional Conduct | | 211 |

| | |
|---|------------|
| Prohibition on Sales..... | 211 |
| Confidentiality | 211 |
| Impartiality | 211 |
| Respectfulness and Professionalism | 211 |
| Personal Safety | 211 |
| Facility Safety..... | 211 |
| Annex II Filtering of Verifier Body and Verifier..... | 213 |
| Annex III COVID-19 – Inclusion of COVID-19 Information in Verified Assessment Report | 215 |
| Annex IV Verification Communication Template (suggested communication) | 223 |
| Annex V Document List | 225 |
| Factory Profile | 225 |
| Recruitment / Hiring & Termination | 225 |
| Working Hours | 225 |
| Wages & Benefits..... | 226 |
| Worker Treatment & Involvement | 226 |
| Health & Safety | 226 |
| Management Systems..... | 228 |
| Annex VI SLCP Code of Conduct | 229 |
| Conflicts of interest and impartiality | 229 |
| Corruption | 229 |
| Integrity..... | 229 |
| Confidentiality | 229 |
| Competence..... | 229 |
| Personnel..... | 229 |
| Supervision | 229 |
| Verified Assessment Data and Records..... | 229 |
| Report Generation and Submission | 229 |
| Supporting Documents | 229 |
| Handling of Sensitive Information | 229 |
| Record Management..... | 229 |
| Obligations to SLCP and VOO | 230 |
| Transparency with SLCP and the Verification Oversight Organization (VOO) | 230 |
| Accountability | 230 |
| Verifiers | 230 |
| Obligations of SLCP and VOO | 230 |
| Privacy and Data Protection..... | 230 |
| Openness..... | 230 |
| Annex VII Additional On-site Verification Information | 231 |
| Walkthrough/ Onsite Observation..... | 231 |
| Worker Interviews..... | 232 |
| Management Interviews..... | 233 |

Table of contents: Boxes

| | |
|---|----|
| Box 1: Audit vs. Verification Defined | 26 |
| Box 2: Changes in workforce, processes, operations due to COVID-19 | 34 |
| Box 3: “More Info” | 40 |
| Box 4: The scope of the VOO | 42 |
| Box 5: Increasing the number of person-days needed for verification | 52 |
| Box 6: What is considered Denied Access? | 70 |
| Box 7: How to address situations of Denied Access | 71 |

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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

[Return to the top.](#)

Glossary

| | |
|---|---|
| Accredited Host | Third party/ external service provider approved by SLCP to store SLCP assessment data on their platform and provide additional data analytics and sharing services to users such as brands, standard holders, and manufacturers. |
| Active Accredited Host | Third party/ external service provider approved by SLCP to 1) provide a technology platform to allow data entry by facilities and Verifiers during the SLCP assessment and verification; 2) store SLCP assessment data on their platform and 3) provide additional data analytics and sharing services to users such as brands, standard holders, and manufacturers. The SLCP process must be completed on one of the Active Accredited Host platforms and the facility can choose which Active Accredited Host platform they want to use. |
| Converged Assessment Framework (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. Protocol (Facility, VB/ Verifier); and 3. Guidance (Facility, Verifier). |
| CAF Assessment Process | The SLCP procedure for implementing the Converged Assessment Framework, starting with self/joint-assessment for facilities, which is then verified by external parties. Verification oversight processes and methodology facilitate data sharing by the facility, Verifier and Accredited Host via the ITC Gateway. |
| Data Collection Tool or “Tool” | Element 1 of the Converged Assessment Framework. The ‘Questionnaire’ used to gather data on working conditions in a facility and used by the Verifier to verify this data. Contains all the assessment questions that a facility must answer through a self/joint-assessment. When completed, includes the answers by the facility and the Verifier. Can be filled in online on an Accredited Host platform or offline (for onsite verification only) via an Excel file downloadable from an Accredited Host. The Worker Engagement Question Set (mandatory for Full Virtual Verification) is a subset of the Data Collection Tool. |
| 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 Self/Joint-Assessment Responses into the Data Collection Tool. |
| Full Virtual Verification (FVV) | The entire SLCP verification is conducted virtually due to situations of force majeure that restrict the ability of the facility to conduct onsite verification activities. |
| FVV Protocol for Facilities | Element 2 of the Converged Assessment Framework. The document that contains the procedures, rules and process requirements for a facility undergoing Full Virtual Verification. |
| ITC Gateway or “Gateway” | The central repository of SLCP verified assessments. All verified assessments are stored safely on a 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: <ol style="list-style-type: none"> 1. Central (and open) resource of Converged Assessment Framework, SLCP process and related information and support material 2. Account Management and unique IDs for facilities, 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. |
| Joint-assessment | Facility contracts outside help to fill in the Data Collection Tool (CAF Element 1). |

| | |
|---|--|
| 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 Assessor/Verifier Explanation gathering. |
| Self-assessment SLCP | Facility alone fills in the Data Collection Tool (CAF Element 1). 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, manages user complaints and investigations, manages confidential/sensitive issue reporting, develops the scoring system for SLCP approved Verifiers and VBs, collects Verifiers' performance data, provides verification support desk for all SLCP system users, gathers feedback from SLCP system users, handles oversight of submitted addendums, and handles dispute resolution between a facility and a Verifier. |
| 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 | Verified facility responses resulting from the CAF Assessment Process are generated into a report in pdf, Excel and html format. The verified assessment is made available to facilities and shareable by facilities on the ITC Gateway. |
| 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. |
| Virtual + Onsite Verification | Some parts of the verification are conducted virtually in addition to onsite verification activities. |
| WE Question Set | The SLCP Worker Engagement Question Set is a subset of the Data Collection Tool. The Question Set consists of 20 questions aimed at supporting the questions in the Data Collection Tool. |
| Worker Engagement Technology Service Provider (WE TSP) | The facility must complete the Worker Engagement Question Set facilitated by one of the SLCP approved Worker Engagement Technology Service Providers. The Question Set is distributed in form of a survey to a target sample of facility workers, completed surveys are automatically uploaded to the service provider, where the anonymous results are aggregated and compiled into an easy-to-read summary report. The report is then disseminated to the facility and the VB/ Verifier by the Service Provider in a standardized format. |

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**Worker Engagement
Technology or
“WE Tech”**

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

[Return to the top.](#)

Acronyms

| | |
|----------------|--|
| AH | Accredited Host |
| APSCA | Association of Professional Social Compliance Auditors |
| ASC | Assessment Completed |
| ASD | Assessment Deleted |
| ASI | Assessment Initiated |
| CAF | Converged Assessment Framework |
| FFC | Fair Factories Clearinghouse |
| FVV | Full Virtual Verification |
| 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 |
| WE | Worker Engagement |
| WE Tech | Worker Engagement Technology |
| WE TSP | Worker Engagement Technology Service Provider |

[Return to the top.](#)

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. |
| Full-time workers | Persons employed by the facility whose normal hours of work are 40-48 regular hours of work per week. |
| Law Overlay | <p>The Tool (offline and online) has information in the section introductions that address international labor standards applicable to that specific section/ sub-section topic. This is Law Guidance specific to international labor standards only.</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 Response.</p> <p>The Final Response is the Facility Self/Joint-Assessment Response if Accurate, or the Assessor/Verifier Response or Assessor/Verifier Explanation 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. If Law Guidance at question level is implemented, then the automatic entry of Non-Compliance and Legal Reference is also implemented. The Law Overlay is both the Law Guidance field (country- and question-specific) and automatic entry of Non-Compliance and Legal Reference together as a package.</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. |
| Part-time workers | 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. |
| 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). |
| Temporary workers | 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). |
| Workers | Persons working on/with the facility's product, ensuring machinery is working to produce product, or directly involved in the operations of the facility. They are non-supervisory, which means no one report to them (if a person is in a supervisory role, e.g., sewing line group leader, they would not be counted as "worker"). Facilities include those involved in production of goods, and also those involved in operations related to the product, e.g., distribution. Examples of "workers" are cutters, sewers, QC, packers, etc. (all workers who contribute to producing the product), boiler workers, mechanics (machine repair persons), electricians and workers who load product onto trucks. |

[Return to the top.](#)

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 Assessor/Verifier Explanation on social and labor conditions in facilities– Executed through AH online platform or through downloadable Excel from AH (available for onsite verification only but online is still recommended) |
| Protocols | <ul style="list-style-type: none">– Verification Protocol: 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– FVV Protocol for Facilities: Facility Protocol for Full Virtual Verification– WE Tech Protocol: Protocol for facilities and Verifiers working with the WE Question Set and SLCP approved service providers. |
| Guidance | <ul style="list-style-type: none">– Facility Guidance: to understand assessment process and complete the self/joint-assessment, includes:– Facility Guide to Virtual + Onsite Verification– Verifier Guidance: to understand how to write the verified assessment report |

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

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.

[Return to the top.](#)

1.2. Overview of the SLCP Assessment Process

Data Collection

| | |
|---------------------------|--|
| Self-assessment | Only the facility is involved in completing the self-assessment |
| Joint assessment | The facility works with external assistance to complete the assessment. This is particularly useful for SMEs that may not have the internal capacity to complete the assessment |
| Online completion | For virtual + onsite verification and Full Virtual Verification, the self/joint-assessment must be carried out online via the AH platform. For onsite verification, this is the recommended method for completing the self/joint-assessment if the facility has a stable internet connection. |
| Offline completion | For onsite verification ONLY, the self/joint-assessment can be carried out via an Excel document downloaded from the Accredited Host (AH). However, 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

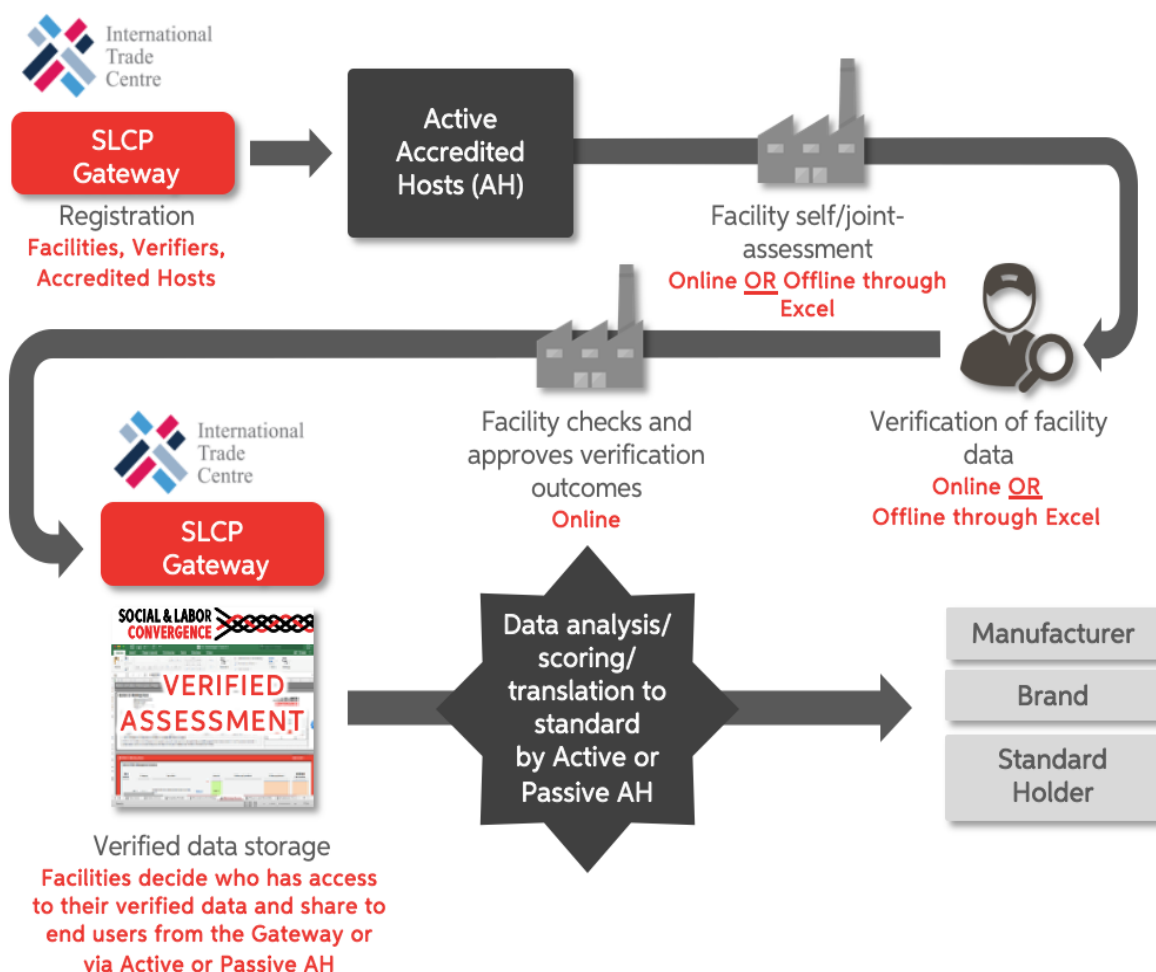
| | |
|--|--|
| Correctness and completeness of facility data | The Verifier will check the correctness and completeness of the data gathered through the Data Collection Tool. They will confirm or provide corrections to the original self/joint-assessment data online on the AH platform or offline via an Excel document downloaded from the AH |
| All questions are verified | <p>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 – Incorrect or Inaccurate – Misunderstanding”/ “Updated during Verification” and other Assessor/ Verifier Selection options in the Data Collection Tool.</p> <p>The Verifier must provide Assessor/Verifier Explanation to support Assessor/ Verifier Responses and is encouraged to provide Assessor/Verifier Explanation for “Accurate” Facility Self/Joint-Assessment Responses where there is a legal non-compliance or a concern relating to general social compliance norms.</p> |
| Verification Oversight (VO) | <p>The Verification Oversight Organization (VOO) oversees the integrity of SLCP verification and ensures the quality of verified assessment data.</p> <p>The objective of Data Verification is to ensure data integrity and the replacement of end-users’ own audit methodologies with the SLCP process.</p> |

Data Hosting and Sharing

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

[Return to the top.](#)

1.3. The SLCP assessment process



Registration The SLCP **process begins with registration** of all active parties on the Gateway.

Active Accredited Host The Active Accredited Host is used to **facilitate the data collection for self/joint-assessment and verification and sharing of verified data**.

Passive Accredited Host 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.](#)

1.4. What is new for CAF v1.5?

1.4.1. Validation Method Selection

At the start of each verification, the Verifier must select the **Validation Method** of the verification (i.e., type of verification activities that will be conducted at the facility). The Validation Method is captured in question **VD-VERI-1**, which must be the first question the Verifier responds to and will determine which further questions are displayed. The Validation Method options available for the Verifier to select on the SLCP Active Accredited Host platform are:

- SLCP Onsite Verification
- SLCP Virtual + Onsite Verification
- SLCP Full Virtual Verification

The answer to the Validation Method question VD-VERI-1 is intended to drive behavior of the Active Accredited Host platform. For example, if SLCP Full Virtual Verification is selected, only a subset of Tool questions will apply for verification, and they will be automatically applied by the Active Accredited Host (See Section 5: SLCP Full Virtual Verification).

Note: The offline Excel Tool is only available to download for Onsite Verification. If the Verifier is conducting an SLCP Virtual + Onsite Verification or Full Virtual Verification, the Verifier must work in the online Tool on the AH platform.

1.4.2. Validation Method Shown to SLCP Data End Users

The **Validation Method** is preset for each question of the Tool based on what the Verifier selects for the Validation Method question **VD-VERI-1** and is shown to the end user in the final verified assessment report. **If the Verifier selects “SLCP Onsite Verification” or “SLCP Full Virtual Verification” the Validation Method is automatically applied for the end user via the AH Platform and the Verifier need not do anything.**

However, **if the Verifier selects “SLCP Virtual + Onsite Verification” the Verifier needs to manually select when a data point is verified virtually.** The default selection for the Validation Method is “SLCP Onsite Verification”; therefore, if the data point is being verified onsite the Verifier need not do anything. Only when the data point is being verified virtually must the Verifier change the selection to “SLCP Virtual Verification”. The Validation Method field appears for each data point in the online Tool for SLCP Virtual + Onsite Verification.

1.4.3. Relabeling of Existing Fields in the Tool

Data fields in CAF v1.5 have been relabeled from that of CAF v1.4. These changes are to increase clarity, and to be more inclusive of Better Work and their use of the term “Assessor” rather than “Verifier”.

Note: No changes to the existing fields have been made to the offline Tool for Verifier use. Only the **Verification Summary in the offline Tool and only the online Tool via the AH Host platform have the field changes.** Since the online Tool is the preferred and recommended version of the Tool for onsite verification, and the only available version of the Tool for Virtual + Onsite and Full Virtual Verification, reference to the new field labels have been made throughout this document.

The changes to v1.5 fields are as follows:

| CAF v1.4 Terminology | CAF v1.5 Terminology |
|-------------------------|---|
| Response | Facility Self/Joint-Assessment Response |
| Verification Selection | Assessor/Verifier Selection |
| Corrected Response | Assessor/Verifier Response |
| Verification Data | Assessor/Verifier Explanation |
| Verification Details | Verification/Assessment Details |
| Final Verified Response | Final Response |

1.4.4. Verification/Assessment Details Additional Questions

In the Verification/ Assessment Details section of the Tool (previously “Verification Details”), two new questions have been added:

1. **APSCA ID:** If the Verifier is an APSCA member they now enter their APSCA Membership ID in Verification/ Assessment Details. The Verifier shall follow the APSCA Code to determine if their Code shall be entered for the applicable verification (e.g., Onsite Verification versus a Full Virtual Verification). SLCP has a strong collaborative relationship with APSCA and highly encourages SLCP approved VBs and Verifiers to be APSCA members, which adds an additional layer of accountability across matters related to ethics and integrity. By having the Verifier record their APSCA member ID in Verification/ Assessment Details, SLCP is better able to monitor any benefits associated with APSCA membership within the context of SLCP.
2. **Unethical Facility Behavior:** If the facility engages in unethical behavior (e.g., fraudulent acts), the Verifier is required to enter details into **Verification/Assessment Observations**, specifically for the question:

“VD-VERI-19: Did the facility engage in behavior that impacts process integrity (e.g., incomplete, inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?”

VD-VERI-19 is part of the final verified assessment report and will be visible to the facility, therefore only confirmed observations must be reported in response to this question. The question is grounded in the SLCP CAF Terms of Use that states, “Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users.” The SLCP Signatory Charter also calls for signatories to “respect the principle of true data in SLCP verified assessments by recording and accepting honest data, and by prioritizing remediation over punishment”. Facilities should thus report actual conditions and be transparent about any non-compliance with applicable legal requirements or facility practices like double bookkeeping.

This new question does not replace, but rather is in addition to, the submission of the [confidential/ sensitive information online form](#). Unlike VD-VERI-19, the online form is not visible to the facility but internal to SLCP and is shared in confidence with applicable approved VBs and Verifiers.

1.4.5. Country Specific Questions

Based on the country that the facility selects in Facility Profile, questions specific to that country will appear elsewhere in the Tool (for Step 1). These country specific questions were introduced to **track compliance against laws that are very country specific** and not applicable to all locations. The following countries and number of questions specific to each country are as follows:

- Bangladesh: 8 questions
- Cambodia: 11 questions
- Ethiopia: 4 questions
- Indonesia: 3 questions

- Pakistan: 1 question
- Vietnam: 15 questions

An example of a country specific question is for workers who are outsourced specifically in Indonesia (RH-EMP-23: Indonesia: Does the facility comply with legal requirements concerning outsourced workers at the workplace?).

[Return to the top.](#)

1.4.6. Structure of the Verification Protocol

The Verification Protocol has been restructured to account for the three SLCP Validation Methods:

- **Section 1: Introduction**
- **Section 2: SLCP Verification Process** – outlines the verification processes for all three SLCP Validation Methods. To be read together with each of the requirement sections depending on the specific SLCP Validation Method being used (e.g., Section 2 + **Section 3**, Section 2 + **Section 4** or Section 2 + **Section 5**)
- **Section 3: SLCP Onsite Verification Requirements** – provides the mandatory requirements that the Verifier must follow for Onsite Verification.
- **Section 4: SLCP Virtual + Onsite Verification Requirements** – provides the mandatory requirements that the Verifier must follow for Virtual + Onsite Verification.
- **Section 5: SLCP Full Virtual Verification Requirements** – provides the mandatory requirements that the Verifier must follow for Full Virtual Verification.

Each section for the three Validation Method **requirements** is presented as a standalone section, **so the Verifier only needs to read the applicable set of requirements for their specific Validation Method along with Section 2 on verification processes (common to all three Validation Methods)**. The requirements for the Validation Methods are also color coded for ease of reference.

See Section 1.5 below for an overview of the revised structure of the Verification Protocol.

[Return to the top.](#)

1.5. Structure of the SLCP Verification Protocol

The SLCP Verification Protocol is divided into five (5) sections:

- | | |
|-------------------------------------|---|
| 1. Introduction | Provides an overview of the SLCP Converged Assessment Framework and the assessment process. |
| 2. SLCP Verification Process | Provides an overview of the different stages involved in the SLCP verification process. Within each stage there are references/ links to the requirements laid out in each Validation Method requirement section. |

Relevant requirements related to the different processes outlined in section 2 are referenced using linked **bold colored** text. These references are linked to each of the relevant sections/ requirements of the three SLCP Validation Methods (**onsite**, **virtual + onsite**, **full virtual**), and are color coded accordingly. You select the color related to your specific Validation Method.

For example:

2.4.2. Planning the Verification

See Requirements **3.2.1, **4.2.1** and **5.2.2****

3.2.1 is linked to the relevant Core requirement 3.2.1 in Section 3: Onsite Verification

4.2.1 is linked to the relevant Virtual requirement 4.2.1 in Section 4: Virtual + Onsite Verification

5.2.2 is linked to the relevant FVV requirement 5.2.2 in Section 5: Full Virtual Verification.

| | |
|---|---|
| 3. SLCP Onsite Verification Requirements | <p>Provides a set of mandatory “Core” requirements for the VB/Verifier to meet to complete the verification process.</p> <p>SLCP onsite Verification Requirements (Core requirements) are color coded dark red as indicated in this table and can be common to all three SLCP Validation Methods (Onsite, Virtual + Onsite, Full Virtual).</p> <p>These requirements are accompanied by must-read guidance and some recommendations to provide support to the VB/Verifier throughout the verification process.</p> |
| 4. SLCP Virtual + Onsite Verification Requirements | <p>Provides a set of mandatory “Virtual” requirements for the VB/Verifier to meet to complete the verification process if virtual activities are included with Onsite Verification.</p> <p>The section consists of Core requirements and requirements specific to Virtual + Onsite Verification. Requirements specific to SLCP Virtual + Onsite Verification are color coded green as indicated here.</p> <p>These requirements are also accompanied by must-read guidance and some recommendations to provide support to the VB/Verifier throughout the Virtual + Onsite Verification process.</p> |
| 5. SLCP Full Virtual Verification Requirements | <p>Provides a set of mandatory “FVV” requirements for the VB/Verifier to meet to complete the verification process if the entire verification is conducted virtually.</p> <p>The section consists of Core requirements, Virtual requirements and requirements specific to Full Virtual Verification. SLCP FVV Requirements are color coded blue as indicated here and are specific to Full Virtual Verification ONLY.</p> <p>These requirements are also accompanied by must-read guidance to provide support to the VB/Verifier throughout the FVV process.</p> |

The SLCP Verification Protocol is an interactive document. Links at the bottom of each section (“Return to the top”) brings you back to the start of the document if you wish to go to another section.

[Return to the top.](#)

2. SLCP Verification Process

2.1. Overview

**What is the SLCP
Verification Protocol?**

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

**What does SLCP
verification do?**

SLCP verification establishes the correctness and completeness of the facility data.

SLCP verification does not determine compliance with a certification or social compliance standard.

SLCP CAF is an agnostic data collection tool (not dependent on a particular standard).

Reporting differs from traditional compliance auditing.

**What terminology
does SLCP use?**

Verification rather than Audit

Verifier rather than Auditor

Box 1: Audit vs. Verification Defined

Audit: A systematic review or assessment of something

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

Source: Oxford University Press

2.2. Characteristics of an Audit vs. SLCP Verification

| Audit | SLCP Verification |
|--|--|
| Inspection by external party (2nd or 3rd party auditor) to assess social and labor conditions | Verification of facility self/joint-assessment of social and labor conditions |
| Pass or fail regarding social and labor compliance requirements | Agnostic data collection without judgment |
| Facility subject to audit process | Facility is active participant in verification process, e.g., by providing facility information upfront |
| Brand owns audit report and Corrective Action Plan | Facility owns verified assessment report (facility permission needed for data sharing) |

[Return to the top.](#)

2.3. Details of the SLCP Assessment Process

This section explains the different statuses, actors and timelines involved in the SLCP assessment process. Table 1 below presents the assessment statuses and what they mean:

Table 1: Statuses of the SLCP Assessment Process

| Status | Description |
|---|---|
| Assessment Initiated (ASI) | Facility has started the self/joint-assessment. They have done this either by downloading the Excel version of the Data Collection Tool from the Accredited Host (AH), or by filling it in online on the AH platform. |
| Assessment Deleted (ASD) | Facility has deleted the self/joint-assessment (including any verification data that has not been finalized yet) and not started a new assessment yet. |
| Assessment Completed (ASC) | Facility has finished the self/joint-assessment and submitted it on the AH platform. |
| Verification in Progress (VRP) | Facility has chosen a Verifier Body (VB) for the on-site verification and the VB has assigned Verifier(s) to the verification. |
| Verification Quality Check (VRQ) | The verified assessment report has been received by the Gateway (sent by the Accredited Host) and is going through an automated quality check (executed by SLCP). |
| Verification being Edited (VRE) | The quality check revealed that some changes need to be made to the verified assessment report. SLCP, the Verification Oversight Organization or the Verifier will make the needed changes before it is sent to the facility for review. |
| Verification Completed (VRC) | Verifier has completed the on-site verification and filled in the findings on the AH platform. The facility will receive a notification of this over e-mail and has 14 calendar days to review. After facility approval or, if the facility does nothing during those 14 days, the assessment status becomes VRF. |
| Verification Finalized (VRF) | Facility has access to their verified assessment report and can share it with end users through the AH platform or Gateway. |
| Verification Disputed (VRD) | <p>If the Facility does not agree with the verified assessment report during the 14-day period, the facility can dispute the verified assessment report and the assessment status is set to VRD.</p> <p>The Verification Oversight Organization (VOO) will review and work with both the facility and Verifier to resolve the dispute. The status will then either be set to VRC (for the Verifier to make agreed adjustments, without the possibility for the facility to dispute again) or to VRF (if the dispute is considered invalid).</p> |
| Verification Invalidated (VRI) | The verified assessment report is considered invalid and can no longer be shared. End users that have already received the report will be notified. The VOO can decide on this status change due to various reasons related to outcomes of Quality Assurance activities. |

[Return to the top.](#)

Table 2 below presents the actors in the SLCP assessment process and their descriptions:

Table 2: Actors in the SLCP Assessment Process

| Actor | Description |
|--|--|
| Facility (F) | Building(s)/ structure(s) that houses the machinery and equipment workers use to produce or process materials. |
| Verifier (V) | A person approved to conduct an SLCP verification, to ensure the completeness and accuracy of the data collected through self-/joint-assessment of facilities. |
| Verifier Body (VB) | The organization for which a Verifier works. |
| Gateway (GW) | <p>The central repository of SLCP verified assessments. All verified assessments are stored safely on this server. The Gateway serves 4 critical functions:</p> <ul style="list-style-type: none"> – Central (and open) resource of the CAF, SLCP process and related information and support material – Account Management and unique IDs for facilities, VBs and Verifiers – Management of statuses of the SLCP assessment cycle via continuous updates by each of the Accredited Hosts. – Re(distribution) of verified assessments (VRF status) to Accredited Hosts and other ad-hoc users, with facility permission. |
| Accredited Host (AH) | 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. |
| Verification Oversight Organization (VOO) | <p>Responsible for the day-to-day management of SLCP verifications. The VOO (core activities):</p> <ul style="list-style-type: none"> – Executes QA activity per the Quality Assurance Manual – Sets Quality Assurance (QA) procedures in collaboration with SLCP – Manages the selection of VBs and Verifiers – Maintains an updated overview of SLCP approved Verifiers and associated VBs on the Gateway – Develops the scoring system for SLCP approved Verifiers and VBs – Collects Verifiers and VBs performance data to inform QA activities – Gathers feedback from SLCP system users and stakeholders – Manages user VRF complaints and investigations – Manages confidential or sensitive information reporting – Handles oversight of facility and VB reviewed addendum submissions – Handles dispute resolution between a facility and a Verifier – Provides verification support desk for all SLCP system users |

[Return to the top.](#)

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Table 3 below presents the status, actors and timeline of each action of the SLCP assessment process:

Table 3: SLCP Statuses, Actors and Timelines in the Assessment Process

| NO. | ACTION | SLCP STATUS | ACTORS | | | | | | ESTIMATED TIMELINE ¹ |
|-----|---|-------------|--------|---|----|----|----|-----|--|
| | | | F | V | VB | GW | AH | VOO | |
| 1. | Facility creates an account on Gateway | | ✓ | ✓ | ✓ | ✓ | | | Week 0 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 |
| 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 | ✓ | | | | ✓ | | |
| 7. | 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 | VRP | | | ✓ | ✓ | | | Week 1 |

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 | |
| | several weeks. | | | | | | | | |
| 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 | | ✓ | | | ✓ | | <p>Typically, no earlier than week 3</p> <p>Typically, no later than week 7</p> <p><u>Note</u> 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.</p> |
| 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, virtual interviews, virtual walk-through) | VRP | ✓ | ✓ | | | | | |
| 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</p> <p>Typically, no later than week 8</p> <p><u>Note</u> 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 - Incorrect” 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/ | VRP | | ✓ | | | ✓ | | |

| NO. | ACTION | SLCP STATUS | ACTORS | | | | | | ESTIMATED TIMELINE ¹ |
|-----|--|----------------|--------|---|----|----|----|-----|---|
| | | | F | V | VB | GW | AH | VOO | |
| | concerns during closing meeting | | | | | | | | |
| 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 | ✓ | ✓ | ✓ | | ✓ | | Typically, no earlier than week 6 Typically, no later than week 10 |
| 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 | | ✓ | | | ✓ | | |
| 18. | VB conducts quality check of 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 Verifier edits. |
| 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 | ✓ | | | | ✓ | | |

| NO. | ACTION | SLCP STATUS | ACTORS | | | | | | ESTIMATED TIMELINE ¹ |
|-----|---|--------------------|--------|---|----|----|----|-----|--|
| | | | F | V | VB | GW | AH | VOO | |
| 22. | Facility reaches out to VB/Verifier directly (offline/email) with any concerns/questions about Assessor/Verifier Explanation. 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 | ✓ | ✓ | ✓ | | ✓ | | Typically, no earlier than week 8 Typically, no later than week 12 |
| 23. | Verifier reviews facility concerns/questions and edits the assessment as agreed. Verifier changes status to VRC so facility can review 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. | VRE then VRC | ✓ | ✓ | | | ✓ | | |
| 24. | Facility changes assessment status to VRF 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 the Dispute process once. | VRD | ✓ | | | ✓ | | ✓ | Typically, no earlier than week 11 Typically, no later than week 15 |
| 27. | If the Dispute is substantiated, depending on the outcome: <ul style="list-style-type: none"> VOO invalidates verified assessment (VOO notifies facility and 4 calendar days later changes to VRI) OR VOO returns assessment to Verifier for edits and final facility review (Verifier and facility have 5 calendar days to make edits and review) | 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 |

| NO. | ACTION | SLCP STATUS | ACTORS | | | | | | ESTIMATED TIMELINE ¹ |
|-----|---|----------------|--------|---|----|----|----|-----|--|
| | | | F | V | VB | GW | AH | VOO | |
| 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> |

[Return to the top.](#)

2.4. Pre-Onsite/Virtual 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. See Sections 3.2, 4.2 and 5.2.

2.4.1. Account Maintenance on Gateway

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

2.4.2. Planning the Verification

See Requirements 3.2.1, 4.2.1 and 5.2.2

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.

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

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

[Return to the top.](#)

Box 2. 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. 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/Assessment 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.

[Return to the top.](#)

2.5. Assigning a Verifier

See Requirements [3.2.2](#), [4.2.2](#), [5.2.3](#)

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. The VB does this on the Gateway where a list of SLCP approved Verifiers is available for selection.

2.5.1. Assigning Person-days

See Requirements [3.2.3](#), [4.2.3](#), [5.2.4](#)

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.

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

See Requirements [3.2.4](#), [4.2.4](#), [5.2.5](#)

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 Tables 4 (onsite), 6 (virtual) or 9 (FVV). These tables clearly explain how many person-days, interviews and documents will be needed depending on the selected Validation Method:

- SLCP Onsite Verification
- SLCP Virtual + Onsite Verification
- SLCP Full Virtual Verification

[Return to the top.](#)

2.6. Review of Self/Joint-Assessment

See Requirements [3.2.5](#), [4.2.5](#), [5.2.6](#)

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.

[Return to the top.](#)

2.7. Pre-verification Communication with Facility

See Requirements **3.2.6**, **4.2.6**, **5.2.7**.

SLCP 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.

2.7.1. 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 Assessor/Verifier Explanation and the Verification Summary in case the Verifier experiences Internet connectivity issues during the onsite verification and cannot access the AH platform.

[Return to the top.](#)

2.8. Onsite/Virtual Verification

See Requirement Sections **3.3**, **4.3**, **5.3**

The Verifier verifies all the Facility Self/Joint-Assessment 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 important to review the Step selection prior to 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 – if the facility did not provide a correct answer, or did not provide an answer at all, the Verifier 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 Verifier and facility.

Reference: See Annex VII for tips concerning the onsite walkthrough, and worker and management interviews.

2.8.1. Opening Meeting

See Requirements **0**, **4.3.2**, **5.3.2**

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, worker engagement committees 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.

2.8.2. Walkthrough

See Requirements **3.3.3**, **4.3.3**, **5.3.3**

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 Assessor/Verifier Explanation entries and any legal non-compliances.

2.8.3. Worker and Management Interviews

See Requirements **3.3.4**, **4.3.4**, **5.3.4** (only management interviews for 5.3.4 (FVV))

The Verifier interviews a sample of workers and all management staff responsible for social and labor activities/policies/procedures at the facility.

[Return to the top.](#)

2.9. Document Review

See Requirements **3.3.5, 4.3.5, 5.3.5**

The Verifier conducts document review of policies and procedures as well as records such as wages and working hours, employment records, formal complaints, etc.

IMPORTANT: The Facility Profile Gateway data will be updated with the final verified data. As a result, the facility name, address, business license and OAR/OS ID could all potentially change.

Therefore, the Verifier must check and verify the facility data, especially the OAR/OS ID and business license number because users will reference this data to identify facilities in their supply chain or program.

2.9.1. Document and Photo Attachment

See Requirements **3.3.6, 4.3.6, 5.3.7** (also see 5.3.6 for WE Tech)

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.

2.9.2. Pre-closing Meeting

See Requirements **3.3.7, 4.3.7, 5.3.8**

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 - Incorrect”, “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.

2.9.3. Closing Meeting

See Requirements **3.3.8, 3.3.8, 5.3.9**

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 uses the Verification Summary to highlight 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.

The Verification Summary is an automated output containing all “Inaccurate – Incorrect” items and any legal “Non-Compliance” items, regardless of the Assessor/Verifier Selection. **The Verification Summary contains two indexes that can be useful during the closing meeting:**

- **Accuracy Index:** Compares the number of Inaccurate - Incorrect answers against the total number of facility responses
- **Completion Index:** compares the number of available questions to be answered by the facility against the total number of responses entered by the facility.
 - This index may fall below 100% after verification. For example, if the facility provided an Inaccurate - Incorrect answer, the Assessor/Verifier Response provided by the Verifier may prompt additional questions to appear that were not previously visible to the facility due to the Inaccurate – Incorrect Facility Self/Joint-Assessment Response. It is the Verifier’s responsibility to answer these additional questions accurately.

[Return to the top.](#)

2.10. In line with legal requirements

2.10.1. 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 Assessor/Verifier Selection or Assessor/Verifier Response) will be reflected in the Verification Summary for easy reference.

[Return to the top.](#)

2.10.2. 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.

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 Assessor/Verifier Explanation that the facility addresses the issue regardless of the absence of legal requirements.

[Return to the top.](#)

2.11. Law Guidance and Law Overlay

2.11.1. “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 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 Response** means the facility response if the Assessor/Verifier Selection is “Accurate”, or it is the Assessor/Verifier Response or Assessor/Verifier Explanation entry.
- **Automatic Law Overlay** means upon determination of the Final 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 system automatically

determines whether a specific facility circumstance is not in compliance with applicable legal requirements. This feature increases report quality through standard application of non-compliances and legal references.

The Verifier can override the automatic completion on Non-Compliance and Legal Reference, though it is unlikely necessary. 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

Assessor/Verifier Explanation.

Note: 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.

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

[Return to the top.](#)

2.12. Post-Onsite/Virtual Verification

See Sections [3.4](#), [4.4](#), [5.4](#).

2.12.1. 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.

2.12.2. Report Writing

See Requirements [3.4.3](#), [4.4.3](#), [5.4.3](#)

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 number of person-days required for verification of 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](#).

2.12.3. "Assessor/Verifier Explanation"

See Requirements [3.4.4](#), [4.4.4](#), [5.4.4](#)

The "Assessor/Verifier Explanation" narrative is an extremely important element of the verification process and Verifiers need to understand what is expected from them when completing this information.

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.

This means, it is the responsibility of the Verifier to produce a detailed explanation in "Assessor/ Verifier Explanation" 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 Facility Self/Joint-Assessment 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, "Assessor/Verifier Explanation" needs to include explicit details of the facility's circumstance; details that are clear, applicable to the question at hand, and factual.

[Return to the top.](#)

2.12.4. VB Quality Check

See Requirements 3.4.6, 4.4.6, 5.4.6

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.

Requesting an Addendum

If errors are discovered by a facility, Verifier Body, or the VOO through the QA or other processes, an addendum can be requested.

The facility can make the request by using a submission form. Once approved by both VB and facility, the VOO will review and either approve or deny the request. If approved, the VOO will post the details in the 'View Assessment' section in the Gateway system labeled as 'Addendum to

Report'.

Note: Addendums are only intended to update incorrect facility and Verifier selections that were made during the last Verification. Any remediation or corrective actions taken by the Facility after the Verification will not qualify for consideration and should be rejected.

2.12.5. VB Document Retention

See Requirements 3.4.7, 4.4.7, 5.4.7

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: Although Verifiers can request a copy from the facility, SLCP recommends Verifiers save a copy of the finalized verified assessment report for their records prior to changing the status to "VRC" since Verifiers and VBs do not have access to the report (status VRF).

[Return to the top.](#)

Box 3. "More Info"

"More info" is a valuable resource, and both facility and Verifier needs to reference this information for clarity on each data point.

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

- **Calculation methods** for measurement or distance questions
- **Legal compliance** questions support
- **Distinctions for clarity** across similar questions
- **Details on types** of programs (e.g., financing programs)
- **Appropriate answers based on specific scenarios** (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.

2.12.6. Facility Reviews Verified Assessment Report

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 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.

2.12.7. 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 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
- **Clarify concerns** with the Verifier/ VB regarding the quality or content of the report or questions about the verified assessment report, especially with regards to Assessor/Verifier Explanation issues (i.e., Assessor/Verifier Selection, Assessor/Verifier Response, Assessor/Verifier Explanation, Non-Compliance, Legal Reference) that **do not** relate to the Verifier following the Protocol or to Verifier conduct
- **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”.

2.12.8. 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.

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

An assessment 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.

2.12.9. Facility Shares Verified Assessment via the Gateway and/or 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.

[Return to the top.](#)

2.13. Quality Assurance

2.13.1. 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. Note that facility cooperation is needed for the timely scheduling of onsite QA activity.

QA activity by the VOO **can potentially 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.

2.13.2. 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 temporarily changes 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 must work with the VOO to determine the edits that need to be made. See the SLCP [QA Manual](#) for further details.

2.13.3. 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. VBs that fail to respond to VOO feedback and inquiries may be subject to their approval status being deactivated.

Example: Recent reports received a low-quality score because the Verifier(s) did not properly address questions that 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 “Assessor/Verifier Response”.** The Assessor/Verifier Explanation entered must support the Assessor/Verifier Response by describing the types of evidence they reviewed.

[Return to the top.](#)

Box 4: 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 Assessor/Verifier Explanation 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 every verified assessment report is free of errors. The facility is the owner of the report and, therefore, has the opportunity and responsibility to review the verified assessment report during the 14-day review period and inform the Verifier/ VB and/or VOO of any quality deficiencies. 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/Assessment 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 slcp@sumerra.com.

[Return to the top.](#)

2.14. 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. [Return to the top.](#)

SLCP Verification Requirements

3. SLCP Onsite Verification Requirements

IMPORTANT: All requirements presented in this section are mandatory for Verifier Bodies and Verifiers. Guidance is provided for each requirement and must be read. Some requirements are also accompanied with recommendations and/or references to provide further support throughout the verification process. The [Verifier Guidance](#) is referenced frequently for examples and scenarios and must also be read.

Questions should be interpreted 'literally' unless clarified in the 'More Info'. Verifiers are not expected to apply their own assumptions regarding intent of question.

3.1. How to read this section

Section 3 presents all mandatory requirements for the Validation Method "SLCP Onsite Verification". **Onsite verification requirements constitute the core requirements for SLCP verification and are color coded dark red.** Onsite verification Requirements are therefore presented as "**Core**"

Many Core requirements are common to all three Validation Methods and, therefore, maintain the same numbering across all three Validation Method sections for ease of reference and revision.

Section 3 requirements are intended to be a standalone set of requirements for SLCP Onsite Verification and are to be read in conjunction with Section 2 information on processes.

Each table of Core requirements contains the reference number, the requirement (Core), must-read guidance, and, where relevant, a fourth column providing recommendations, some examples and/or reference links to important documents (in particular the [Verifier Guidance](#) for examples and scenarios for specific requirements). This information is very useful in helping the Verifier prepare for various situations and to achieve a successful verification – it should be read along with all other information in each Table. See Figure 1.

Figure 1: Example of Tables of Core Requirements

This column provides valuable recommendations, examples and useful links.

| Reference number | Mandatory requirement. | Guidance is critical information that must be read. | |
|------------------|---|---|---|
| No. | Core Requirements | Guidance | Recommendations/ Examples/ References |
| 3.2.1.1 | Onsite portion of the Verification must be started within two (2) months of the self-assessment completion date | <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 onsite 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>Recommendation: Schedule the onsite verification at a time where at least 80% of the workforce is active, i.e., to avoid scheduling the verification during very low volume or holiday seasons.</p> |
| 3.2.1.2 | VB must confirm if any major changes to the | <ul style="list-style-type: none"> If changes in workforce are temporary, then furloughed workers must also be considered when determining the amount of onsite time. | <p>Example: the number of facility workers increased significantly</p> |

Note: If the Verifier/ Verifier Body cannot adhere to the requirements listed in this Protocol (all requirements mandatory for the type of SLCP verification) the Verifier/ Verifier Body must submit an [Exception Request](#) to the Verification Oversight Organization.

[Return to the top.](#)

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Onsite Verification (Core Requirements)

3.2. Core: Pre-onsite Verification

3.2.1. Planning the Verification

| No. | Core Requirements | Guidance | Recommendations/ Examples/ References |
|---------|--|---|--|
| 3.2.1.1 | Onsite portion of the Verification must be started within two (2) months of the self-assessment completion date | <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 onsite 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 | Recommendation: Schedule the onsite verification at a time where at least 80% of the workforce is active, i.e., to avoid scheduling the verification during very low volume or holiday seasons. |
| 3.2.1.2 | VB must confirm if any major changes to the workforce are permanent (e.g., terminations) or temporary (e.g., furloughs) so as to determine onsite time needed for verification | <ul style="list-style-type: none"> If changes in workforce are temporary, then furloughed workers must also be considered when determining the amount of onsite time. Onsite time is based on the facility's current workforce (workforce at the time of onsite verification). Changes to the workforce due to COVID-19 may impact the amount of time VBs spend on site. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>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.</p> </div> <ul style="list-style-type: none"> If at time of arrival at the facility the scope of the verification increases in person-days due to changes in facility circumstances, then the Verifier needs to immediately alert the VOO at slcp@sumerra.com. If the Verifier/VB cannot extend the onsite time, then they proceed as scheduled, but the Verifier must make explicit note in the Verification/ Assessment Details how they deviated from the Verification Protocol. | 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. |

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- | | |
|---|---|
| 3.2.1.3 The facility must determine the type of announcement. | <ul style="list-style-type: none">• Verification must be announced or semi-announced within a 10-day window.• 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 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.• 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. |
| <hr/> | |
| 3.2.1.4 The facility and the VB must agree on and have a documented agreement outlining the specified date or date range for onsite verification | <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. |
| <hr/> | |
| 3.2.1.5 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 | <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. |
-

Reference: Please refer to the [Verification Observation Requirements](#) on our Helpdesk.

[Return to the top.](#)

3.2.2. Assigning a Verifier

| No. | Core Requirements | Guidance | References |
|---------|--|--|---|
| 3.2.2.1 | The VB must ensure all rules for Verifier selection are enforced | <ul style="list-style-type: none"> 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. | |
| 3.2.2.2 | The VB must follow verification person-day minimum requirements and must assign more than one Verifier accordingly | <ul style="list-style-type: none"> See Table 4 for person-day minimum requirements for onsite verification activity. | |
| 3.2.2.3 | 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 | Reference: See Annex II for more information on how VBs and Verifiers are designated eligible for a specific facility. |

[Return to the top.](#)

3.2.3. Assigning Person-days

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.2.3.1 | The number of calendar days for onsite verification must not exceed 4 consecutive working days | <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. |
| 3.2.3.2 | Trainees, assistants or other individuals who are not SLCP approved Verifiers cannot count toward the person-day requirement | <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. |
| 3.2.3.3 | Person-day requirements may only be decreased if virtual verification activity takes place and in accordance with virtual verification requirements | <ul style="list-style-type: none"> • For information on possible reduction in person-days see Virtual + Onsite section. • Step 1 person-day listing in Table 4 is a minimum requirement for onsite verification and must be followed. • 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. • 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. |

[Return to the top.](#)

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

| No. | Core Requirements | Guidance | Recommendations |
|---------|---|--|---|
| 3.2.4.1 | VB and Verifiers must follow Table 4 (below) in calculating on-site person-days, number of interviews and the sample of documents to review for onsite verification | <p>Table 4:</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 product or directly involved in the operations of the facility). They are non-supervisory. Which means, no one reports to them. Time 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. | <p>Recommendation: Step 2 and Step 3 person-day listings in Table 4 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</p> <p>Recommendation: VB adds additional onsite time if any of the following conditions apply:</p> <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. |
| 3.2.4.2 | If more than one Verifier is present and Verifiers were not present each day, Verifier must note in Verification/Assessment Details the name of Verifier present on which day | <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/Assessment Details section of the report | |

[Return to the top.](#)

Table 4: Determining minimum person-days, number of interviews and sample of document review for onsite verification

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| 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](#)).

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.](#)

Box 5: 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 4. 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 4 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).

[Return to the top.](#)

3.2.5. Review of Self/Joint Assessment

| No. | Core Requirement | Guidance |
|---------|--|---|
| 3.2.5.1 | The Verifier must study the self/joint-assessment completed by the facility to prepare for the onsite verification | <ul style="list-style-type: none"> 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). |
| 3.2.5.2 | 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 | <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. |
| 3.2.5.3 | Verifier must ensure the self/joint-assessment contains at minimum 3 months of operation/3 months of self-assessed data | <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. |
| 3.2.5.4 | Verifier must review self/joint-assessment answers to ensure only English was used for Facility Self/Joint-Assessment Responses (unless the question explicitly asks for local language) | <ul style="list-style-type: none"> It is in the VB's/Verifier's interest to ensure all Facility Self/Joint-Assessment Responses are in English, because if the Facility Self/Joint-Assessment Responses are not in English, the Verifier will have to provide the English response in Assessor/Verifier Explanation for users to understand the Final Response. This means the Verifier is spending time translating the Facility Self/Joint-Assessment Responses. Accredited Host checks are required to detect non-English language and direct the facility to update the Facility Self/Joint-Assessment Response to English. However, technical failures can occur. If the self/joint-assessment contains non-English Facility Self/Joint-Assessment 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 Facility Self/Joint-Assessment Responses. There are only two questions that ask for local language facility responses, if applicable. |
| 3.2.5.5 | VB and Verifier must obtain | <ul style="list-style-type: none"> Employment laws include minimum wage, working hours and social benefits that pertain to the facility location |

relevant social and labor
information related to specific
conditions within the country and
region of SLCP verifications

- [International Labour Organization \(ILO\) conventions](#) pertaining specifically to the eight ILO Fundamental Conventions:
 - [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](#).

3.2.5.6 The VB must conduct a background
check of the facility

- The background check must include at a minimum:
 - 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.

[Return to the top.](#)

3.2.6. Communication with Facility

| No. | Core Requirements | Guidance | Recommendations/ References |
|---------|--|---|--|
| 3.2.6.1 | 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 | <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 if 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 days of the verification assessment) the facility may provide additional information after the onsite verification, and the facility can only provide additional information up to 2 working days after onsite verification. Normal Protocol requires the facility to have all information ready during 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. 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 | <p>Reference: 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</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</p> |

facility data, such as, location, number of workers and languages spoken to estimate the onsite verification duration. **The verification duration can only be estimated 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.

3.2.6.2 The Verifier/VB must send a **verification plan** no less than five working days prior to the scheduled verification

- The verification plan must outline the daily Verification/Assessment Details including, at a minimum:
 - 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)
 - 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).

Reference: See the [Verifier Guidance](#) for a verification plan sample.

3.2.6.3 During the scheduling process, the VB must discuss with the facility any changes in their workforce due to COVID-19 or other exceptional circumstances

- 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

Recommendation: 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, the verification should not take place).

Prior to travelling to the verification site, VB should check for any health and safety,

- 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.

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)

[Return to the top.](#)

3.3. Core: Onsite Verification

3.3.1. General

| No. | Core Requirements | Guidance | Recommendations/ Examples/ References |
|---------|-------------------------------|---|--|
| 3.3.1.1 | Verifier must verify all data | <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) <p>Even if the facility did not provide an answer to the applicable question, the Verifier has to verify the correct answer.</p> <p>Some Verifier selections in the Tool can open up questions that the facility did not</p> | <p>Reference: See Verifier Guidance for more details.</p> |

see during the self/joint-assessment and therefore did not answer.

Note: The Verifier must still provide the Assessor/Verifier Response and supporting Assessor/Verifier Explanation to these unanswered questions.

3.3.1.2 The timeframe of the Assessor/Verifier Explanation must be based on the same previous 12 months from the date that the self/joint-assessment is completed by the facility

- 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”.
- **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)).**

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 Self/Joint-Assessment 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 Self/Joint-Assessment Response as inaccurate and provide details in Assessor/Verifier Explanation. Any observation the Verifier makes on site to contradict a Facility Self/Joint-Assessment Response suggests that it is not an isolated practice and must be included as part of the 12-month assessment.

3.3.1.3 Each verification must cover the area as defined by the facility in the Facility Profile of the self/joint-assessment and all operations included therein

- **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.

Dependent upon country, **Business License requirements can vary.** As an example, one license may cover multiple addresses, or a facility may have

Reference: Please see the [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.

Reference: For additional guidance and clear

multiple operations with one address under separate licenses.

- **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 (FP-BAS-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 Facility Self/Joint-Assessment Response. The facility must treat the multiple business licenses as one facility, meaning the number of workers shall be all business licenses combined.
- **Physical scope: workers' housing/ dormitories:** Only housing used by workers (does not have to be exclusive to workers) is within the 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.
- **Building/construction, structural safety and fire permits and certificates** must cover all structures and any additions made to the facility, including any canteen and childcare facilities, as applicable. If any documents are missing or do not cover all structures, the Verifier must select 'Inaccurate - Incorrect' and provide all relevant details in the 'Assessor/Verifier Explanation' field (e.g., *HS-BUI-1: Are building/construction, structural safety and fire permits and certificates in line with legal requirements?*). If there are no applicable legal requirements, answer No applicable legal requirements.

requirements on assessments related to a facility's business license 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->

3.3.1.4 Any verification activity must comply with all applicable data privacy laws and regulations

- This applies to all data including:
 - 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).

3.3.1.5 Verifiers must include all applicable types of “workers” in the verification

- 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).

3.3.1.6 Verifiers must cross-check information from observation and documentation review with information gathered from interviews with both management and workers to under-stand how workers are affected by various situations

- **The general principle of “triangulation” applies to the verification activity just as it applies to traditional social auditing.**
- The method of triangulation in data analysis draws on multiple methods of data sources (3 or more pieces of evidence/ difference sources) to develop a comprehensive understanding of a situation.
- All supporting documentation (e.g., photos, WE Question Set results, etc.) must be used to cross check information provided in the self-assessment and to highlight any areas in need of further attention.

Reference: See [Verifier Guidance](#) for more details and examples on triangulation.

[Return to the top.](#)

3.3.2. Opening Meeting

| No. | Core Requirements | Guidance | Reference |
|---------|---|---|--|
| 3.3.2.1 | The onsite verification must start with an opening meeting | <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. 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. | Reference: For opening meeting agenda recommendations see Verifier Guidance . |
| 3.3.2.2 | Authorization to take pictures must be requested | <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/ screenshot sensitive (i.e., proprietary) products, materials or processes. If photo/ screenshot 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/ screenshots and yet agree to take photos/screenshots themselves on behalf of the Verifier, this must be noted in the report along with any incidences where the Verifier did not receive pictures/ screenshots they requested. | |
| 3.3.2.3 | Verifier must inform management that the Verifier selects the workers to interview | <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. | |
| 3.3.2.4 | If applicable, Verifiers must inform management that they wish to interview the head of the union(s) and worker representative(s) | <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. | |

[Return to the top.](#)

3.3.3. Walkthrough

| No. | Core Requirements | Guidance |
|---------|--|---|
| 3.3.3.1 | Verifier must take time to first look at the 'big picture' before focusing on the detail | <p>See Annex VII for tips on the onsite walkthrough.</p> <p>Examples of items to look for to understand the 'big picture':</p> <ol style="list-style-type: none"> 2. People being ushered out of the workplace (e.g., children, or those without contracts) 3. People being moved within the workplace (e.g., young people doing hazardous work or pregnant women working with chemicals being moved) 4. Things being hastily hidden (chemicals in the general work area), or doors being quickly locked or unlocked 5. PPE being hastily put on 6. 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). |
| 3.3.3.2 | Verifier must inform the facility about any inaccuracies during the verification | <ul style="list-style-type: none"> • Throughout the verification, the Verifier informs facility management about any inaccuracies, notable Assessor/Verifier Explanation 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 Self/Joint-Assessment 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. |
| 3.3.3.3 | Verifier must follow any applicable facility Health & Safety protocols | <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 Health & Safety rules, e.g., social distancing when conducting verifications |

[Return to the top.](#)

3.3.4. Worker and Management Interviews

| No. | Worker Interviews: Core Requirements | Guidance | Examples/ References |
|---------|---|---|---|
| 3.3.4.1 | Verifier must meet or exceed the minimum number of worker interviews | <ul style="list-style-type: none"> Sample size for onsite verifications is based on Table 4 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/Assessment Details section of the Tool as to why they did so. | |
| 3.3.4.2 | Verifier must interview a representative sample of workers | <ul style="list-style-type: none"> The Verifier must consider both the types of contracts and types of people in the workforce. | Reference: See Annex VII for more information. |
| 3.3.4.3 | Verifier must interview the trade union and/or worker representative (if applicable to the facility) | <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) – 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 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. | |
| 3.3.4.4 | Worker interviews are strictly confidential and subsequent reports will not identify the names of interviewees nor their individual responses | <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). | |

| | |
|---|---|
| | <ul style="list-style-type: none"> • Verifiers may keep a confidential record of those with whom they have had interviews if VB requires. • Interviews must take place away from management and supervisors in a room or space where interviewees feel comfortable sharing sensitive information. |
| 3.3.4.5 Interviews must take place in a language understood by workers either with additional Verifiers or onsite interpreters | <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; 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. • The Tool asks for primary, secondary and third most prevalent language spoken by workers, as well as the primary language spoken by facility management. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>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.</p> <p>See Examples in Verifier Guidance.</p> </div> |
| 3.3.4.6 The verification team must be able to support at least the top two languages spoken by workers and the primary language spoken by management | <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. • See examples in Verifier Guidance. • The facility has the right to insist on following a higher standard and requiring more language capability. |

3.3.4.7 Interpreters must be independent of the facility and trained to understand social compliance topics

- 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.

| No. | Management Interviews: Core Requirement | Guidance | Reference |
|----------------|--|--|--|
| 3.3.4.8 | Verifiers must conduct management interviews | <ul style="list-style-type: none"> • 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. | Reference: See Annex VII for tips on management interviews. |

[Return to the top.](#)

3.3.5. Document Review

| No. | Document Review: Core Requirement | Guidance | Examples/ References |
|---------|--|--|--|
| 3.3.5.1 | Verifiers must review documents to understand the facility's procedures and to verify specific claims about how the workforce is managed | <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. 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. 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. 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 to include details on policies so end users can analyze the information in relation to their own codes. <div> <p>IMPORTANT: The Facility Profile Gateway data will be updated with the final verified data. Therefore, it is very important that the Verifier checks and verifies the facility data, especially the OAR/OS ID and business license number because users will reference this data through the Gateway public facility data to identify facilities in their supply chain or program.</p> </div> | <p>Example of full policy document review: 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.</p> |

| No. | Wage and Hours records Core Requirements | Guidance | Reference |
|---------|--|---|---|
| 3.3.5.2 | 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. | <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> <ul style="list-style-type: none"> The Verifier may extend the sample within the 12-month assessment period if s/he think it necessary to substantiate the verification. 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). | <p>Reference: For examples of what do to when reviewing wages and hours see Verifier Guidance.</p> |
| 3.3.5.3 | 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. | <ul style="list-style-type: none"> 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 | <p>Reference: For examples of how to record more than one unit of pay in the facility see Verifier Guidance.</p> |

[Return to the top.](#)

3.3.6. Document and Photo Attachments

| No. | Core Requirement | Guidance | Examples |
|---------|---|--|---|
| 3.3.6.1 | Verifiers must include specific photographic/ screenshot evidence and/or documentation attached to questions of the Tool, selecting the question that best fits | <ul style="list-style-type: none"> At minimum, Verifiers must include photographic/ screenshot 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 - Incorrect” 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 “Assessor/Verifier Selection” Photographs/ screenshots 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/ screenshots/ documentation is only possible through the online | <p>For examples of instances for document/photo/ screenshot attachments see Verifier Guidance.</p> |

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- 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/Assessment 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/ screenshots 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.

[Return to the top.](#)

Box 6: What is considered Denied Access?

In some cases, physical access could be denied to the Verifier for specific parts of the building or exclusion of entire buildings/ processes. However, this is only considered Denied Access based on specific parameters:

- 1) **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 Assessor/Verifier Selection will be "Inaccurate - Incorrect", affecting the Accuracy Index of the report.

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

If denial of access is due to confidentiality, the Verifier must check the applicable confidentiality clause in place, include details about confidentiality in the Assessor/Verifier Explanation and also in the Verification/Assessment 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/Assessment Details.

- 2) **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.

[Return to the top.](#)

Box 7: How to address situations of Denied Access

- **Select “Inaccurate - Incorrect” for the Facility Self/Joint-Assessment Response** related to the physical area or process to which the Verifier is being denied
- **In the Assessor/Verifier Explanation of “Inaccurate – Incorrect”:**
 - 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 Assessor/Verifier Explanation cells.
- **Make note in the “Verification/Assessment 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/Assessment 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 Assessor/Verifier Explanation (even if Accurate) that the area of denied access is included in the permit.

[Return to the top.](#)

3.3.7. Pre-closing Meeting

| No. | Core Requirements | Guidance | Reference |
|---------|--|---|---|
| 3.3.7.1 | Prior to the closing meeting, the Verifier must take the time to complete all “Inaccurate - Incorrect”, “Non-Compliance” (for Verification Summary) and “Updated during Verification” items to prepare for the closing meeting | <ul style="list-style-type: none"> • If the Verifier has not already completed all “Inaccurate - Incorrect”, “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 and may have to skip some entries in the Verification Summary or just provide highlights to the facility. | Reference: More information about how to complete the Verification Summary is in the Verifier Guidance . |
| 3.3.7.2 | 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 | <ul style="list-style-type: none"> • This will help the Verifier gather any further information related to differences between the original self/joint-assessment data and the verified data. | |

[Return to the top.](#)

3.3.8. Closing Meeting

| No. | Core Requirements | Guidance | Reference |
|---------|--|---|--|
| 3.3.8.1 | The onsite verification must end with a closing meeting | <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. 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. | Reference: See Verifier Guidance for closing meeting agenda recommendations |
| 3.3.8.2 | Verifier must not provide training or help the facility to identify root causes of the issues found | <ul style="list-style-type: none"> It is out of scope and not the Verifier’s role to train management, to help the facility identify 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. | |
| 3.3.8.3 | 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 | <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 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 | |

3.3.8.4 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

- 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 3.4.1).
- 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)
- If concerns relate to Verifier following Verification Protocol and/or Verifier conduct, then the facility can raise a Dispute, see Section 2: 2.11.8.

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.

[Return to the top.](#)

3.4. Core: Post-onsite Verification

3.4.1. Addressing Facility Concerns

| No. | Core Requirements | Guidance |
|----------------|--|--|
| 3.4.1.1 | Verifier must address facility concerns brought up during the verification/ closing meeting within two days (48 hours) from end of verification and address any applicable requests for edits by the facility within the 14-calendar day review period in VRC. | <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 Section 2: 2.11.8. • The Verifier may have to review further documentation or conduct remote interviews due to exceptional circumstances during 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 must offer the facility the option to include their concerns in the applicable Assessor/Verifier Explanation field along with an explanation from the Verifier why the Verifier did not make edits to the final report.

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 time of verification needs to be noted as a non-compliance and/or inaccuracy for the verification. If the facility makes a correction before the end of the verification, the Verifier can make a note in Assessor/Verifier Explanation 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.

[Return to the top.](#)

3.4.2. Verified Assessment Report Revision

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.4.2.1 | Any changes the Verifier makes to the report after completion/ during the facility review phase must be agreed upon by the facility | <ul style="list-style-type: none">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. |
| 3.4.2.2 | 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.

3.4.2.3 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”.

[Return to the top.](#)

3.4.3. Report Writing: Assessor/Verifier Selections and Entries

| No. | Core Requirements | Guidance |
|----------------|---|--|
| 3.4.3.1 | Assessor/Verifier Selection must be completed correctly following the specific rules explained in the column “Guidance” | <p>There are six (6) Assessor/Verifier Selection options for the Verifier to manually select and three (3) automated verification options that are automatically made for the Verifier by the Tool.</p> <p>The rules on what Assessor/Verifier Selection to choose are as follows:</p> <ol style="list-style-type: none"> 1. <u>Accurate:</u> Information provided by the facility is 100% correct and supported by data. 2. <u>Updated during Verification:</u> 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. 3. <u>Inaccurate – Incorrect:</u> Information provided by the facility has one or more errors because facility made a mistake or did not share accurate/ honest data (e.g., business license is actually not valid anymore). This Assessor/Verifier Selection is chosen if: <ul style="list-style-type: none"> – 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) |

- If there is a lack of documentation that does not permit accurate verification of specific questions
4. **Inaccurate – Misunderstanding**: To be selected by the Verifier when the facility has misunderstood the question (e.g., wrong understanding of “worker” and including supervisors in the calculations of total number of workers) and provided an Inaccurate Facility Self/Joint-Assessment Response.
- SLCP provides the Verifier with all definitions and explanations in “More Info”.

Note: 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 Assessor/Verifier Explanation field.

The Assessor/Verifier Response option is not applicable for Follow-up Questions where the facility provides a description. Therefore, the Assessor/Verifier Response field is whited out. Since all Follow-up Questions have free narrative answers; the Assessor/Verifier Explanation field is sufficient to offer an opportunity for the Verifier to provide the correct information and additional details on the facility’s circumstances, if necessary.

5. **Facility did not reply during SA/JA**: This means that the facility did not provide a response at all.
- This feature is automated.** The Verifier does not need 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 (available for onsite verification only), the AH completes the "Facility did not reply during SA/JA" Assessor/Verifier Selection before the Verifier opens the offline Tool.

Note: In the offline Tool (available for onsite verification only) dark grey fields indicate that the facility has not provided a response. When the facility provides a response, the color changes to light grey. For dark grey fields not answered by the facility, **the Verifier must still enter the Assessor/Verifier Response and provide Assessor/Verifier Explanation to support the Assessor/Verifier Response.**

6. **Not visible to facility during SA/JA**: The Assessor/Verifier Response opens up conditional questions not previously visible for the facility to answer during self/joint-assessment, and therefore the Facility Self/Joint-Assessment Response is blank.
- This feature is automated.** The Verifier does not need to select “Not visible to facility during SA/JA” as it is automatically done for the Verifier in the online and offline (available for onsite verification only) version of the Tool.

Note: Automated Assessor/Verifier Selections may be overridden by the Verifier, i.e., the Verifier can manually change an automated Assessor/Verifier 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.

7. **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 Assessor/Verifier Selection is chosen by the Verifier, then the Assessor/Verifier Response column remains blank and must not be completed because the question is not applicable.
8. **No longer applicable due to verification:** The Assessor/Verifier Response makes the conditional questions that were answered (or not answered) by the facility in the self/joint-assessment no longer applicable.
This feature is automated. The Verifier no longer needs to select “No longer applicable due to verification” as it is automatically done for the Verifier in the offline and online version of the Tool.
The Verifier does not need to provide an explanation in Assessor/Verifier Explanation. Once this option has been automatically selected the Assessor/Verifier Response column remains blank because the question is not applicable. For the user of the verified data the Assessor/Verifier Selection alone 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 Assessor/Verifier Response AND also if the Assessor/Verifier Selection of the parent question is “Not applicable due to special facility circumstances.”

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

See the [Verifier Guidance](#) for examples of when to use different responses and for more details.

| | |
|--|--|
| <p>3.4.3.2 Depending on the Assessor/Verifier Selection, other verification fields must be completed/cannot be left blank</p> | <ul style="list-style-type: none"> See Table 5 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>3.4.3.3 Assessor/Verifier Explanation 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 5 for when attachments are required Support material is required (if feasible) where the Assessor/Verifier Selection is “Inaccurate - Incorrect” and if there is a “Non-Compliance” |
| <p>3.4.3.4 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 If facility does not permit photographs due to confidentiality, then please note in report under the Verification/Assessment 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. <div data-bbox="649 933 1948 1061"> <p>Note: The facility must provide reasonable explanation as to why photos will breach confidentiality. If the Verifier suspects denial of photos based on reasons other than data privacy, then the Verifier needs to explain this in Verification/Assessment Details.</p> </div> |

[Return to the top.](#)

Table 5: Requirements for Completion of Verification Fields

| Assessor/Verifier Selection | Assessor/Verifier Response | Assessor/Verifier Explanation | 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 Assessor/Verifier Explanation, then must upload |
| Inaccurate - Incorrect selected | NEVER BLANK Must select or fill in | NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Incorrect and 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 | 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 section 2.9.1 [Identifying and citing when facility is not in line with legal requirements.](#)

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|---|---|--|---------------|--|---|
| Inaccurate - Misunderstanding selected | NEVER BLANK Must select or fill in | NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Misunderstanding and share facility details so users of the verified data can make corrective action plans as necessary. Information helps SLCP to continuously improve. | As applicable | If Non-Compliance selected, must fill in narrative | MUST UPLOAD if proof/documentation available |
| Facility did not reply during SA/JA automatic selection | 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 automatic selection | 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 |

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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 | | | would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload |
| Not applicable due to special facility circumstances selected | | <p>NEVER BLANK</p> <p>Must fill in narrative to explain why there is a special facility circumstance that results in the Assessor/Verifier Response not being applicable</p> | | | If proof/ documentation available to emphasize a point shared in Assessor/Verifier Explanation, then must upload |
| No longer applicable due to verification automatic selection | | Verifier can choose to leave comments | | | |
| Verification not Required | | Verifier can choose to leave comments | | | |

[Return to the top.](#)

3.4.4. Report Writing: Assessor/Verifier Explanation

In addition to the correct Assessor/Verifier Selection and Assessor/Verifier Response, **Assessor/Verifier Explanation is essential** for users to understand facility circumstances and make decisions on compliance levels, corrective action and remediation. Users use Assessor/Verifier Explanation to inform compliance, grading, certification and/or remediation. **For the table of requirements below make sure to read the [Verifier Guidance](#) for important examples!**

| No. | Core Requirements | Guidance |
|---------|---|--|
| 3.4.4.1 | Verifiers must provide details in “Assessor/Verifier Explanation” that clearly explain the reason for the specific Assessor/Verifier Selection and provide users of SLCP data with necessary information to inform post SLCP steps (including grading, certification and corrective action plans) | <ul style="list-style-type: none"> • If Assessor/Verifier Selection is “Accurate”: there may be circumstances which make the situation unique or irregular. In these cases, the Verifier must provide additional information in Assessor/Verifier Explanation (e.g., India’s Variance Dearness Allowance (VDA)). See detailed examples and situations in Verifier Guidance. • If Assessor/Verifier Selection is “Inaccurate - Incorrect”: the user of the data needs to understand what the accurate situation is (Assessor/Verifier Response) and why the situation was not captured accurately by the facility in the self/joint-assessment (Assessor/Verifier Explanation). <ul style="list-style-type: none"> – Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation 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 Assessor/Verifier Selection is “Inaccurate - Misunderstanding”: the Verifier must provide the Assessor/Verifier Response along with the Assessor/Verifier Explanation that clearly states the reasons why the facility misunderstood the question. Detailed and clear Assessor/Verifier Explanation is also critical to informing continuous improvement of SLCP processes. <ul style="list-style-type: none"> – Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation 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 Assessor/Verifier Selection is “Updated during Verification”:** If Facility Profile responses need to be updated the Verifier must provide details for the update in Assessor/Verifier Explanation. Reasons provided by the Verifier can be a simple explanation like something changed between the date of self-assessment and verification. See [Example “Updated during verification” in Verifier Guidance](#).
- 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 Assessor/Verifier Explanation must explain that the facility addresses the issue regardless of the absence of legal requirements.
- If the Final Response shows a result that according to Verifier’s social auditing experience would normally result in a code of conduct or standard non-compliance (no matter if the Assessor/Verifier Selection is Accurate or Inaccurate), Assessor/Verifier Explanation must include details so that the user of the report can better inform remediation efforts. See [Verifier Guidance](#) for example.
- **If Facility Self/Joint-Assessment 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.
- **If the Assessor/Verifier Selection is “Facility did not reply during SA/JA”,** the Assessor/Verifier Explanation must be a short statement of what information was reviewed to support the Assessor/Verifier 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:” See [Verifier Guidance](#) for example.

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.

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

- The 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”
- **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/Assessment 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:**
 - 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:
 - Raising a Non-Compliance and filling in the Legal Reference for any applicable Assessor/Verifier Selection, including Inaccurate – Incorrect, Inaccurate – Misunderstanding, Accurate, Not visible to facility during SA/JA and other selections.

See also information about the [Law Overlay](#).

| | |
|--|---|
| <p>3.4.4.3 Temporary regulatory circumstances must also be explained in Assessor/Verifier Explanation, as applicable, and in the Verification/ Assessment 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 Assessor/Verifier Selection and Final Response, if there was a temporary regulatory circumstance this must be mentioned, as applicable, in the Assessor/Verifier Explanation and the Verification/Assessment Details section of the report.</p> |
| <p>3.4.4.4 If the Facility Self/Joint-Assessment Response 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"> – For example: “Are toilets clean, and sanitized on a regular basis?” If the Facility Self/Joint-Assessment 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>3.4.4.5 If the facility misunderstood the question, the Verifier must select Inaccurate – Misunderstanding as the Assessor/ Verifier Selection field</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 on the question. • This specific Assessor/Verifier Selection does not count against the Accuracy Index, but still shows the facility that they can improve their understanding of the question. • A “Misunderstanding” means that the facility did not understand the question properly. • A “Misunderstanding” <u>does not mean</u> the facility misjudged the facility circumstances because they were not aware of the real situation. <ul style="list-style-type: none"> – A situation of Misunderstanding: 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 Assessor/Verifier Response and selects “Inaccurate – Misunderstanding” in the Assessor/Verifier Selection field. Then the Verifier explains the misunderstanding of the facility in the Assessor/Verifier Explanation field. – Not a situation of Misunderstanding: 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 - Incorrect”. It is a real mistake by the facility and should be |

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| | | shown as such. It documents that facility management does not know its facility operations as well as it thought. | |
| 3.4.4.6 | The Verifier must provide enough details for the reader to identify if the situation is “isolated” or “systemic” | <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. • Systemic: Issues that are purposeful, intentional, and methodical in nature that occur regularly and/or impact a significant number of workers. | Reference: See Verifier Guidance for examples of isolated and systemic issues. |
| 3.4.4.7 | Assessor/Verifier Explanation clearly links to the question/ data point | <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 Assessor/Verifier Explanation fields is poor form. | |
| 3.4.4.8 | Assessor/Verifier Explanation is factual and without judgment | <ul style="list-style-type: none"> • Assessor/Verifier Explanation 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 Assessor/Verifier Explanation, 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. | |
| 3.4.4.9 | Verifier must enter all Assessor/Verifier Explanation in English | <ul style="list-style-type: none"> • The SLCP final verified assessment report is 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 translate the facility’s response into English in the Assessor/ Verifier Explanation field. • 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. | Reference: See Verifier Guidance for example. |

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| 3.4.4.10 | Assessor/Verifier Explanation uses correct spelling and grammar | <ul style="list-style-type: none">It is very important that the information is entered using correct spelling and grammar so the user can easily understand the verified assessment report. | |
| 3.4.4.11 | Assessor/Verifier Explanation statements must be based on the 12-month assessment period* | <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. Assessor/Verifier Explanation statements are to be based on this assessment 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 Assessor/Verifier Selection “Updated during Verification”</p> | Reference: See Verifier Guidance for example. |

[Return to the top.](#)

3.4.5. Report Writing: Verification/Assessment Details

| No. | Core Requirements | Guidance | Example |
|---------|--|--|---|
| 3.4.5.1 | All fields in the Verification/Assessment Details section must be completed | <ul style="list-style-type: none"> • If the Verifier does not have any information to enter, the Verifier must still complete the field with N/A. • Verifier should pay attention to the More Info links/fields to understand what to respond to in the Verification/Assessment Details section. • The question in Verification/Assessment Details about Verification Duration must be filled in with the total number of person-days used for verification (which may also include virtual verification). | <p>Example–Person-days:</p> <ul style="list-style-type: none"> – 2 Verifiers for 2 calendar days = 4 person-days. – 1 Verifier for 1 calendar day virtual and 2 Verifiers for 1 calendar day onsite = 3 person-days. |
| 3.4.5.2 | The Verifier must enter Verification/Assessment Observations about the facility if the facility engages in behavior that negatively impacts process integrity. | <ul style="list-style-type: none"> • In Verification/Assessment Details section of the Tool, v1.5 of the Tool now asks the question: <i>VD-VERI-19: 1.1 Did the facility engage in behavior that impacts process integrity (e.g., incomplete, inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?</i> • Facilities should report actual conditions and be transparent about any non-compliance with applicable legal requirements or facility practices like double bookkeeping. • Entries in this section of the report will be visible to the facility for review. The Verifier must report only confirmed findings, as stipulated in the CAF Terms of Use: “Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users.” The SLCP Signatory Charter also calls for signatories to “respect the principle of true data in SLCP verified assessments by recording and accepting honest data, and by prioritizing remediation over punishment”. <p>If the Verifier has any doubts about the information they are reporting in “Verification/ Assessment Observations” then the Verifier should use the confidential reporting form. See below: 3.4.10 Reporting on sensitive issues and suspicious activities outside of the Final Verified Assessment Report.</p> | |

[Return to the top.](#)

3.4.6. VB Quality Check

| No. | Core Requirement | Guidance | References/ Recommendations |
|---------|---|---|--|
| 3.4.6.1 | 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 | <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. On calendar day 5 after the assessment status changes from “Verification in Progress” (VRP) (via “Verification Quality Check” (VRQ)) 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. 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>Reference: 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).</p> <p>Reference: Go to our Helpdesk to see which data quality checks SLCP is currently running.</p> <p>Recommendation: 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.</p> <p>Although not a requirement, SLCP highly recommends the Verifier review the VRQ check failure email and revise the report as applicable.</p> |

Note: 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 prior to and after finalization. Any failures/ mistakes still in place will negatively affect the Verifier and VB score.

3.4.7. VB Document Retention

| No. | Core Requirement | Guidance |
|---------|---|--|
| 3.4.7.1 | 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>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>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.</p> |

3.4.8. VRF Edits

| No. | Core Requirement | Guidance | References |
|---------|--|--|---|
| 3.4.8.1 | 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. | <ul style="list-style-type: none"> 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. 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 need to work with the VOO to determine the edits that need to be made. | Reference: see the SLCP QA Manual for further details. |

[Return to the top.](#)

3.4.9. Ethics

| No. | Core Requirements | Guidance |
|---------|--|--|
| 3.4.9.1 | Accepting gifts of any value from facility managers, workers or others related to the verification is inappropriate and not permitted. | <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 • The Verifier must advise their VB and contact the VOO immediately to report the incident and to 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). |
| 3.4.9.2 | Verifiers must never allow management to take them out for lunch during a verification nor accept payment for lunch | <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. |
| 3.4.9.3 | Verifiers/VBs must adhere to Annex I and Annex VI | <ul style="list-style-type: none"> • See Annex I Professional Conduct and Annex VI SLCP Code of Conduct |

[Return to the top.](#)

3.4.10. Reporting issues outside Final Verified Assessment Report

| No. | Core Requirements | Guidance |
|----------|--|--|
| 3.4.10.1 | 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 | <ul style="list-style-type: none"> 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. 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. 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: <ul style="list-style-type: none"> 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) <p>See Verifier Guidance for scenarios and examples.</p> |
| 3.4.10.2 | VBs must review information on the Gateway related to sensitive/ confidential (if applicable) and share this information with the Verifier before conducting any new Verification, as the previous Verification report is not always shared. | <ul style="list-style-type: none"> Facility profile note is only visible to the VBs and admins. The facility does not have visibility to the notes. The information shared by the VOO related to the sensitive/confidential report will be clearly displayed on the Gateway. |

[Return to the top.](#)

4. SLCP Virtual + Onsite Verification Requirements

SLCP 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.

There is a new field in the online report template for SLCP Virtual + Onsite Verification called **"Validation Method"**. The default setting for this new field is "SLCP Onsite Verification". If the data point is being verified virtually, the Verifier must therefore manually change the selection to "SLCP Virtual Verification" so the end user of the data knows which data points were verified onsite and which were verified virtually. The Validation Method selection appears for each question if SLCP Virtual + Onsite Verification scope applies. See specifically Requirement 4.3.1.2 under General Virtual Requirements for further details.

This section includes all relevant core requirements (onsite verification) and virtual requirements a facility must meet to consider virtual verification activity. Core and Virtual requirements are color coded for ease of reference.

Note: 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.

IMPORTANT: All requirements presented in this section are mandatory for Verifier Bodies and Verifiers. Guidance is provided for each requirement and must be read. Some requirements are also accompanied with recommendations and/or references to provide further support throughout the verification process. The [Verifier Guidance](#) is referenced frequently for examples and scenarios and must also be read.

Questions should be interpreted 'literally' unless clarified in the 'More Info'. Verifiers are not expected to apply their own assumptions regarding intent of question.

[Return to the top.](#)

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4.1. How to read this section

Section 4 presents all mandatory requirements for the Validation Method “SLCP Virtual + Onsite Verification”. Virtual + Onsite verification requirements include the **Virtual** requirements specific for SLCP verification and are color coded **green**. Virtual verification Requirements are therefore presented as “**Virtual**”.

A number of Core requirements are common to Virtual + Onsite Verification and Full Virtual Verification; therefore, Core requirements maintain the same numbering across all three Validation Method sections (Onsite Verification, Virtual + Onsite Verification and Full Virtual Verification) for ease of reference and revision.

A number of Virtual requirements are common to Full Virtual Verification as well; therefore, Virtual requirements maintain the same numbering across both Validation Method sections (Virtual + Onsite Verification and Full Virtual Verification) for ease of reference and revision.

Section 4 requirements are intended to be a standalone set of requirements for SLCP Virtual + Onsite Verification and are to be read in conjunction with Section 2 information on verification processes.

Each table of Virtual + Onsite requirements contains the reference number, the requirement (Core (if applicable) and Virtual), must-read guidance, and, where relevant, a fourth column providing recommendations, some examples and/or reference links to important documents (**in particular the [Verifier Guidance for examples and scenarios for specific requirements](#)**). This information is very useful in helping the Verifier prepare for various situations and to achieve a successful verification – it should be read along with all other information in each Table.

Figure 2 below shows an example of a Virtual + Onsite Requirements table with core and virtual mandatory requirements.

Figure 2: Example of Tables of Virtual + Onsite Verification Requirements

Reference number Mandatory requirement. Guidance is critical information that must be read. This column provides valuable recommendations, examples and useful links.

| No. | Management Interviews: Core Requirement | Guidance | Reference |
|---------|---|--|--|
| 3.3.4.3 | Verifiers must conduct management interviews | <ul style="list-style-type: none"> 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, 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. | Reference: See Annex VII for tips on management interviews. |
| No. | Management Interviews: Virtual Requirements: | Guidance | Recommendations/ Examples |
| 4.3.4.2 | Management does not need to be present at the facility for virtual management | <ul style="list-style-type: none"> The interviews can happen at a place that best suits the interviewee. | |

As you can see in Figure 2, the numbers of the **Core** and **Virtual** requirements are not sequential since the Core requirement first appeared in Section 3 (SLCP Onsite Verification) and maintains the original numbering. The table example shows what requirement is core (common between onsite and virtual + onsite) and what requirement is specific to virtual activity for Virtual + Onsite Verification. This is evident through the different colors for “Core” (**dark red**) and “Virtual” (**green**). Both “Core” and “Virtual” requirements are mandatory and must be met by the Verifier conducting an SLCP “Virtual + Onsite Verification”.

Note: If the Verifier/ Verifier Body cannot adhere to the requirements listed in this Protocol (all requirements mandatory for the type of SLCP verification) the Verifier/ Verifier Body must submit an [Exception Request](#) to the Verification Oversight Organization.

[Return to the top.](#)

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SLCP Virtual + Onsite Verification (Core + Virtual Requirements)

4.2. Pre-virtual + Onsite Verification

4.2.1. Planning the Verification

| No. | Core Requirements | Guidance | Recommendations/ Examples/ References |
|---------|--|--|--|
| 3.2.1.1 | Onsite portion of the Verification must be started within two (2) months of the self-assessment completion date | <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 onsite 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 | Recommendation: Schedule the onsite verification at a time where at least 80% of the workforce is active, i.e., to avoid scheduling the verification during very low volume or holiday seasons. |
| 3.2.1.2 | VB must confirm if any major changes to the workforce are permanent (e.g., terminations) or temporary (e.g., furloughs) so as to determine onsite time needed for verification | <ul style="list-style-type: none"> If changes in workforce are temporary, then furloughed workers must also be considered when determining the amount of onsite time. Onsite time is based on the facility's current workforce (workforce at the time of onsite verification). Changes to the workforce due to COVID-19 may impact the amount of time VBs spend on site. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>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.</p> </div> <ul style="list-style-type: none"> If at time of arrival at the facility the scope of the verification increases in person-days due to changes in facility circumstances, then the Verifier needs to immediately alert the VOO at slcp@sumerra.com. If the Verifier/VB cannot extend the onsite time, then they proceed as scheduled, but the Verifier must make explicit note in the Verification/ Assessment Details | 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. |

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| | | how they deviated from the Verification Protocol. | |
| 3.2.1.4 | The facility and the VB must agree on and have a documented agreement outlining the specified date or date range for onsite verification | <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. | Reference: Please refer to the Verification Observation Requirements on our Helpdesk. |
| 3.2.1.5 | 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 | <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. | |

| No. | Virtual Requirements | Guidance | Recommendations |
|----------------|--|--|-----------------|
| 4.2.1.1 | 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. | |
| 4.2.1.2 | Facilities choosing Step 1 with 100 or less workers are not permitted to engage in virtual verification activity | <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. | |
| 4.2.1.3 | Execution of virtual verification activity must always be announced | <ul style="list-style-type: none"> • 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. | |

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| 4.2.1.4 | Verifier and the facility must discuss the IT systems and other requirements needed to support the virtual verification activity | <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): <ul style="list-style-type: none"> – Ping<100 ms – Jitter<30 ms – Speed should be at least 10Mbps |
| 4.2.1.5 | VB must discuss with the facility any information security and confidentiality issues that may arise from remote sharing of documents, records, and private information pertaining to workers | <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. |
| 4.2.1.6 | Virtual verification for documentation review must use one of the approved remote sharing mechanisms | <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 <div data-bbox="1646 774 1993 997">Recommendation: 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.</div> |
| 4.2.1.7 | Virtual verification activity for opening and closing meetings, document review, walkthrough | <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) <div data-bbox="1646 1284 1993 1380">Recommendation: SLCP recommends that the VB use videoconferencing software</div> |

| | | | |
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| | or interviews must be conducted using videoconference software | <ul style="list-style-type: none"> – 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 | 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. |
| 4.2.1.8 | Verifier must confirm relevant facility staff have the ability to share screens if record review should take place via screen sharing | <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 • This must be determined before the virtual verification activity begins | |
| 4.2.1.9 | 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. | <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. | |
| 4.2.1.10 | Verifier must obtain a map of the facility to enable any virtual walkthrough activity and ensure all applicable facility areas are visited virtually or with onsite walkthrough | <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) is covered during the virtual walkthrough. • Where it is not possible to cover the entire facility during the virtual walkthrough then an onsite walkthrough is required. | |
| 4.2.1.11 | Verifier must conduct the virtual verification without an | <ul style="list-style-type: none"> • To facilitate smooth virtual communication with management (opening meeting, management interviews, | |

interpreter

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.**

[Return to the top.](#)

4.2.2. Assigning a Verifier

| No. | Core Requirements | Guidance | References |
|---------|--|--|---|
| 3.2.2.1 | The VB must ensure all rules for Verifier selection are enforced | <ul style="list-style-type: none"> • 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. | |
| 3.2.2.2 | The VB must follow verification person-day minimum requirements and must assign more than one Verifier accordingly | <ul style="list-style-type: none"> • See Table 6 for person-day minimum requirements for onsite verification activity. | |
| 3.2.2.3 | 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 | Reference: See Annex II for more information on how VBs and Verifiers are designated eligible for a specific facility. |
| No. | Virtual Requirements | Guidance | |

4.2.2.1 The Verifier(s) conducting the virtual activity must also be involved in the onsite activity

- 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.
- 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.
- 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.
- **Examples of permitted assignments:**
 - Example A: 4 person-day verification with two Verifiers
 - Day 1
 - Verifier A = Virtual
 - Verifier B = Onsite
 - Day 2
 - Verifier A = Onsite
 - Verifier B = Onsite
 - Example B: 4 person-day verification with three Verifiers
 - Day 1
 - Verifier A = Virtual
 - Day 2
 - Verifier A = Onsite
 - Verifier B = Onsite
 - Verifier C = Onsite.

[Return to the top.](#)

4.2.3. Assigning Person-days

| No. | Core Requirements | Guidance |
|---------|---|--|
| 3.2.3.1 | The number of calendar days for onsite verification must not exceed 4 consecutive working days | <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. |
| 3.2.3.2 | Trainees, assistants or other individuals who are not SLCP approved Verifiers cannot count toward the person-day requirement | <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. |
| 3.2.3.3 | Person-day requirements may only be decreased if virtual verification activity takes place and in accordance with virtual verification requirements | <ul style="list-style-type: none"> Step 1 person-day listing in Table 6 is a minimum requirement for onsite verification and must be followed. 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. 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. |
| No. | Virtual Requirements | Guidance |
| 4.2.3.1 | 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 . | <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 activities that require more than 4 calendar |

days must involve 2 Verifiers.

| | |
|---|---|
| <p>4.2.3.2 All virtual verification activity must be completed before the onsite verification activity</p> | <ul style="list-style-type: none"> Although every effort should be made in the planning stage 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>4.2.3.3 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"> 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. 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 and will depend on scope of selected activities, facility circumstances and their self/joint-assessment data. |
| <p>4.2.3.4 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 is spot-checked by the VOO, and the increment allows them to check the accuracy of person-day calculations more easily. 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. |

[Return to the top.](#)

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

| No. | Core Requirements | Guidance | Recommendations |
|----------------|---|--|---|
| 3.2.4.1 | VB and Verifiers must follow Table 6 (below) in calculating on-site person-days, number of interviews and the sample of documents to review for onsite verification | <p>Table 6:</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 product or directly involved in the operations of the facility). They are non-supervisory. Which means, no one reports to them. Time 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. | <p>Recommendation: Step 2 and Step 3 person-day listings in Table 6 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</p> <p>Recommendation: VB adds additional onsite time if any of the following conditions apply:</p> <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. |
| 3.2.4.2 | If more than one Verifier is present and Verifiers were not present each day, Verifier must note in Verification/Assessment Details the name of Verifier present on which day | <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/ Assessment Details section of the report | |

| No. | Virtual Requirement | Guidance |
|---------|--|---|
| 4.2.4.1 | Verifier must follow Table 6 below if conducting virtual wages/ hours records review | <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. Verifiers are permitted to review documentation virtually or remotely as long as it is appropriate, sufficient and in compliance with applicable data privacy regulations; However, those personnel records reviewed virtually do not count toward the required minimum |

Table 6: Minimum number of onsite worker interviews and personnel records review, followed by sample of wage and hours records permitted when conducting virtual verification activities.

| <u>Minimum number of onsite worker interviews and personnel records review permitted for virtual activities</u> | | | | | | | |
|---|------------------------------|-----------------------------------|-----------------|----------------------|---|---|----------------------|
| Number of Workers | Individual Worker Interviews | Number of Group Worker Interviews | Personnel Files | Wage & Hours Records | Minimum requirement Person-Days (Step 1) | 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 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** |

| Sample of wage and hours records permitted for virtual verification | | | |
|---|---|---|---|
| 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. Facilities choosing Step 1 with 100 or less workers are not permitted to engage in virtual verification activity. | 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 |

^ 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](#)).

[Return to the top.](#)

4.2.5. Review of Self/Joint Assessment

| No. | Core Requirements: | Guidance |
|---------|--|---|
| 3.2.5.1 | The Verifier must study the self/joint-assessment completed by the facility to prepare for the onsite verification | <ul style="list-style-type: none"> 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). |
| 3.2.5.2 | 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 | <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. |
| 3.2.5.3 | Verifier must ensure the self/joint-assessment contains at minimum 3 months of operation/3 months of self-assessed data | <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. |
| 3.2.5.4 | Verifier must review self/joint-assessment answers to ensure only English was used for Facility Self/Joint-Assessment Responses (unless the question explicitly asks for local language) | <ul style="list-style-type: none"> It is in the VB's/Verifier's interest to ensure all Facility Self/Joint-Assessment Responses are in English, because if the Facility Self/Joint-Assessment Responses are not in English, the Verifier will have to provide the English response in Assessor/Verifier Explanation for users to understand the Final Response. This means the Verifier is spending time translating the Facility Self/Joint-Assessment Responses. Accredited Host checks are required to detect non-English language and direct the facility to update the Facility Self/Joint-Assessment Response to English. However, technical failures can occur. If the self/joint-assessment contains non-English Facility Self/Joint-Assessment 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 Facility Self/Joint-Assessment Responses. There are only two questions that ask for local language facility responses, if applicable. |
| 3.2.5.5 | VB and Verifier must obtain relevant social and labor | <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 |

| | |
|---|--|
| <p>information related to specific conditions within the country and region of SLCP verifications</p> | <p>Conventions:</p> <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) <ul style="list-style-type: none"> • Further resources provided by the ILO for labor law are: Industrial Relations Database and Working Conditions Laws Database. |
| <p>3.2.5.6 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. |

[Return to the top.](#)

4.2.6. Communication with Facility

| No. | Core Requirements | Guidance | Recommendations/ References |
|---------|--|--|--|
| 3.2.6.1 | 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 | <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, basic 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 if 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 days of the verification assessment) the facility may provide additional information after the onsite verification, and the facility can only provide additional information up to 2 working days after onsite verification. Normal Protocol requires the facility to have all information ready during 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. 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 | <p>Reference: 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/helptdesk</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</p> |

shared, the VB can properly assess verification requirements and include them in the verification information required 10 working days before verification starts.

3.2.6.3 During the scheduling process, the VB must discuss with the facility any changes in their workforce due to COVID-19 or other exceptional circumstances

- 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

Recommendation: Closer to verification, VBs should ensure that processes on which the facility self-reported will be in operation during verification (e.g., if certain parts of what the facility does are not operational, the verification should not take place).

- 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.
- 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)

| No. | Virtual Requirements | Guidance |
|---------|--|--|
| 4.2.6.1 | 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 | <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 A Guide to Virtual + Onsite Verification for Facilities which provides Verification Protocol information about virtual + onsite activities in easy format for facilities. • 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. |
| 4.2.6.2 | Verifiers must attach the Verification Plan to Validation | <ul style="list-style-type: none"> • The Verifier need only do this for Validation Methods that include virtual verification activity: <ol style="list-style-type: none"> 1. SLCP Virtual + Onsite Verification |

| | Method question VD-VERI-1 via the AH platform. | 2. SLCP Full Virtual Verification |
|---------|--|---|
| 4.2.6.3 | Verifiers must have facility permission if Verifiers want to record the virtual verification sessions | <ul style="list-style-type: none"> Verifiers may not record the virtual verification sessions unless the facility has given written permission. 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. |
| 4.2.6.4 | Verifiers are not permitted to record interviews | <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. |
| 4.2.6.5 | 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 | <ul style="list-style-type: none"> Scheduling key IT requirements would have already been discussed to ensure virtual verification activity is feasible 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. |
| 4.2.6.6 | 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 | <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). |
| 4.2.6.7 | Verifier must conduct a pre-verification meeting using the videoconferencing software that will be used during the virtual verification activity | <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 |

[Return to the top.](#)

4.3. Virtual + Onsite Verification

4.3.1. General

| No. | Core Requirements | Guidance | Recommendations/ References |
|----------------|-------------------------------|---|--|
| 3.3.1.1 | Verifier must verify all data | <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) <p>Even if the facility did not provide an answer to the applicable question, the Verifier has to verify the correct answer</p> <p>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.</p> <div> <p>Note: The Verifier must still provide the Assessor/Verifier Response and supporting Assessor/Verifier Explanation to these unanswered questions.</p> </div> | <p>Reference: See Verifier Guidance for more details.</p> |

3.3.1.2 The timeframe of the Assessor/Verifier Explanation must be based on the same previous 12 months from the date that the self/joint-assessment is completed by the facility

- 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”.
- **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)).**

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 Self/Joint-Assessment 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 Self/Joint-Assessment Response as Inaccurate - Incorrect and provide details in Assessor/Verifier Explanation. Any observation the Verifier makes on site to contradict a Facility Self/Joint-Assessment Response suggests that it is not an isolated practice and must be included as part of the 12-month assessment.

3.3.1.3 Each verification must cover the area as defined by the facility in the Facility Profile of the self/joint-assessment and all operations included therein

- **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.
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.
- **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 (FP-BAS-1) will

Reference: Please see the [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.

Reference: For additional guidance and clear requirements on assessments related to a facility’s business license in all countries where SLCP is operational, see <https://slcp.zendesk.com/hc/e>

| | | |
|---|---|---|
| | <p>have multiple entries when the facility opts in for one assessment only. The facility must provide the multiple business license names as the Facility Self/Joint-Assessment Response. The facility must treat the multiple business licenses as one facility, meaning the number of workers shall be all business licenses combined.</p> <ul style="list-style-type: none"> • Physical scope: workers’ housing/ dormitories: Only housing used by workers (does not have to be exclusive to workers) is within the 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. • Building/construction, structural safety and fire permits and certificates must cover all structures and any additions made to the facility, including any canteen and childcare facilities, as applicable. If any documents are missing or do not cover all structures, the Verifier must select ‘Inaccurate - Incorrect’ and provide all relevant details in the ‘Assessor/Verifier Explanation’ field (e.g., <i>HS-BUI-1: Are building/construction, structural safety and fire permits and certificates in line with legal requirements?</i>). If there are no applicable legal requirements, answer No applicable legal requirements. | <p>n-us/articles/360012552213-What-are-the-rules-around-creating-facility-profiles-on-the-Gateway-</p> |
| <p>3.3.1.4 Any verification activity must comply with all applicable data privacy laws and regulations</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>3.3.1.5 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 | <p>Recommendation: In the event that Verifiers suspect potential issues among workers in the facility, Verifiers should also check third-party service providers working indirectly</p> |

unspecified duration with no guarantee of continuation), temporary (e.g., labor supplied by a third-party employment agency).

on the product and therefore not included in the worker scope for SLCP purpose. These workers are non-production workers. They may show more clearly the situation. Examples of such workers are those working in food service, security, childcare, and custodial.

3.3.1.6 Verifiers must cross-check information from observation and documentation review with information gathered from both management and workers' interviews to understand how workers are affected by various situations

- **The general principle of “triangulation” applies to the verification activity just as it applies to traditional social auditing.**
- The method of triangulation in data analysis draws on multiple methods of data sources (3 or more pieces of evidence/ difference sources) to develop a comprehensive understanding of a situation.
- All supporting documentation (e.g., photos, worker engagement question set, etc.) must be used to cross check information provided in the self-assessment and to highlight any areas in need of further attention.

Reference: See [Verifier Guidance](#) for more details and examples on triangulation.

| No. | Virtual Requirements | Guidance |
|----------------|---|---|
| 4.3.1.1 | 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) | <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 |

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| | | <ol style="list-style-type: none"> 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 |
| 4.3.1.2 | Validation Method selection: Verifiers must select Validation Method: “SLCP Virtual Verification” for each data point verified virtually. | <ul style="list-style-type: none"> • There is a new field “Validation Method” in the online Tool for Virtual + Onsite Verification in which the default setting is “SLCP Onsite Verification”. If the data point is verified virtually, the Verifier must change the selection to “SLCP Virtual Verification. If the data point is verified onsite, the Verifier need not change anything because the default setting is “SLCP Onsite Verification”. • The new field “Validation Method” appears for each data point once the Verifier selects the Validation Method “SLCP Virtual + Onsite Verification” for VD-VERI-1. |
| 4.3.1.3 | Verifiers must thoroughly document virtual information gathering to facilitate cross-checking of information with (further) onsite management interviews, (further) onsite documentation review, (further) onsite walkthrough and workers interviews which are only permitted onsite | <ul style="list-style-type: none"> • 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 • 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 Assessor/Verifier Explanation narrative of the Tool. |

[Return to the top.](#)

4.3.2. Opening Meeting

| No. | Core Requirements: | Guidance |
|---------|--|---|
| 3.3.2.1 | The onsite verification must start with an opening meeting | <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. 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. |
| 3.3.2.2 | Authorization to take pictures must be requested | <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/ screenshot sensitive (i.e., proprietary) products, materials or processes. If photo/ screenshot 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/ screenshots and yet agree to take photos/screenshots themselves on behalf of the Verifier, this must be noted in the report along with any incidences where the Verifier did not receive pictures/ screenshots they requested. |
| 3.3.2.3 | Verifier must inform management that the Verifier selects the workers to interview | <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. |
| 3.2.2.4 | If applicable, Verifiers must inform management they wish to interview the head of the union(s) and worker representative(s) | <ul style="list-style-type: none"> This should already have been scheduled and included in the verification plan. |

| No. | Virtual Requirements: | Guidance | Recommendations |
|---------|--|--|--|
| 4.3.2.1 | Verifiers are permitted to conduct the full opening meeting virtually in place of the onsite opening meeting | <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 | |
| 4.3.2.2 | Virtual opening meeting must be conducted using videoconference software | <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) <p>The type of videoconferencing software to be used must be agreed upon by the VB and the facility</p> | <p>Recommendation: 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> |

[Return to the top.](#)

4.3.3. Walkthrough

| No. | Core Requirements: | Guidance |
|---------|---|---|
| 3.3.3.1 | Verifier must take time to first look at the 'big picture' before focusing on the detail | <p>See Annex VII for tips on the onsite walkthrough.</p> <p>Examples of items to look for to understand the 'big picture':</p> <ol style="list-style-type: none"> 1. People being ushered out of the workplace (e.g., children, or those without contracts) 2. People being moved within the workplace (e.g., young people doing hazardous work or pregnant women working with chemicals being moved) 3. Things being hastily hidden (chemicals in the general work area), or doors being quickly locked or unlocked 4. PPE being hastily put on 5. 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). |
| 3.3.3.2 | Verifier must inform the facility about any inaccuracies during the verification | <ul style="list-style-type: none"> • Throughout the verification, the Verifier informs facility management about any inaccuracies, notable Assessor/Verifier Explanation 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 Self/Joint-Assessment 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. |
| 3.3.3.3 | Verifier must follow any applicable facility Health & Safety protocols | <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 Health & Safety rules, e.g., social distancing when conducting verifications |
| No. | Virtual Requirements: | Guidance |
| 4.3.3.1 | Onsite walkthrough is still required on a sampling basis (virtual walkthrough is permitted to reduce but not eliminate onsite | <ul style="list-style-type: none"> • 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. |

walkthrough activity).

4.3.3.2 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

- 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 must 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 (while following requirement for facility permission, privacy and confidentiality and the use of videoconference software)
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[Return to the top.](#)

4.3.4. Worker and Management Interviews

| No. | Worker Interviews: Core Requirements | Guidance | References |
|---------|---|---|---|
| 3.3.4.1 | Verifier must meet or exceed the minimum number of worker interviews | <ul style="list-style-type: none"> Sample size for onsite verifications is based on Table 5 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/Assessment Details section of the Tool as to why they did so. | |
| 3.3.4.2 | Verifier must interview a representative sample of workers | <ul style="list-style-type: none"> The Verifier must consider both the types of contracts and types of people in the workforce. | Reference: See Annex VII for more information. |
| 3.3.4.3 | Verifier must interview the trade union and/or worker representative (if applicable to the facility) | <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) – 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 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. | |
| 3.3.4.4 | Worker interviews are strictly confidential and subsequent reports will not identify the names of interviewees nor their individual responses | <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). | |

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|---|---|
| | <ul style="list-style-type: none"> • Verifiers may keep a confidential record of those with whom they have had interviews if VB requires. • Interviews must take place away from management and supervisors in a room or space where interviewees feel comfortable sharing sensitive information. |
| 3.3.4.5 Interviews must take place in a language understood by workers either with additional Verifiers or onsite interpreters | <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; 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. • The Tool asks for primary, secondary and third most prevalent language spoken by workers, as well as the primary language spoken by facility management. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>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.</p> <p>See Examples in Verifier Guidance.</p> </div> |
| 3.3.4.6 The verification team must be able to support at least the top two languages spoken by workers and the primary language spoken by management | <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. • See examples in Verifier Guidance. • The facility has the right to insist on following a higher standard and requiring more language capability. |
| 3.3.4.7 Interpreters must be independent of the facility | <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 |

and trained to understand
social compliance topics

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.

| No. | Worker Interviews: Virtual Requirements: | Guidance | |
|---------|--|--|--|
| 4.3.4.1 | Worker interviews are NOT permitted to be conducted virtually within the Validation Method of Virtual + Onsite Verification. | <ul style="list-style-type: none"> • All worker interviews conducted for Virtual + Onsite Verification must be conducted onsite. | |
| No. | Management Interviews: Core Requirement | Guidance | Reference |
| 3.3.4.8 | Verifiers must conduct management interviews | <ul style="list-style-type: none"> • 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, 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. | Reference: See Annex VII for tips on management interviews. |
| No. | Management Interviews: Virtual Requirements: | Guidance | Recommendations/ Examples |

4.3.4.2 Management does not need to be present at the facility for virtual management interviews to take place

- The interviews can happen at a place that best suits the interviewee.

4.3.4.3 Virtual verification activity for management interviews must be conducted using videoconference software

- The videoconference software used must support:
 - 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
 - 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
 - **Recommendation:** VB should 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.
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4.3.5. Document Review

| No. | General: Core Requirements | Guidance | Examples |
|---------|--|---|--|
| 3.3.5.1 | Verifiers must review documents to understand the facility's procedures and to verify specific claims about how the workforce is managed | <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. 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. 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. 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 to include details on policies so end users can analyze the information in relation to their own codes. <div> <p>IMPORTANT: The Facility Profile Gateway data will be updated with the final verified data.</p> <p>Therefore, it is very important that the Verifier checks and verifies the facility data, especially the OAR/OS ID and business license number because users will reference this data through the Gateway public facility data to identify facilities in their supply chain or program.</p> </div> | <p>Example of full policy document review: 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.</p> |

| No. | General: Virtual Requirements: | Guidance | Examples |
|---------|---|---|---|
| 4.3.5.1 | Verifiers are permitted to review documentation virtually or remotely as long as it is appropriate, sufficient and in compliance with applicable data privacy regulations | <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. <ul style="list-style-type: none"> 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 6 will not be reduced if this virtual activity occurs. The number of personnel records to be reviewed is for onsite review only. 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. It is the responsibility of the Verifier to ensure that certain documents best checked onsite should not be checked virtually. The Verifier does not need to re- | <ul style="list-style-type: none"> Example of questions related to review of wage/ hours records: 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. Example of onsite document review vs. virtual document review: 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. Example of checking documents are kept onsite: 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 |

| | | 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. | and procedures checked onsite. |
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| 4.3.5.2 | During onsite verification, Verifiers must ensure that policy documents shared virtually are physically available onsite | <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. | |
| 4.3.5.3 | Verifier is not permitted to record virtual document review and must ask for permission to take screenshots during opening meeting or pre-verification meeting | <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. | <ul style="list-style-type: none"> Examples of instances for document/photo attachments are noted in the Verifier Guidance |
| No. | Wage and Hours records: Core Requirements: | Guidance | Reference |
| 3.3.5.2 | 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- | <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> | <ul style="list-style-type: none"> Reference: For examples of what do to when reviewing wages and hours see Verifier Guidance. |

| | assessment data. If closure of production happened, the pay period during/ after closure must also be included. | <ul style="list-style-type: none"> The Verifier may extend the sample within the 12-month assessment period if s/he think it necessary to substantiate the verification. 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). | |
|----------------|--|---|--|
| 3.3.5.3 | 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. | <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> Reference: For examples of how to record more than one unit of pay in the facility see Verifier Guidance. |
| No. | Wage and Hours records: Virtual Requirements | Guidance | |
| 4.3.5.4 | 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 | <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. | |
| 4.3.5.5 | Worker records review can occur beforehand virtually but the sample of total | <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. The Verifier may decide [...] to concentrate a review of personnel files or payroll on a set of specific workers or | |

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| | number of workers to interview and records to review is still as per Table 6. All worker interviews must occur onsite. | <p>on those persons with the highest/ lowest hours or wages per pay period. That decision is at the discretion of the Verifier.</p> <ul style="list-style-type: none"> • 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. • Triangulation of information is still key, and thus the majority of wage/ hours records review should be of those workers who were interviewed 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 6 |
| 4.3.5.6 | Verifier must include a “real time” review of working hours/ wage/ personnel records | <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 the three pay periods required and interviewing the representative sample of workers. • If virtual working hours/ wage/ personnel records review is feasible, Table 6 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. |
| 4.3.5.7 | Verifier must select half of the workers included in the virtual record review for onsite interviews | <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. |

[Return to the top.](#)

4.3.6. Document and Photo Attachment

| No. | Core Requirement | Guidance | Examples |
|----------------|---|--|--|
| 3.3.6.1 | Verifiers must include specific photographic/ screenshot evidence and/or documentation attached to questions of the Tool, selecting the question that best fits | <ul style="list-style-type: none"> At minimum, Verifiers must include photographic/ screenshot 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 - Incorrect” 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 “Assessor/Verifier Selection” Photographs/ screenshots 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/ screenshots/ documentation is only possible through the online | <p>For examples of instances for document/ photo/ screenshot attachments see Verifier Guidance.</p> |

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/Assessment 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/ screenshots 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.

[Return to the top.](#)

4.3.7. Pre-Closing Meeting

| No. | Core Requirement: | Guidance | Reference |
|----------------|--|---|---|
| 3.3.7.1 | Prior to the closing meeting, the Verifier must take the time to complete all “Inaccurate - Incorrect”, “Non-Compliance” (for Verification Summary) and “Updated during Verification” items to prepare for the closing meeting | <ul style="list-style-type: none"> • If the Verifier has not already completed all “Inaccurate - Incorrect”, “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 and may have to skip some entries in the Verification Summary or just provide highlights to the facility. | Reference: More information about how to complete the Verification Summary is in the Verifier Guidance . |

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| 3.3.7.2 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 | <ul style="list-style-type: none">• This will help the Verifier gather any further information related to differences between the original self/joint-assessment data and the verified data. |
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[Return to the top.](#)

4.3.8. Closing Meeting

| No. | Core Requirement: | Guidance | Reference |
|---------|---|--|--|
| 3.3.8.1 | The onsite verification must end with a closing meeting | <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.• 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. | Reference: See Verifier Guidance for closing meeting agenda recommendations |

| | |
|---|---|
| <p>3.3.8.2 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, to help the facility identify 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. |
| <p>3.3.8.3 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 reporting. For example, SLCP does not prohibit the VB from sending zero tolerance/ critical issue reports immediately after 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>3.3.8.4 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. • 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 Requirements 3.4.1.1. If concerns relate to Verifier following Verification Protocol and/or Verifier conduct, then the facility can raise a Dispute, see 2.11.8. <div data-bbox="638 1045 1904 1243"> <p>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.</p> </div> |

[Return to the top.](#)

4.4. Post-virtual + Onsite Verification

4.4.1. Addressing Facility Concerns

| No. | Core Requirement | Guidance |
|---------|--|--|
| 3.4.1.1 | Verifier must address facility concerns brought up during the verification/ closing meeting within two days (48 hours) from end of verification and address any applicable requests for edits by the facility within the 14-calendar day review period in VRC. | <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 2.11.8. • The Verifier may have to review further documentation or conduct remote interviews due to exceptional circumstances during 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 must offer the facility the option to include their concerns in the applicable Assessor/Verifier Explanation field along with an explanation from the Verifier why the Verifier did not make edits to the final report. <div> <p>Note: The 48 hours is not for the facility to change the verification outcome by writing-up a document after verification, nor is the 48 hours for the facility to make corrections to proven/ confirmed verification outcomes.</p> <p>Important: Any legal non-compliance or inaccuracy determined at time of verification needs to be noted as a non-compliance and/or inaccuracy for the verification. If the facility makes a correction before the end of the verification, the Verifier can make a note in Assessor/Verifier Explanation 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.</p> </div> |

[Return to the top.](#)

4.4.2. Verified Assessment Report Revision

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.4.2.1 | Any changes the Verifier makes to the report after completion/ during the facility review phase must be agreed upon by the facility | <ul style="list-style-type: none"> 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. |
| 3.4.2.2 | 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. |
| 3.4.2.3 | 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 | <ul style="list-style-type: none"> 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”. |

[Return to the top.](#)

4.4.3. Report Writing: Assessor/Verifier Selections and Entries

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.4.3.1 | Assessor/Verifier Selection must be completed correctly following the specific rules explained in the column “Guidance” | <p>There are six (6) Assessor/Verifier Selection options for the Verifier to manually select and three (3) automated verification options that are automatically made for the Verifier by the Tool.</p> <p>The rules on what Assessor/Verifier Selection to choose are as follows:</p> <ol style="list-style-type: none"> 1. Accurate: Information provided by the facility is 100% correct and supported by data. 2. 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. 3. Inaccurate – Incorrect: Information provided by the facility has one or more errors because facility made a mistake or did not share accurate/ honest data (e.g., business license is actually not valid anymore). This Assessor/Verifier Selection is chosen if: <ul style="list-style-type: none"> – 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) – If there is a lack of documentation that does not permit accurate verification of specific questions 4. Inaccurate – Misunderstanding: To be selected by the Verifier when the facility has misunderstood the question (e.g., wrong understanding of “worker” and including supervisors in the calculations of total number of workers) and provided an Inaccurate Facility Self/Joint-Assessment Response. <ul style="list-style-type: none"> – SLCP provides the Verifier with all definitions and explanations in “More Info”. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Note: 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 Assessor/Verifier Explanation field.</p> <p>The Assessor/Verifier Response option is not applicable for Follow-up Questions where the facility provides a description. Therefore, the Assessor/Verifier Response field is whited out. Since all Follow-up Questions have free</p> </div> |

narrative answers; the Assessor/Verifier Explanation field is sufficient to offer an opportunity for the Verifier to provide the correct information and additional details on the facility's circumstances, if necessary.

5. **Facility did not reply during SA/JA:** This means that the facility did not provide a response at all.

This feature is automated. The Verifier does not need 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 (available for onsite verification only), the AH completes the "Facility did not reply during SA/JA" Assessor/Verifier Selection before the Verifier opens the offline Tool.

Note: In the offline Tool (available for onsite verification only) dark grey fields indicate that the facility has not provided a response. When the facility provides a response, the color changes to light grey. For dark grey fields not answered by the facility, **the Verifier must still enter the Assessor/Verifier Response and provide Assessor/Verifier Explanation to support the Assessor/Verifier Response.**

6. **Not visible to facility during SA/JA:** The Assessor/Verifier Response opens up conditional questions not previously visible for the facility to answer during self/joint-assessment, and therefore the Facility Self/Joint-Assessment Response is blank. See example in Example column.

This feature is automated. The Verifier does not need to select "Not visible to facility during SA/JA" as it is automatically done for the Verifier in the online and offline (available for onsite verification only) version of the Tool.

Note: Automated Assessor/Verifier Selections may be overridden by the Verifier, i.e., the Verifier can manually change an automated Assessor/Verifier 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.

7. **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 Assessor/Verifier Selection is chosen by the Verifier, then the Assessor/Verifier Response column remains blank and must not be completed because the question is not applicable.
8. **No longer applicable due to verification:** The Assessor/Verifier Response makes the conditional questions that were answered (or not answered) by the facility in the self/joint-assessment no longer applicable.

This feature is automated. The Verifier no longer needs to select “No longer applicable due to verification” as it is automatically done for the Verifier in the offline and online version of the Tool.

The Verifier does not need to provide an explanation in Assessor/Verifier Explanation. Once this option has been automatically selected the Assessor/Verifier Response column remains blank because the question is not applicable. For the user of the verified data the Assessor/Verifier Selection alone 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 Assessor/Verifier Response AND also if the Assessor/Verifier Selection of the parent question is “Not applicable due to special facility circumstances.”

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

See the Verifier Guidance for examples of when to use different responses and for more details.

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| <p>3.4.3.2 Depending on the Assessor/Verifier Selection, other verification fields must be completed/cannot be left blank</p> | <p>See</p> <ul style="list-style-type: none"> Table 7 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>3.4.3.3 Assessor/Verifier Explanation must be supported by photos/ attachments where feasible</p> | <p>See last column “Photo/ File upload to AH” in</p> <ul style="list-style-type: none"> Table 7 for when attachments are required Support material is required (if feasible) where the Assessor/Verifier Selection is “Inaccurate - Incorrect” and if there is a “Non-Compliance” |

3.4.3.4 Verifier must adhere to applicable data privacy regulations

- 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
- If facility does not permit photographs due to confidentiality, then please note in report under the Verification/Assessment 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.

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

[Return to the top.](#)

Table 7: Requirements for Completion of Verification Fields

| Assessor/Verifier Selection | Assessor/Verifier Response | Assessor/Verifier Explanation | 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” ³ | 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 Assessor/Verifier Explanation, then must upload |
| Inaccurate - Incorrect selected | NEVER BLANK Must select or fill in | NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Incorrect and 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 | MUST UPLOAD if proof/ documentation available |

³ 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 section 2.9.1 [Identifying and citing when facility is not in line with legal requirements.](#)

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|---|---|--|---------------|--|---|
| Inaccurate - Misunderstanding selected | NEVER BLANK Must select or fill in | NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Misunderstanding and share facility details so users of the verified data can make corrective action plans as necessary. Information helps SLCP to continuously improve. | As applicable | If Non-Compliance selected, must fill in narrative | MUST UPLOAD if proof/documentation available |
| Facility did not reply during SA/JA automatic selection | 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 automatic selection | 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 |

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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 | | | would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload |
| Not applicable due to special facility circumstances selected | | <p>NEVER BLANK</p> <p>Must fill in narrative to explain why there is a special facility circumstance that results in the Assessor/Verifier Response not being applicable</p> | | | If proof/ documentation available to emphasize a point shared in Assessor/Verifier Explanation, then must upload |
| No longer applicable due to verification automatic selection | | Verifier can choose to leave comments | | | |
| Verification not Required | | Verifier can choose to leave comments | | | |

[Return to the top.](#)

4.4.4. Report Writing: Assessor/Verifier Explanation

| No. | Core Requirements | Guidance |
|---------|---|--|
| 3.4.4.1 | Verifiers must provide details in “Assessor/ Verifier Explanation” that clearly explain the reason for the specific Assessor/ Verifier Selection and provide users of SLCP data with necessary information to inform post SLCP steps (including grading, certification and corrective action plans) | <ul style="list-style-type: none"> • If Assessor/Verifier Selection is “Accurate”: there may be circumstances which make the situation unique or irregular. In these cases, the Verifier must provide additional information in Assessor/Verifier Explanation (e.g., India’s Variance Dearness Allowance (VDA)). See detailed examples and situations in Verifier Guidance. • If Assessor/Verifier Selection is “Inaccurate - Incorrect”: the user of the data needs to understand what the accurate situation is (Assessor/Verifier Response) and why the situation was not captured accurately by the facility in the self/joint-assessment (Assessor/Verifier Explanation). <ul style="list-style-type: none"> – Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation 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 Assessor/Verifier Selection is “Inaccurate - Misunderstanding”: the Verifier must provide the Assessor/Verifier Response along with the Assessor/Verifier Explanation that clearly states the reasons why the facility misunderstood the question. Detailed and clear Assessor/Verifier Explanation is also critical to inform continuous improvement of SLCP processes. <ul style="list-style-type: none"> – Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation 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 Assessor/Verifier Selection is “Updated during Verification”: If Facility Profile responses need to be updated the |

Verifier must provide details for the update in Assessor/Verifier Explanation. Reasons provided by the Verifier can be a simple explanation like something changed between the date of self-assessment and verification. **See Example “Updated during verification” in [Verifier Guidance](#).**

- 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 Assessor/Verifier Explanation must explain that the facility addresses the issue regardless of the absence of legal requirements.
- If the Final Response shows a result that according to Verifier’s social auditing experience would normally result in a code of conduct or standard non-compliance (no matter if the Assessor/Verifier Selection is Accurate or Inaccurate), Assessor/Verifier Explanation must include details so that the user of the report can better inform remediation efforts. **See [Verifier Guidance](#) for example.**
- **If Facility Self/Joint-Assessment 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.
- **If the Assessor/Verifier Selection is “Facility did not reply during SA/JA”,** the Assessor/Verifier Explanation must be a short statement of what information was reviewed to support the Assessor/Verifier 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.” **See [Verifier Guidance](#) for example.**

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.

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

- 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-

| | |
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| | <p>Assessor/Verifier Explanation</p> <p>Compliance” AND provide the “Legal Reference”</p> <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/Assessment 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 and filling in the Legal Reference for any applicable Assessor/Verifier Selection, including Inaccurate – Incorrect, Inaccurate – Misunderstanding, Accurate, Not visible to facility during SA/JA and other selections. <p>See also information about the Law Overlay.</p> |
| <p>3.4.4.3 Temporary regulatory circumstances must also be explained in Assessor/Verifier Explanation, as applicable, and in the Verification/ Assessment 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 Assessor/Verifier Selection and Final Response, if there was a temporary regulatory circumstance this must be mentioned, as applicable, in the Assessor/Verifier Explanation and the Verification/Assessment Details section of the report.</p> |

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| <p>3.4.4.4 If the Facility Self/Joint-Assessment Response 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"> For example: “Are toilets clean, and sanitized on a regular basis?” If the Facility Self/Joint-Assessment 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>3.4.4.5 If the facility misunderstood the question, the Verifier must select Inaccurate – Misunderstanding as the Assessor/ Verifier Selection field</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 on the question. A “Misunderstanding” means that the facility did not understand the question properly. A “Misunderstanding” <u>does not mean</u> the facility misjudged the facility circumstances because they were not aware of the real situation. <ul style="list-style-type: none"> A situation of Misunderstanding: 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 Assessor/Verifier Response and “Misunderstanding” in the Assessor/Verifier Explanation field. Then the Verifier explains the misunderstanding of the facility in the Assessor/Verifier Explanation field. Not a situation of Misunderstanding: 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>3.4.4.6 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. Systemic: Issues that are purposeful, intentional, and methodical in nature that occur regularly and/or impact a significant number of workers. <p>Reference: See Verifier Guidance for examples of isolated and systemic issues.</p> |
| <p>3.4.4.7 Assessor/Verifier Explanation clearly links to the question/ data</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. |

| | | | |
|-----------------|---|--|--|
| | point | <ul style="list-style-type: none"> The statement must not be general, but specifically linked to the question being evaluated. Therefore, cutting and pasting of statements into multiple Assessor/Verifier Explanation fields is poor form. | |
| 3.4.4.8 | Assessor/Verifier Explanation is factual and without judgment | <ul style="list-style-type: none"> Assessor/Verifier Explanation 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 Assessor/Verifier Explanation, 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. | |
| 3.4.4.9 | Verifier must enter all Assessor/Verifier Explanation in English | <ul style="list-style-type: none"> The SLCP final verified assessment report is 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 translate the facility's response into English in the Assessor/ Verifier Explanation field. 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. | Reference: See Verifier Guidance for example. |
| 3.4.4.10 | Assessor/Verifier Explanation uses correct spelling and grammar | <ul style="list-style-type: none"> It is very important that the information is entered using correct spelling and grammar so the user can easily understand the verified assessment report. | |
| 3.4.4.11 | Assessor/Verifier Explanation statements must be based on the 12-month assessment period* | <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. Assessor/Verifier Explanation statements are to be based on this assessment period *The only exception is in the Facility Profile section, where the Verifier must include the most up-to-date information which may require the Assessor/Verifier Selection “Updated during Verification” | Reference: See Verifier Guidance for example. |

[Return to the top.](#)

4.4.5. Report Writing: Verification/Assessment Details

| No. | Core Requirements | Guidance | Example |
|---------|--|--|--|
| 3.4.5.1 | All fields in the Verification/Assessment Details section must be completed | <ul style="list-style-type: none"> • If the Verifier does not have any information to enter, the Verifier must still complete the field with N/A. • Verifier should pay attention to the More Info links/fields to understand what to respond to in the Verification/Assessment Details section. • The question in Verification/Assessment Details about Verification Duration must be filled in with the total number of person-days used for verification (including virtual verification). | Example–Person-days: <ul style="list-style-type: none"> – 2 Verifiers for 2 calendar days = 4 person-days. – 1 Verifier for 1 calendar day virtual and 2 Verifiers for 1 calendar day onsite = 3 person-days. |
| 3.4.5.2 | The Verifier must enter Verification/Assessment Observations about the facility if the facility engages in behavior that negatively impacts process integrity. | <ul style="list-style-type: none"> • In Verification/Assessment Details section of the Tool, v1.5 of the Tool now asks the question: <i>VD-VERI-19: 1.1 Did the facility engage in behavior that impacts process integrity (e.g., incomplete, inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?</i> • Facilities should report actual conditions and be transparent about any non-compliance with applicable legal requirements or facility practices like double bookkeeping. • Entries in this section of the report will be visible to the facility for review. The Verifier must report only confirmed findings, as stipulated in the CAF Terms of Use: “Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users.” The SLCP Signatory Charter also calls for signatories to “respect the principle of true data in SLCP verified assessments by recording and accepting honest data, and by prioritizing remediation over punishment”. • If the Verifier has any doubts about the information they are reporting in “Verification/ Assessment Observations” then the Verifier should use the confidential reporting form. See below: 4.4.10. Reporting on sensitive issues and suspicious activities outside of the Final Verified Assessment Report. | |

| No. | Virtual Requirements | Guidance |
|---------|--|---|
| 4.4.5.1 | VB must maintain all records of virtual verification activity review and maintain an accurate account of the verification plan | <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. <p>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> |
| 4.4.5.2 | The Verifier must include all information on virtual verification activity in the “Verification/ Assessment 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 | <ul style="list-style-type: none"> See example narrative for Verification/Assessment 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 <p>The question in Verification/Assessment 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.</p> |

[Return to the top.](#)

4.4.6. VB Quality Check

| No. | Core Requirement | Guidance | References/ Recommendations |
|---------|---|---|--|
| 3.4.6.1 | 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 | <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. On calendar day 5 after the assessment status changes from “Verification in Progress” (VRP) (via “Verification Quality Check” (VRQ)) 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>Reference: 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).</p> <p>Reference: Go to our Helpdesk to see which data quality checks SLCP is currently running.</p> <p>Recommendation: 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.</p> <p>Although not a requirement, SLCP highly recommends the Verifier review the VRQ check failure email and revise the report as applicable.</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.

Note: 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 prior to and after finalization. Any failures/ mistakes still in place will negatively affect the Verifier and VB score.

[Return to the top.](#)

4.4.7. VB Document Retention

| No. | Core Requirement | Guidance |
|---------|---|--|
| 3.4.7.1 | 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>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>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.</p> |

[Return to the top.](#)

4.4.8. VRF Edits

| No. | Core Requirement | Guidance | References |
|---------|--|--|---|
| 3.4.8.1 | 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. | <ul style="list-style-type: none"> 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. 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 need to work with the VOO to determine the edits that need to be made. | Reference: see the SLCP QA Manual for further details. |

[Return to the top.](#)

4.4.9. Ethics

| No. | Core Requirement | Guidance |
|---------|--|--|
| 3.4.9.1 | Accepting gifts of any value from facility managers, workers or others related to the verification is inappropriate and not permitted. | <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 The Verifier must advise their VB and contact the VOO immediately to report the incident and to 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). |

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|---|--|
| <p>3.4.9.2 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>3.4.9.3 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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[Return to the top.](#)

4.4.10. Reporting issues outside Final Verified Assessment Report

| No. | Core Requirements | Guidance |
|-----------------|--|---|
| 3.4.10.1 | 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 | <ul style="list-style-type: none"> • 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. • 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. • 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:

- 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)

See [Verifier Guidance](#) for scenarios and examples.

3.4.10.2 VBs must review information on the Gateway related to sensitive/confidential (if applicable) and share this information with the Verifier before conducting any new Verification, as the previous Verification report is not always shared.

- Facility profile note is only visible to the VBs and admins. The facility does not have visibility to the notes.
- The information shared by the VOO related to the sensitive/confidential report will be clearly displayed on the Gateway.

[Return to the top.](#)

5. SLCP Full Virtual Verification Requirements

For Full Virtual Verification, the facility must complete, at minimum, all of Step 2 in the self/ joint-assessment process. The set of data points that will be verified virtually cannot include the full set in Step 2, as some of the questions need an onsite visit for proper verification; however, requiring facilities to complete Step 2 in the self/ joint-assessment contributes to the report user having more insight into management systems. Conducting a self-assessment beyond just the full virtual verified data points will also help prepare the facility for the subsequent SLCP verification that must occur as a regular onsite verification.

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.

If a facility is experiencing a situation of force majeure, meets the eligibility requirements for a Full Virtual Verification and is asking a VB to complete a Full Virtual Verification, **then the VB/ Verifier also needs to meet a set of eligibility requirements** to conduct an SLCP Full Virtual Verification.

As all verification activity is conducted virtually during Full Virtual Verification, a number of amendments to Virtual + Onsite Verification have been made. These are outlined in Table 8 below:

Table 8: Key Revisions and Additions from Virtual + Onsite to Full Virtual

| Activities currently conducted onsite during <u>Virtual + Onsite Verification</u> | Revisions/ additions needed for transitioning to <u>Full Virtual Verification</u> |
|--|---|
| Observations of conditions in the facility– includes the work area and facility surroundings | <ul style="list-style-type: none"> • Revision: The number of questions has been reduced to adequately verify facility conditions |
| Review of working hours, wage and personnel records | <ul style="list-style-type: none"> • Revision: All review of working hours, wage and personnel records are now done remotely during virtual tour. VBs are expected to have an established data governance policy and provide evidence of appropriate security practices to adequately maintain the integrity, access permissions, and confidentiality of all data collected |
| Review of presence of policies and procedures onsite | <ul style="list-style-type: none"> • Revision: All policies and procedures must be attached to the applicable data point/ question in the self/joint-assessment; Verifier must check the completion of this requirement prior to starting the Full Virtual Verification • Addition: Verifier to request proof of presence of specific policies and procedures onsite during virtual tour. Specific documents requested will not be made known to facility prior to date of Full Virtual Verification and must be available upon request |
| Worker interviews | <ul style="list-style-type: none"> • Addition: Worker Engagement Question Set implementation with standardized SLCP question set • Revision: Requirement for management and Worker Representative/ Trade Union representative interviews • Worker interviews will not be conducted virtually as they are outside of the Full Virtual Verification scope |
| Access to all available information | <ul style="list-style-type: none"> • Addition: Verifier is granted access to and references final verified assessment report data from the immediately preceding verification for consistency of findings from virtual verification. If there is no prior SLCP verification, Verifier is granted access to all (may be several) applicable audit reports from the past 18 months. If there are no applicable audit reports, the timeframe is extended to include the most recent social audit report. |

[Return to the top.](#)

IMPORTANT: All requirements presented in this section are mandatory for Verifier Bodies and Verifiers. Guidance is provided for each requirement and must be read. Some requirements are also accompanied with recommendations and/or references to provide further support throughout the verification process. The [Verifier Guidance](#) is referenced frequently for examples and scenarios and must also be read.

Questions should be interpreted ‘literally’ unless clarified in the ‘More Info’. Verifiers are not expected to apply their own assumptions regarding intent of question.

5.1. How to read this section

Section 5 presents all mandatory requirements for the Validation Scope “SLCP Full Virtual Verification” (FVV). Full Virtual Verification requirements include the **FVV requirements specific for SLCP Full Virtual Verification** and are color coded **blue**. Full Virtual Verification Requirements are therefore presented as “**FVV**”.

A number of Core requirements are common to Virtual + Onsite Verification and Full Virtual Verification; therefore, Core requirements maintain the same numbering across all three Validation Scope sections (Onsite Verification, Virtual + Onsite Verification and Full Virtual Verification) for ease of reference and revision.

A number of Virtual requirements are common to Full Virtual Verification as well; therefore, Virtual requirements maintain the same numbering across both Validation Scope sections (Virtual + Onsite Verification and Full Virtual Verification) for ease of reference and revision.

Section 5 requirements are intended to be a standalone set of requirements for SLCP Full Virtual Verification and must be read in conjunction with Section 2 information on verification processes.

Each table of FVV requirements contains the reference number, the requirement (Core (if applicable), Virtual (if applicable) and FVV), must-read guidance, and, where relevant, a fourth column providing recommendations, some examples and/or reference links to important documents (**in particular the [Verifier Guidance](#) for examples and scenarios for specific requirements**). This information is very useful in helping the Verifier prepare for various situations and to achieve a successful verification – it should be read along with all other information in each Table.

Figure 3 below shows an example of a FVV Requirements table with core, virtual and FVV mandatory requirements.

Figure 3: Example of Tables of FVV Verification Requirements

| Reference number | Mandatory requirement. | Guidance is critical information that must be read. | |
|------------------|--|--|--|
| No. | Core Requirement | Guidance | |
| 3.3.3.2 | Verifier must inform the facility about any inaccuracies during the verification | <ul style="list-style-type: none"> Throughout the verification, the Verifier informs facility management about any inaccuracies, notable Assessor/Verifier Explanation 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 Self/Joint-Assessment 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. | |
| No. | Virtual Requirement | Guidance | |
| 4.3.3.2 | 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 | <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 must 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. | |
| No. | FVV Requirements | Guidance | Recommendations/References/ Examples |
| 5.3.3.1 | Virtual walkthrough must be conducted on a sampling basis | <ul style="list-style-type: none"> 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. | <p>Reference: See Verifier Guidance for more details</p> <p>This column provides valuable recommendations, examples and useful links.</p> |

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As you can see in Figure 3, the numbers of the **Core** and **Virtual** requirements are not sequential since the Core requirement first appeared in Section 3 (SLCP Onsite Verification Requirements) and the Virtual requirement first appeared in Section 4 (SLCP Full Virtual Verification Requirements); therefore, both requirements maintain their original numbering. The table example shows what requirement is Core (common between onsite and virtual + onsite), what requirement is Virtual (common between virtual + onsite and full virtual) and what requirement is specific to full virtual. This is evident through the different colors for “Core” (**dark red**), “Virtual” (**green**) and FVV (**blue**). “Core”, “Virtual” and “FVV” requirements are all mandatory and must be met by the Verifier conducting an SLCP “Full Virtual Verification”.

Note: If the Verifier/ Verifier Body cannot adhere to the requirements listed in this Protocol (all requirements mandatory for the type of SLCP verification) the Verifier/ Verifier Body must submit an [Exception Request](#) to the Verification Oversight Organization.

[Return to the top.](#)

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SLCP Full Virtual Verification (Core + FVV Requirements)

5.2. Pre-FVV Verification

5.2.1. Confirming the Facility's Eligibility for Full Virtual Verification

| No. | FVV Requirements | Guidance |
|---------|--|---|
| 5.2.1.1 | The VB must confirm the facility's eligibility for Full Virtual Verification through receipt of the Full Virtual Self-Declaration Form that must be completed in full and signed by the facility | <ul style="list-style-type: none"> The Full Virtual Self-Declaration Form must be completed in full by the facility and signed electronically and then submitted to the VOO by the facility. The facility receives a copy of their completed and signed Full Virtual Self-Declaration Form. The facility must then submit the copy of their completed and signed Full Virtual Self-Declaration Form, together with the mandatory attachments/ evidence required in the form, to the VB during communication offline with the VB for scheduling and payment of verification. |
| 5.2.1.2 | The signed Full Virtual Self-Declaration Form provided by the facility must be accompanied by evidence of force majeure | <ul style="list-style-type: none"> A facility is eligible for SLCP Full Virtual Verification if: <ol style="list-style-type: none"> 1) The facility is currently experiencing a restriction in operations due to force majeure; and 2) The restriction in operations that the facility is experiencing due to force majeure has continued for the past 3 months or longer; and 3) The restriction in operations that the facility is experiencing due to force majeure is not expected to ease within the next 1 month or longer. Evidence for 1), 2) and 3) is required and must be provided by the facility along with a copy of their signed Self-Declaration Form confirming eligibility for FVV. It is the responsibility of the VB to verify the legitimacy and accuracy of the evidence provided. |
| 5.2.1.3 | The VB must ensure that the previous SLCP verification conducted for the facility was NOT full virtual. | <ul style="list-style-type: none"> Facilities are not permitted to undergo subsequent Full Virtual Verifications. The Verifier must ask the facility for access to the final verified assessment report data from the immediately preceding verification for confirmation. If the Verifier is not granted access to the most recent report data, they must contact the VOO. |

[Return to the top.](#)

5.2.2. Planning the Verification

| No. | Virtual Requirements | Guidance |
|---------|---|--|
| 4.2.1.3 | Execution of virtual verification activity must always be announced | <ul style="list-style-type: none"> 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. |
| 4.2.1.4 | Verifier and the facility must discuss the IT systems and other requirements needed to support the virtual verification activity | <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): <ul style="list-style-type: none"> Ping<100 ms Jitter<30 ms Speed should be at least 10Mbps |
| 4.2.1.5 | VB must discuss with the facility any information security and confidentiality issues that may arise from remote sharing of documents, records, and private information pertaining to workers | <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. |
| 4.2.1.6 | Virtual verification for documentation review must use one of the approved remote sharing mechanisms | <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. <p>Recommendation: 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> |

| | | | |
|-----------------|---|--|--|
| | | <ul style="list-style-type: none"> • 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 | |
| 4.2.1.7 | Virtual verification activity for opening and closing meetings, document review, walkthrough or interviews must be conducted using videoconference software | <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>Recommendation: 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> |
| 4.2.1.8 | Verifier must confirm relevant facility staff have the ability to share screens if record review should take place via screen sharing | <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 • This must be determined before the virtual verification activity begins | |
| 4.2.1.11 | 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. | |

| No. | FVV Requirements | Guidance |
|---------|---|--|
| 5.2.2.1 | Verifier must obtain a map of the facility to enable any virtual walkthrough activity and ensure all applicable facility areas are visited virtually. | <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) is covered during the virtual walkthrough. |
| 5.2.2.2 | All areas of the facility must have the Internet reach to be inspected virtually using a 4G data connection on a mobile phone or similar device. | <ul style="list-style-type: none"> If the Verifier is not able to view the entire area of the building attached to the business license as indicated in the facility profile the Full Virtual Verification cannot proceed. |
| 5.2.2.3 | Verifier must discuss timelines of completion of the Worker Engagement Question Set with the facility to ensure the VB/ Verifier receives the Summary Report prior to verification. | <ul style="list-style-type: none"> The facility must conduct the Worker Engagement Question Set facilitated by one of the SLCP approved Service Providers prior to verification. The Verifier needs to discuss this process with the facility to ensure both parties agree with the process and timelines. Once the Question Set is completed by the target sample of facility workers, the Question Set is automatically uploaded to the service provider, where the anonymous results are aggregated and compiled into an easy-to-read summary report. The report is then disseminated to the facility and the VB/ Verifier by the Service Provider. The Verifier must have the WE Tech Summary Report prior to commencing Full Virtual Verification |

[Return to the top.](#)

5.2.3. Assigning a Verifier

| No. | Core Requirements | Guidance | References |
|---------|--|--|---|
| 3.2.2.1 | The VB must ensure all rules for Verifier selection are enforced | <ul style="list-style-type: none"> 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. | |
| 3.2.2.3 | 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 | Reference: See Annex II for more information on how VBs and Verifiers are designated eligible for a specific facility. |

| No. | FVV Requirement | Guidance |
|---------|--|---|
| 5.2.3.1 | The VB must ensure that the assigned Verifier has completed the mandatory SLCP Full Virtual Verification Training to be eligible to conduct an SLCP Full Virtual Verification. | <ul style="list-style-type: none"> Mandatory Verifier Full Virtual Verification Training is accessible via SLCP Zendesk. Verifiers are not permitted to conduct SLCP Full Virtual Verification if they have not completed the mandatory training. |

[Return to the top.](#)

5.2.4. Assigning Person-days

| No. | Core Requirement | Guidance |
|---------|--|---|
| 3.2.3.2 | Trainees, assistants or other individuals who are not SLCP approved Verifiers cannot count toward the person-day requirement | <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. |
| No. | FVV Requirements | Guidance |
| 5.2.4.1 | Full Virtual Verification must take place within an 8-calendar day period. | <ul style="list-style-type: none"> • Full Virtual Verification must be consecutive to ensure consistency of data • Virtual person days should not exceed 8 calendar days. • If the Full Virtual Verification cannot take place within an 8-calendar day period, the VB must file an Exception Request. |
| 5.2.4.2 | The Verifier must maintain flexibility in the verification plan to allow for a possible extension of Full Virtual Verification time if virtual verification activity fails due to unexpected circumstances | <ul style="list-style-type: none"> • Although every effort should be made in the planning stage to avoid any unexpected issues, Full Virtual Verification activities may not go as planned and may need additional time. In this case, the Verifier must still meet the verification requirements and fulfill all required verification activities; therefore, Full Virtual Verification time will need to increase. • If the Full Virtual Verification timeframe has to be increased and exceeds 8 calendar days, the VB must complete an Exception Request. |

[Return to the top.](#)

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

| No. | FVV Requirement | Guidance |
|---------|--|---|
| 5.2.5.1 | Verifier must follow Table 9 below when conducting Full Virtual Verification | <ul style="list-style-type: none"> There is a maximum threshold for virtual review of wage/ hours records for each level of number of workers. |

Table 9: Determining minimum person-days, and sample of document review for Full Virtual Verification

| Number of Workers | Virtual Personnel Files | Virtual Wage & Hours Records | Minimum requirement |
|-------------------|-------------------------|------------------------------|---------------------|
| | | | Person-Days |
| 1 – 100 | 12-14^ | 10 x set of 3 = 30 | 1 |
| 101-200 | 20-24^ | 20 x set of 3 = 60 | 1.5 |
| 201 – 500 | 27-33^ | 27 x set of 3 = 81 | 2 |
| 501 – 1000 | 36-44^ | 40 x set of 3 = 120 | 3 |
| 1001+ | 52-64^ | 55 x set of 3 = 165 | 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.).

[Return to the top.](#)

5.2.6. Review of Self/Joint Assessment

| No. | Core Requirements | Guidance |
|---------|--|---|
| 3.2.5.3 | Verifier must ensure the self/joint-assessment contains at minimum 3 months of operation/3 months of self-assessed data | <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. |
| 3.2.5.4 | Verifier must review self/joint-assessment answers to ensure only English was used for Facility Self/Joint-Assessment Responses (unless the question explicitly asks for local language) | <ul style="list-style-type: none"> It is in the VB's/Verifier's interest to ensure all Facility Self/Joint-Assessment Responses are in English, because if the Facility Self/Joint-Assessment Responses are not in English, the Verifier will have to provide the English response in Assessor/Verifier Explanation for users to understand the Final Response. This means the Verifier is spending time translating the Facility Self/Joint-Assessment Responses. Accredited Host checks are required to detect non-English language and direct the facility to update the Facility Self/Joint-Assessment Response to English. However, technical failures can occur. If the self/joint-assessment contains non-English Facility Self/Joint-Assessment 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 Facility Self/Joint-Assessment Responses. There are only two questions that ask for local language facility responses, if applicable. |
| 3.2.5.5 | VB and Verifier must obtain relevant social and labor information related to specific conditions within the country and region of SLCP verifications | <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](#).

| No. | FVV Requirements | Guidance |
|---------|--|---|
| 5.2.6.1 | The VB must conduct a background check of the facility | <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 should be aware of potential bias that can develop with review of previous reports. |
| 5.2.6.2 | Verifiers must have access to, and reference final verified assessment report data from the immediately preceding verification for consistency of findings from virtual verification | <ul style="list-style-type: none"> • If there is no prior SLCP verification, the Verifier must be granted access to all (may be several) applicable audit reports from the past 18 months. If there are no applicable audit reports, the timeframe is extended to include the most recent social audit report. |
| 5.2.6.3 | Verifier must ensure that the facility has completed all of Step 2 in the self/ joint-assessment | <ul style="list-style-type: none"> • For Full Virtual Verification, the facility must complete, at minimum, all of Step 2 in the self/ joint-assessment process. • The set of data points that will be verified virtually cannot include the full set in Step 2, as some of the questions need an onsite visit for proper verification; however, requiring facilities to complete Step 2 in the self/ joint-assessment contributes to the report user having more insight into management systems. Conducting a self-assessment beyond just the full virtual verified data points will also help prepare the facility for the subsequent SLCP verification that must occur as a regular onsite verification. • Step 2 is the minimum requirement. If not, then the facility must open a ticket on the Active Accredited Host and go back to ASI to complete Step 2. |

| | | |
|----------------|--|---|
| 5.2.6.4 | Prior to starting FVV, the Verifier must check that all policies and procedures are attached to the applicable data point/ question in the self/joint-assessment in the Management Systems Section of the Tool | <ul style="list-style-type: none"> The facility is required to attach all policies and procedures to the applicable data points/ questions in the Step 2 Tool scope under Management Systems when completing the self/ joint-assessment. The Verifier must ensure that the facility has done this before starting the Full Virtual Verification. |
| 5.2.6.5 | The Verifier must study the self/joint-assessment completed by the facility to prepare for the Full Virtual Verification | <ul style="list-style-type: none"> 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). |

[Return to the top.](#)

5.2.7. Communication with Facility

| No. | Virtual Requirements | Guidance |
|----------------|--|--|
| 4.2.6.2 | The Verifier must attach the Verification Plan to the Validation Method question VD-VERI-1 via the online AH platform. | <ul style="list-style-type: none"> The Verifier need only do this for Validation Methods that include virtual verification activity: <ol style="list-style-type: none"> SLCP Virtual + Onsite Verification SLCP Full Virtual Verification |
| 4.2.6.4 | Verifiers are not permitted to record interviews | <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. |

| No. | FVV Requirements | Guidance | References |
|---------|---|--|---|
| 5.2.7.1 | Verifier/VB must first review the FVV Self-Declaration Form completed and signed by the facility to ensure the eligibility criteria for SLCP FVV have been met | <ul style="list-style-type: none"> If the facility has falsified any information provided in the Full Virtual Verification Self-Declaration Form and the Verifier proceeds with verification the verification will be invalidated. If the VB/ Verifier suspects that information has been falsified in the Full Virtual Verification Self-Declaration Form, the Verifier must contact the VOO immediately at slcp@sumerra.com and stop any further activity. | |
| 5.2.7.2 | 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 | <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 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) 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 if facility needs a local contact (telephone number and email) 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 verification duration. The verification duration can only be estimated 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>Reference: 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</p> <p>The <u>SLCP Code of Conduct</u> (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</p> |
| 5.2.7.3 | During the scheduling process, the VB must ensure that the operational processes and | <ul style="list-style-type: none"> For the facility to be eligible for Full Virtual Verification, the facility must be operating at a minimum of 50% workforce capacity and a minimum of 90% production processes capacity to be eligible for Full Virtual Verification. | |

| | | |
|---------|---|---|
| | workforce capacity on which the facility self-reported will be in operation during the verification | <ul style="list-style-type: none"> To the fullest extent possible, the situation in the facility must be representative of operations under normal circumstances so that the Verifier is able to fully understand working conditions on the day(s) scheduled for Full Virtual Verification. If production processes are operating at less than 90% capacity and/or workforce capacity is less than 50% then Full Virtual Verification cannot take place. 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. |
| 5.2.7.4 | Verifier must communicate to the facility the expectation of receiving a copy of the facility's WE Tech Summary Report from the service provider prior to commencing Full Virtual Verification | <ul style="list-style-type: none"> The facility must implement the Worker Engagement Question Set facilitated by one of the SLCP approved Service Providers prior to completing the self/joint-assessment. The Verifier must communicate with the facility regarding timelines to ensure the WE Tech Summary Report is provided to the VB/ Verifier by the service provider prior to verification. Once the Question Set is completed by the target sample of facility workers, the Question Set is automatically uploaded to the service provider, where the anonymous results are aggregated and compiled into an easy-to-read summary report. The report is then disseminated to the facility and the VB/ Verifier by the Service Provider. The Verifier must have the WE Tech Summary Report prior to commencing Full Virtual Verification. |
| 5.2.7.5 | Verifier/VB must send a Full Virtual Verification plan no less than five working days prior to the scheduled Full Virtual Verification with set dates and times and personnel included in the verification plan | <ul style="list-style-type: none"> The Full Virtual 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 the full virtual activity. See Verifier Guidance for sample of a verification plan. Also see the Helpdesk for <i>Full Virtual Verification Protocol for Facilities</i>, which provides Verification Protocol information about Full Virtual Verification in a more digestible format to facilities. 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 Full Virtual Verification to share/review documents or explain procedures through virtual walkthrough. |
| 5.2.7.6 | VBs/ Verifiers must receive written permission from the facility to record virtual sessions | <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). |

| | |
|---|--|
| | <ul style="list-style-type: none">• 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. |
| 5.2.7.7 IT systems must be confirmed 10 working days prior to Full Virtual Verification | <ul style="list-style-type: none">• Scheduling key IT requirements would have already been discussed to ensure Full Virtual Verification is feasible.• 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. All areas of the facility must be accessible for Full Virtual Verification to take place (unless facility makes note of a physical exclusion (see Box 6 Denied Access). |
| 5.2.7.8 Verifier must communicate to the facility that there needs to be a designated cameraperson for Full Virtual Verification | <ul style="list-style-type: none">• Verifier must ensure there is a staff person available throughout the verification who is responsible for using mobile phone or similar device to provide video access.• Ideally the facility will designate a single staff person to be the “cameraperson” (the individual in charge of operating the camera during Full Virtual Verification, especially during the virtual walkthrough). |

[Return to the top.](#)

5.3. Full Virtual Verification

5.3.1. General

| No. | Core Requirements | Guidance | Recommendations/ Examples/ References |
|---------|---|--|--|
| 3.3.1.4 | Any verification activity must comply with all applicable data privacy laws and regulations | <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). | |
| 3.3.1.5 | Verifiers must include all applicable types of “workers” in the verification | <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). | |

| No. | FVV Requirements | Guidance | References |
|---------|-------------------------------|--|--|
| 5.3.1.1 | Verifier must verify all data | <ul style="list-style-type: none"> The scope of a Full Virtual Verification will be limited to a subset of questions, automatically applied according to the backend once the Validation Method of Full Virtual Verification is selected. “All data” means all questions that are applicable to the facility according to the Full Virtual Verification subset of questions in the self/joint-assessment. <p>Even if the facility did not provide an answer to the applicable question, the Verifier has to verify the correct answer.</p> <p>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.</p> <div> <p>Note: The Verifier must still provide the Assessor/Verifier Response and supporting Assessor/Verifier Explanation to these unanswered questions.</p> </div> | <p>Reference: See Verifier Guidance for more details.</p> |

5.3.1.2 The timeframe of the Assessor/Verifier Explanation must be based on the same previous 12 months from the date that the self/joint-assessment is completed by the facility

- This timeframe is referred to as the assessment period.
- The **only exception to this is when filling in the Facility Profile**. When the Verifier begins Full Virtual Verification 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 verification, which may require an update and selection of “Updated during Verification”.
- **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)).**

Note: Although the date of verification does not technically exist within the 12-month scope of the self-assessment, any virtual walkthrough observations must be used to verify Facility Self/Joint-Assessment 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 virtual walkthrough there are boxes and other materials that have been placed in front of a fire exit door. The Verifier must then mark the Facility Self/Joint-Assessment Response as Inaccurate - Incorrect and provide details in Assessor/Verifier Explanation. Any observation the Verifier makes during the virtual walkthrough that contradicts a Facility Self/Joint-Assessment Response suggests that it is not an isolated practice and must be included as part of the 12-month assessment.

5.3.1.3 Each verification must cover the area as defined by the facility in the Facility Profile of the self/joint-assessment and all operations included therein

- **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.

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.
- **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 (FP-BAS-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 Facility Self/Joint-Assessment Response. The facility must treat the multiple business licenses as one facility, meaning the number of workers shall be all

Reference: Please see the [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.

Reference: For additional guidance and clear requirements on assessments related to a facility’s business license in all countries where SLCP is

business licenses combined.

- **Physical scope: workers' housing/ dormitories:** Only housing used by workers (does not have to be exclusive to workers) is within the 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.
- **Building/construction, structural safety and fire permits and certificates** must cover all structures and any additions made to the facility, including any canteen and childcare facilities, as applicable. If any documents are not available onsite during virtual document review or do not cover all structures, the Verifier must select 'Inaccurate - Incorrect' and provide all relevant details in the 'Assessor/Verifier Explanation' field (e.g., *HS-BUI-1: Are building/construction, structural safety and fire permits and certificates in line with legal requirements?*). If there are no applicable legal requirements, answer "No applicable legal requirements".

operational, see
<https://slcp.zendesk.com/hc/en-us/articles/360012552213-What-are-the-rules-around-creating-facility-profiles-on-the-Gateway->

[Return to the top.](#)

5.3.2. Opening Meeting

| No. | Core Requirement | Guidance |
|---------|--|---|
| 3.3.2.2 | Authorization to take pictures must be requested | <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/ screenshot sensitive (i.e., proprietary) products, materials or processes. If photo/ screenshot 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/ screenshots and yet agree to take photos/screenshots themselves on behalf of the Verifier, this must be noted in the report along with any incidences where the Verifier did not receive pictures/ screenshots they requested. |

| No. | Virtual Requirement | Guidance | Recommendation |
|---------|--|--|---|
| 4.3.2.2 | Virtual opening meeting must be conducted using videoconference software | <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) Type of videoconferencing software used must be agreed upon by VB and facility | The VB should use videoconferencing software they know 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 Full Virtual Verification. |

| No. | FVV Requirement | Guidance |
|---------|--|---|
| 5.3.2.1 | Full Virtual Verification must start with an opening meeting | <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. 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 and accuracy of facility data. |

[Return to the top.](#)

5.3.3. Walkthrough

| No. | Core Requirement | Guidance |
|---------|--|--|
| 3.3.3.2 | Verifier must inform the facility about any inaccuracies during the verification | <ul style="list-style-type: none"> • Throughout the verification, the Verifier informs facility management about any inaccuracies, notable Assessor/Verifier Explanation 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 Self/Joint-Assessment 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. |

| No. | Virtual Requirement | Guidance |
|---------|--|--|
| 4.3.3.2 | 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 | <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 must 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 (while following requirements for facility permission, privacy and confidentiality and the use of videoconference software) |

| No. | FVV Requirement | Guidance |
|-----|-----------------|----------|
|-----|-----------------|----------|

5.3.3.1 Verifier must take time to first look at the ‘big picture’ before focusing in on the detail

Examples of items to look for to understand the ‘big picture’:

1. Cameraperson hesitant/ slow to show specific areas of workplace
2. People being ushered out of the workplace (e.g., children, or those without contracts)
3. People being moved within the workplace (e.g., young people doing hazardous work or pregnant women working with chemicals)
4. Things being hastily hidden (chemicals in the general work area), or doors being quickly locked or unlocked
5. PPE being hastily put on
6. 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).

Note: Although this technique is challenging during virtual walkthrough, it is critical that the Verifier pay attention to what is happening beyond simply the main focus of the camera.

[Return to the top.](#)

5.3.4. Management Interviews

| No. | Virtual Requirements: | Guidance | Recommendations |
|----------------|--|---|---|
| 4.3.4.2 | Management does not need to be present at the facility for virtual management interviews to take place | <ul style="list-style-type: none"> The interviews can happen at a place that best suits the interviewee. | |
| 4.3.4.3 | Virtual verification activity for management interviews must be conducted using videoconference software | <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 | <p>Recommendation: 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</p> |

- Recommended videoconference software feature
 - 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

understand how to use the software PRIOR to the virtual verification activity.

| No. | FVV Requirements | Guidance |
|---------|---|---|
| 5.3.4.1 | Verifiers must conduct management interviews | <ul style="list-style-type: none"> • 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. |
| 5.3.4.2 | Full Virtual management interviews must not be recorded | <ul style="list-style-type: none"> • Management interviews must not be recorded, even if facility provides express permission to do so. • Communication to the facility in advance of the Full Virtual Verification will include explaining that Virtual interview activity will not be recorded. |

[Return to the top.](#)

5.3.5. Document Review

| No. | General: Virtual Requirement | Guidance |
|---------|--|--|
| 4.3.5.3 | Verifier is not permitted to record virtual document review and must ask for permission to take screenshots during opening meeting or pre-verification meeting | <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). Verifier must ask the facility for permission to take pictures during the opening meeting/ pre-verification meeting prior to starting the virtual activity. |
| No. | General: FVV Requirement | Guidance |
| 5.3.5.1 | Verifiers must request proof of presence of specific policies and procedures onsite during virtual tour | <ul style="list-style-type: none"> Specific documents requested will not be made known to facility prior to date of Full Virtual Verification and must be available upon request <div> <p>IMPORTANT: The Facility Profile Gateway data will be updated with the final verified data. Therefore, it is very important that the Verifier checks and verifies the facility data, especially the OAR/OS ID and business license number because users will reference this data through the Gateway public facility data to identify facilities in their supply chain or program.</p> </div> |
| 5.3.5.2 | Verifiers must review documents to understand the facility's procedures and to verify specific claims about how the workforce is managed | <ul style="list-style-type: none"> The data collected from management interviews and the WE Tech Summary Report must be checked against all other documentation to ensure that all information matches. Personnel files will be reviewed to verify facts about contracts, age and identity proof, training, job performance, disciplinary action and resignation/ termination. |

| No. | Wage and Hours records: Core Requirements | Guidance | Reference |
|---------|---|---|---|
| 3.3.5.2 | 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 | <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> <ul style="list-style-type: none"> The Verifier may extend the sample within the 12-month assessment period if s/he think it necessary to substantiate the verification. 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). | <p>Reference: For examples of what do to when reviewing wages and hours see Verifier Guidance.</p> |
| 3.3.5.3 | When reviewing units for rate of pay, Verifier must include breakdown of number of workers receiving each type of unit for rate of pay if facility has more than one type of unit for rate of pay | <ul style="list-style-type: none"> 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 | <p>Reference: For examples of how to record more than one unit of pay in the facility see Verifier Guidance.</p> |
| No. | Wage and Hours records: Virtual Requirement | Guidance | |
| 4.3.5.4 | 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 | <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. | |

[Return to the top.](#)

5.3.6. WE Tech

Deployment of the WE Question Set for facility workers is a mandatory element of SLCP Full Virtual Verification. The facility and the Verifier Body/ Verifier(s) receive the We Tech Summary Report from the WE Tech Service Provider at the same time. **If the WE Tech Service Provider only has the VB admin contact email, it is the responsibility of the VB admin to forward the report to the Verifier(s).**

The WE Tech Summary Report will be attached by the Verifier to the final verified assessment for question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section of the report. This means that any user with whom the facility shares the final verified assessment report will receive the WE Tech Summary Report and the Verifier comments.

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

The Verifier must NOT judge or evaluate (e.g., completeness, appropriateness) the information or documentation shared by the facility in relation to use of WE Question Set data and follow up on any post WE Question Set planning/ action. Mandatory Verifier requirements for WE Tech are:

| No. | WE Tech Preparation: FVV Requirement | Guidance |
|---------|---|---|
| 5.3.6.1 | Verifiers must undergo mandatory SLCP Verifier training prior to conducting an SLCP Full Virtual Verification | <ul style="list-style-type: none">– Training on SLCP Full Virtual Verification is mandatory.– The VOO reserves the right to invalidate the verification if the Verifier conducting a Full Virtual Verification has not completed the Full Virtual Verification Training for Verifiers. |

| No. | WE Tech Summary Report Review: FVV Requirements | Guidance |
|---------|--|--|
| 5.3.6.2 | Verifiers must review the WE Tech Summary Report to identify any areas in need of more attention during verification | <ul style="list-style-type: none">• This may mean identification of:<ul style="list-style-type: none">– Tool questions to review with facility management to see how they incorporated the Question Set results in the self/joint-assessment answers– Tool questions to verify in more detail (e.g., spend more time on the issue during management interviews, documentation review, or walkthrough) to see if issues can be triangulated, or non-compliance against law or international standards can be identified. |

| 5.3.6.3 | Verifiers must review the WE Tech Summary Report to help determine the accuracy of facility responses | <ul style="list-style-type: none"> Verifiers must use the WE Tech Summary Report as a supporting document to verify the accuracy of the facility's response. Depending on the results from the WE Tech Summary Report, the Verifier may want to dig deeper into management interviews, documentation review or walkthrough to determine accuracy of facility responses |
|---------|---|---|
| 5.3.6.4 | Verifiers need to verify that the facility used the WE Tech Summary Report to complete the Self/joint-Assessment | <ul style="list-style-type: none"> The facility is required to reference the WE Tech Summary Report and provide details when using it as a supporting document. The Verifier must assess how the facility used the WE Tech Summary results to inform the self/joint-assessment (e.g., did the WE Tech Summary Report change the initial Facility Self/Joint-Assessment Response). The Verifier must document the facility answers to the Verifier question in the Assessor/Verifier Explanation field related to that Tool question. Attach any applicable documents the facility provides to that specific Tool question on the Accredited Host platform. If the documentation is general in nature and applies to multiple Tool questions, attach the document in the Verification/Assessment Details section of the report. If there are no references to the WE Tech Summary Report, the Verifier needs to discuss the reasons why with the facility and record the information in Verification/Assessment Details. |
| No. | WE Tech Activities: FVV Requirements | Guidance |
| 5.3.6.5 | The Verifier must discuss with the facility which processes the facility used to execute the WE Question Set to determine if implementation followed correct procedure (see Guidance for details) | <ul style="list-style-type: none"> The Verifier must ask the facility how the WE Question Set was conducted: <ul style="list-style-type: none"> Onsite/ offsite With or without worker committee/ worker representative/ trade union representative Depending on the processes used, the Verifier must check and document: <ul style="list-style-type: none"> Impact (if any) on workers' pay if WE Question Set was conducted onsite Compensation for time taken to complete the WE Question Set if workers are paid by piece rate (compensation should be based on average hourly wage) The Verifier must verify and document involvement of worker committee/ worker representative/ trade union representative in the WE Question Set deployment under question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section. |
| 5.3.6.6 | The Verifier must ask about and | <ul style="list-style-type: none"> If a question from the WE Question Set relates to a specific Tool question, the Verifier shall ask if the facility has done |

| | |
|---|--|
| <p>document any already completed actions by the facility in response to questions related to the WE Tech Summary Report</p> | <p>anything related to that question as a follow-up to the WE Tech Summary Report (e.g., put the issue on the agenda for the next workers meeting; ask the worker committee to investigate further, etc.).</p> <ul style="list-style-type: none"> • The Verifier must then document the facility answer in the Assessor/Verifier Explanation field related to that Tool question. The Verifier must attach any applicable documents the facility provides to that specific Tool question on the Accredited Host platform. • If the documentation is general in nature and applies to multiple Tool questions, attach the document to question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section |
| <p>5.3.6.7 The Verifier must ask and document any facility post-WE Tech Summary Report action planning</p> | <ul style="list-style-type: none"> • Determine through documentation review and/or management interviews how the facility intends to use the WE Tech Summary Report for further actions to improve working conditions and worker well-being. <ul style="list-style-type: none"> – Does the facility have any documentation related to e.g., further investigation, prioritization of issues, root cause analysis, improvement plan? • The Verifier must then document the facility answers under question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section. • The Verifier must attach any applicable documents to question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section. |
| <p>5.3.6.8 The Verifier must attach the PDF of the WE Tech Summary Report to question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section of the report.</p> | <ul style="list-style-type: none"> • The Verifier must attach the WE Tech Summary Report to question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section of the report when uploading to the AH platform. • If the facility requests that the Verifier NOT attach the WE Tech Summary Report to the final verified assessment report, the Verifier must remind the facility that it is a mandatory element of SLCP Full Virtual Verification, and that the facility agreed to the WE Question Set deployment when signing the Full Virtual Verification Self-Declaration Form. • There will be no exceptions to this requirement. |
| <p>5.3.6.9 The Verifier must only document factual information related to the facility's use of the WE Question Set</p> | <ul style="list-style-type: none"> • The Verifier must NOT judge or evaluate (e.g., completeness, appropriateness) the information or documentation shared by the facility in relation to use of the WE Tech Summary Report and follow up actions/plans resulting from the WE Tech Summary Report. • It is out of scope and not the Verifier's role to help the facility develop a corrective action plan. |

[Return to the top.](#)

5.3.7. Document and Photo Attachments

| No. | Core Requirement | Guidance | Examples |
|---------|---|---|---|
| 3.3.6.1 | Verifiers must include specific photographic/ screenshot evidence and/or documentation attached to questions of the Tool, selecting the question that best fits | <ul style="list-style-type: none"> At minimum, Verifiers must include photographic/ screenshot 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 - Incorrect” 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 “Assessor/Verifier Selection” Photographs/ screenshots 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/ screenshots/ documentation is only possible through the online Accredited Host platform. <ul style="list-style-type: none"> Verifiers can attach a file at question level and thus select the most applicable question that | For examples of instances for document/photo/ screenshot attachments see Verifier Guidance. |

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/Assessment 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/ screenshots 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.

[Return to the top.](#)

5.3.8. Pre-closing Meeting

| No. | Core Requirement | Guidance | Reference |
|---------|--|---|---|
| 3.3.7.1 | Prior to the closing meeting, the Verifier must take the time to complete all “Inaccurate - Incorrect”, “Non-Compliance” (for Verification Summary) and “Updated during Verification” items to prepare for the closing meeting | <ul style="list-style-type: none"> • If the Verifier has not already completed all “Inaccurate - Incorrect”, “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 and may have to skip some entries in the Verification Summary or just provide highlights to the facility. | Reference: More information about how to complete the Verification Summary is in the Verifier Guidance . |

[Return to the top.](#)

5.3.9. Closing Meeting

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.3.8.2 | Verifier must not provide training or help the facility to identify root causes of the issues found | <ul style="list-style-type: none"> It is out of scope and not the Verifier's role to train management, to help the facility identify 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. |
| 3.3.8.3 | 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 | <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 reporting. For example, SLCP does not prohibit the VB from sending zero tolerance/ critical issue reports immediately after 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 |
| 3.3.8.4 | 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 | <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 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 Requirements 3.4.1.1. If concerns relate to Verifier following Verification Protocol and/or Verifier conduct, then the facility can raise a Dispute, see 2.11.8. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>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.</p> </div> |

| No. | FVV Requirement | Guidance | Reference |
|---------|---|--|--|
| 5.3.9.1 | The Full Virtual Verification must end with a closing meeting | <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. 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. | Reference: See Verifier Guidance for closing meeting agenda recommendations |

[Return to the top.](#)

5.4. Post-FVV Verification

5.4.1. Addressing Facility Concerns

| No. | Core Requirement | Guidance |
|---------|--|--|
| 3.4.1.1 | Verifier must address facility concerns brought up during the verification/ closing meeting within two days (48 hours) from end of verification and address any applicable requests for edits by the facility within the 14-calendar day review period in VRC. | <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 2.11.8. • The Verifier may have to review further documentation or conduct remote interviews due to exceptional circumstances during 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 must offer the facility the option to include their concerns in the applicable Assessor/Verifier Explanation field along with an explanation from the Verifier why the Verifier did not make edits to the final report. <div> <p>Note: The 48 hours is not for the facility to change the verification outcome by writing-up a document after verification, nor is the 48 hours for the facility to make corrections to proven/ confirmed verification outcomes.</p> <p>Important: Any legal non-compliance or inaccuracy determined at time of verification needs to be noted as a non-compliance and/or inaccuracy for the verification. If the facility makes a correction before the end of the verification, the Verifier can make a note in Assessor/Verifier Explanation 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.</p> </div> |

[Return to the top.](#)

5.4.2. Verified Assessment Report Revision

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.4.2.1 | Any changes the Verifier makes to the report after completion/ during the facility review phase must be agreed upon by the facility | <ul style="list-style-type: none"> 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. |
| 3.4.2.2 | 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. |
| 3.4.2.3 | 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 | <ul style="list-style-type: none"> 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”. |

[Return to the top.](#)

5.4.3. Report Writing: Assessor/Verifier Selections and Entries

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.4.3.1 | Assessor/Verifier Selection must be completed correctly following the specific rules explained in the column “Guidance” | <p>There are six (6) Assessor/Verifier Selection options for the Verifier to manually select and three (3) automated verification options that are automatically made for the Verifier by the Tool.</p> <p>The rules on what Assessor/Verifier Selection to choose are as follows:</p> <ol style="list-style-type: none"> 5. Accurate: Information provided by the facility is 100% correct and supported by data. 6. 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. 7. Inaccurate – Incorrect: Information provided by the facility has one or more errors because facility made a mistake or did not share accurate/ honest data (e.g., business license is actually not valid anymore). This Assessor/Verifier Selection is chosen if: <ul style="list-style-type: none"> – 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) – If there is a lack of documentation that does not permit accurate verification of specific questions 4. Inaccurate – Misunderstanding: To be selected by the Verifier when the facility has misunderstood the question (e.g., wrong understanding of “worker” and including supervisors in the calculations of total number of workers) and provided an Inaccurate Facility Self/Joint-Assessment Response. <ul style="list-style-type: none"> – SLCP provides the Verifier with all definitions and explanations in “More Info”. <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Note: 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 Assessor/Verifier Explanation field.</p> <p>The Assessor/Verifier Response option is not applicable for Follow-up Questions where the facility provides a description. Therefore, the Assessor/Verifier Response field is whited out. Since all Follow-up Questions have free</p> </div> |

narrative answers; the Assessor/Verifier Explanation field is sufficient to offer an opportunity for the Verifier to provide the correct information and additional details on the facility's circumstances, if necessary.

5. **Facility did not reply during SA/JA:** This means that the facility did not provide a response at all.

This feature is automated. The Verifier does not need 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 (available for onsite verification only), the AH completes the "Facility did not reply during SA/JA" Assessor/Verifier Selection before the Verifier opens the offline Tool.

Note: In the offline Tool (available for onsite verification only) dark grey fields indicate that the facility has not provided a response. When the facility provides a response, the color changes to light grey. For dark grey fields not answered by the facility, **the Verifier must still enter the Assessor/Verifier Response and provide Assessor/Verifier Explanation to support the Assessor/Verifier Response.**

6. **Not visible to facility during SA/JA:** The Assessor/Verifier Response opens up conditional questions not previously visible for the facility to answer during self/joint-assessment, and therefore the Facility Self/Joint-Assessment Response is blank. See example in Example column.

This feature is automated. The Verifier does not need to select "Not visible to facility during SA/JA" as it is automatically done for the Verifier in the online and offline (available for onsite verification only) version of the Tool.

Note: Automated Assessor/Verifier Selections may be overridden by the Verifier, i.e., the Verifier can manually change an automated Assessor/Verifier 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.

7. **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 Assessor/Verifier Selection is chosen by the Verifier, then the Assessor/Verifier Response column remains blank and must not be completed because the question is not applicable.
8. **No longer applicable due to verification:** The Assessor/Verifier Response makes the conditional questions that were answered (or not answered) by the facility in the self/joint-assessment no longer applicable.

This feature is automated. The Verifier no longer needs to select “No longer applicable due to verification” as it is automatically done for the Verifier in the offline and online version of the Tool.

The Verifier does not need to provide an explanation in Assessor/Verifier Explanation. Once this option has been automatically selected the Assessor/Verifier Response column remains blank because the question is not applicable. For the user of the verified data the Assessor/Verifier Selection alone 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 Assessor/Verifier Response AND also if the Assessor/Verifier Selection of the parent question is “Not applicable due to special facility circumstances.”

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

See the [Verifier Guidance](#) for examples of when to use different responses and for more details.

3.4.3.2 Depending on the Assessor/Verifier Selection, other verification fields must be completed/cannot be left blank

- See Table 10 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).

3.4.3.3 Assessor/Verifier Explanation must be supported by photos/ attachments where feasible

- See last column “Photo/ File upload to AH” in Table 10 for when attachments are required
- Support material is required (if feasible) where the Assessor/Verifier Selection is “Inaccurate - Incorrect” and if there is a “Non-Compliance”

3.4.3.4 Verifier must adhere to applicable data privacy regulations

- 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
- If facility does not permit photographs due to confidentiality, then please note in report under the Verification/Assessment 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.

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

[Return to the top.](#)

Table 10: Requirements for Completion of Verification Fields

| Assessor/Verifier Selection | Assessor/Verifier Response | Assessor/Verifier Explanation | 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” ⁴ | 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 Assessor/Verifier Explanation, then must upload |
| Inaccurate - Incorrect selected | NEVER BLANK Must select or fill in | NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Incorrect and 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 | MUST UPLOAD if proof/ documentation available |

⁴ 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 section 2.9.1 [Identifying and citing when facility is not in line with legal requirements.](#)

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|---|---|--|---------------|--|---|
| Inaccurate - Misunderstanding selected | NEVER BLANK Must select or fill in | NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Misunderstanding and share facility details so users of the verified data can make corrective action plans as necessary. Information helps SLCP to continuously improve. | As applicable | If Non-Compliance selected, must fill in narrative | MUST UPLOAD if proof/documentation available |
| Facility did not reply during SA/JA automatic selection | 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 automatic selection | 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 |

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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 | | | would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload |
| Not applicable due to special facility circumstances selected | | <p>NEVER BLANK</p> <p>Must fill in narrative to explain why there is a special facility circumstance that results in the Assessor/Verifier Response not being applicable</p> | | | If proof/ documentation available to emphasize a point shared in Assessor/Verifier Explanation, then must upload |
| No longer applicable due to verification automatic selection | | Verifier can choose to leave comments | | | |
| Verification not Required | | Verifier can choose to leave comments | | | |

[Return to the top.](#)

5.4.4. Report Writing: Assessor/Verifier Explanation

In addition to the correct Assessor/Verifier Selection and Assessor/Verifier Response, **Assessor/Verifier Explanation is essential** for users to understand facility circumstances and make decisions on compliance levels, corrective action and remediation. Users use Assessor/Verifier Explanation to inform compliance, grading, certification and/or remediation. **For the table of requirements below make sure to read the [Verifier Guidance](#) for important examples!**

| No. | Core Requirements | Guidance |
|---------|---|---|
| 3.4.4.1 | Verifiers must provide details in “Assessor/Verifier Explanation” that clearly explain the reason for the specific Assessor/Verifier Selection and provide users of SLCP data with necessary information to inform post SLCP steps (including grading, certification and corrective action plans) | <ul style="list-style-type: none"> • If Assessor/Verifier Selection is “Accurate”: there may be circumstances which make the situation unique or irregular. In these cases, the Verifier must provide additional information in Assessor/Verifier Explanation (e.g., India’s Variance Dearness Allowance (VDA)). See detailed examples and situations in Verifier Guidance. • If Assessor/Verifier Selection is “Inaccurate - Incorrect”: the user of the data needs to understand what the accurate situation is (Assessor/Verifier Response) and why the situation was not captured accurately by the facility in the self/joint-assessment (Assessor/Verifier Explanation). <ul style="list-style-type: none"> – Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation 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 Assessor/Verifier Selection is “Inaccurate - Misunderstanding”: the Verifier must provide the Assessor/Verifier Response along with the Assessor/Verifier Explanation that clearly states the reasons why the facility misunderstood the question. Detailed and clear Assessor/Verifier Explanation is also critical to inform continuous improvement of SLCP processes. <ul style="list-style-type: none"> – Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation 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 Assessor/Verifier Selection is “Updated during Verification”:** If Facility Profile responses need to be updated the Verifier must provide details for the update in Assessor/Verifier Explanation. Reasons provided by the Verifier can be a simple explanation like something changed between the date of self-assessment and verification. **See Example “Updated during verification” in [Verifier Guidance](#).**
- 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 Assessor/Verifier Explanation must explain that the facility addresses the issue regardless of the absence of legal requirements.
- If the Final Response shows a result that according to Verifier’s social auditing experience would normally result in a code of conduct or standard non-compliance (no matter if the Assessor/Verifier Selection is Accurate or Inaccurate), Assessor/Verifier Explanation must include details so that the user of the report can better inform remediation efforts. **See [Verifier Guidance](#) for example.**
- **If Facility Self/Joint-Assessment 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.
- **If the Assessor/Verifier Selection is “Facility did not reply during SA/JA”,** the Assessor/Verifier Explanation must be a short statement of what information was reviewed to support the Assessor/Verifier 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:” **See [Verifier Guidance](#) for example.**

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.

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

- The 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”
- **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/Assessment 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:**
 - 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:
 - Raising a Non-Compliance and filling in the Legal Reference for any applicable Assessor/Verifier Selection, including Inaccurate – Incorrect, Inaccurate – Misunderstanding, Accurate, Not visible to facility during SA/JA and other selections.

See also information about the [Law Overlay](#).

| | |
|--|---|
| <p>3.4.4.3 Temporary regulatory circumstances must also be explained in Assessor/Verifier Explanation, as applicable, and in the Verification/ Assessment 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 Assessor/Verifier Selection and Final Response, if there was a temporary regulatory circumstance this must be mentioned, as applicable, in the Assessor/Verifier Explanation and the Verification/Assessment Details section of the report.</p> |
| <p>3.4.4.4 If the Facility Self/Joint-Assessment Response 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"> – For example: “Are toilets clean, and sanitized on a regular basis?” If the Facility Self/Joint-Assessment 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>3.4.4.5 If the facility misunderstood the question, the Verifier must select Inaccurate – Misunderstanding as the Assessor/ Verifier Selection field</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 on the question. • A “Misunderstanding” means that the facility did not understand the question properly. • A “Misunderstanding” <u>does not mean</u> the facility misjudged the facility circumstances because they were not aware of the real situation. <ul style="list-style-type: none"> – A situation of Misunderstanding: 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 Assessor/Verifier Response and “Misunderstanding” in the Assessor/Verifier Explanation field. Then the Verifier explains the misunderstanding of the facility in the Assessor/Verifier Explanation field. – Not a situation of Misunderstanding: 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. |

| | | | |
|-----------------|--|--|---|
| 3.4.4.6 | The Verifier must provide enough details for the reader to identify if the situation is “isolated” or “systemic” | <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. • Systemic: Issues that are purposeful, intentional, and methodical in nature that occur regularly and/or impact a significant number of workers. | Reference: See Verifier Guidance for examples of isolated and systemic issues. |
| 3.4.4.7 | Assessor/Verifier Explanation clearly links to the question/ data point | <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 Assessor/Verifier Explanation fields is poor form. | |
| 3.4.4.8 | Assessor/Verifier Explanation is factual and without judgment | <ul style="list-style-type: none"> • Assessor/Verifier Explanation 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 Assessor/Verifier Explanation, 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. | |
| 3.4.4.9 | Verifier must enter all Assessor/Verifier Explanation in English | <ul style="list-style-type: none"> • The SLCP final verified assessment report is 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 translate the facility’s response into English in the Assessor/ Verifier Explanation field. • 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. | Reference: See Verifier Guidance for example. |
| 3.4.4.10 | Assessor/Verifier Explanation uses correct spelling and | <ul style="list-style-type: none"> • It is very important that the information is entered using correct spelling and grammar so the user can easily understand the verified assessment report. | |

grammar

3.4.4.11 Assessor/Verifier Explanation
statements must be based on the
12-month assessment period*

- The assessment period for SLCP only includes the 12 months prior to the submission date of the self/joint-assessment. Assessor/Verifier Explanation statements are to be based on this assessment period

***The only exception is in the Facility Profile section, where the Verifier must include the most up-to-date information which may require the Assessor/Verifier Selection “Updated during Verification”**

Reference: See [Verifier Guidance](#) for example.

[Return to the top.](#)

5.4.5. Report Writing: Verification/Assessment Details

| No. | Core Requirements | Guidance | Example |
|---------|--|---|---|
| 3.4.5.1 | All fields in the Verification/Assessment Details section must be completed | <ul style="list-style-type: none"> • If the Verifier does not have any information to enter, the Verifier must still complete the field with N/A. • Verifier should pay attention to the More Info links/fields to understand what to respond to in the Verification/Assessment Details section. • The question in Verification/Assessment Details about Verification Duration must be filled in with the total number of person-days used for verification (which may also include virtual verification). | <p>Example–Person-days:</p> <ul style="list-style-type: none"> – 2 Verifiers for 2 calendar days = 4 person-days. – 1 Verifier for 1 calendar day virtual and 2 Verifiers for 1 calendar day onsite = 3 person-days. |
| 3.4.5.2 | The Verifier must enter Verification/Assessment Observations about the facility if the facility engages in behavior that negatively impacts process integrity. | <ul style="list-style-type: none"> • In Verification/Assessment Details section of the Tool, v1.5 of the Tool now asks the question: <i>VD-VERI-19: 1.1 Did the facility engage in behavior that impacts process integrity (e.g., incomplete, inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?</i> • Facilities should report actual conditions and be transparent about any non-compliance with applicable legal requirements or facility practices like double bookkeeping. • Entries in this section of the report will be visible to the facility for review. The Verifier must report only confirmed findings, as stipulated in the CAF Terms of Use: “Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users.” The SLCP Signatory Charter also calls for signatories to “respect the principle of true data in SLCP verified assessments by recording and accepting honest data, and by prioritizing remediation over punishment”. • If the Verifier has any doubts about the information they are reporting in “Verification/ Assessment Observations” then the Verifier should use the confidential reporting form. See below: 5.4.10. Reporting issues outside of the Final Verified Assessment Report. | |

[Return to the top.](#)

5.4.6. VB Quality Check

| No. | Core Requirement | Guidance | References/ Recommendations |
|---------|---|---|--|
| 3.4.6.1 | 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 | <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. On calendar day 5 after the assessment status changes from “Verification in Progress” (VRP) (via “Verification Quality Check” (VRQ)) 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. 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>Reference: 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).</p> <p>Reference: Go to our Helpdesk to see which data quality checks SLCP is currently running.</p> <p>Recommendation: 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.</p> <p>Although not a requirement, SLCP highly recommends the Verifier review the VRQ check failure email and revise the report as applicable.</p> |

Note: 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 prior to and after finalization. Any failures/ mistakes still in place will negatively affect the Verifier and VB score.

5.4.7. VB Document Retention

| No. | Core Requirement | Guidance |
|---------|---|--|
| 3.4.7.1 | 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>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>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.</p> |

5.4.8. VRF Edits

| No. | Core Requirement | Guidance | References |
|---------|--|--|---|
| 3.4.8.1 | 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. | <ul style="list-style-type: none"> 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. 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 need to work with the VOO to determine the edits that need to be made. | Reference: see the SLCP QA Manual for further details. |

[Return to the top.](#)

5.4.9. Ethics

| No. | Core Requirement | Guidance |
|---------|--|--|
| 3.4.9.1 | Accepting gifts of any value from facility managers, workers or others related to the verification is inappropriate and not permitted. | <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 • The Verifier must advise their VB and contact the VOO immediately to report the incident and to 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). |
| 3.4.9.2 | Verifiers must never allow management to take them out for lunch during a verification nor accept payment for lunch | <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. |
| 3.4.9.3 | Verifiers/VBs must adhere to Annex I and Annex VI | <ul style="list-style-type: none"> • See Annex I Professional Conduct and Annex VI SLCP Code of Conduct |

[Return to the top.](#)

5.4.10. Reporting issues outside Final Verified Assessment Report

| No. | Core Requirements | Guidance |
|----------|--|--|
| 3.4.10.1 | 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 | <ul style="list-style-type: none"> • 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. • 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. • 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: <ul style="list-style-type: none"> – 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) <p>See Verifier Guidance for scenarios and examples.</p> |

3.4.10.2

VBs must review information on the Gateway related to sensitive/ confidential (if applicable) and share this information with the Verifier before conducting any new verification, as the previous verified assessment report is not always shared.

[Return to the top.](#)

- Facility profile note is only visible to the VBs and admins. The facility does not have visibility to the notes.
- The information shared by the VOO related to the sensitive/confidential report will be clearly displayed on the Gateway.

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Annex

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

Personal Safety

There may be cases 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.

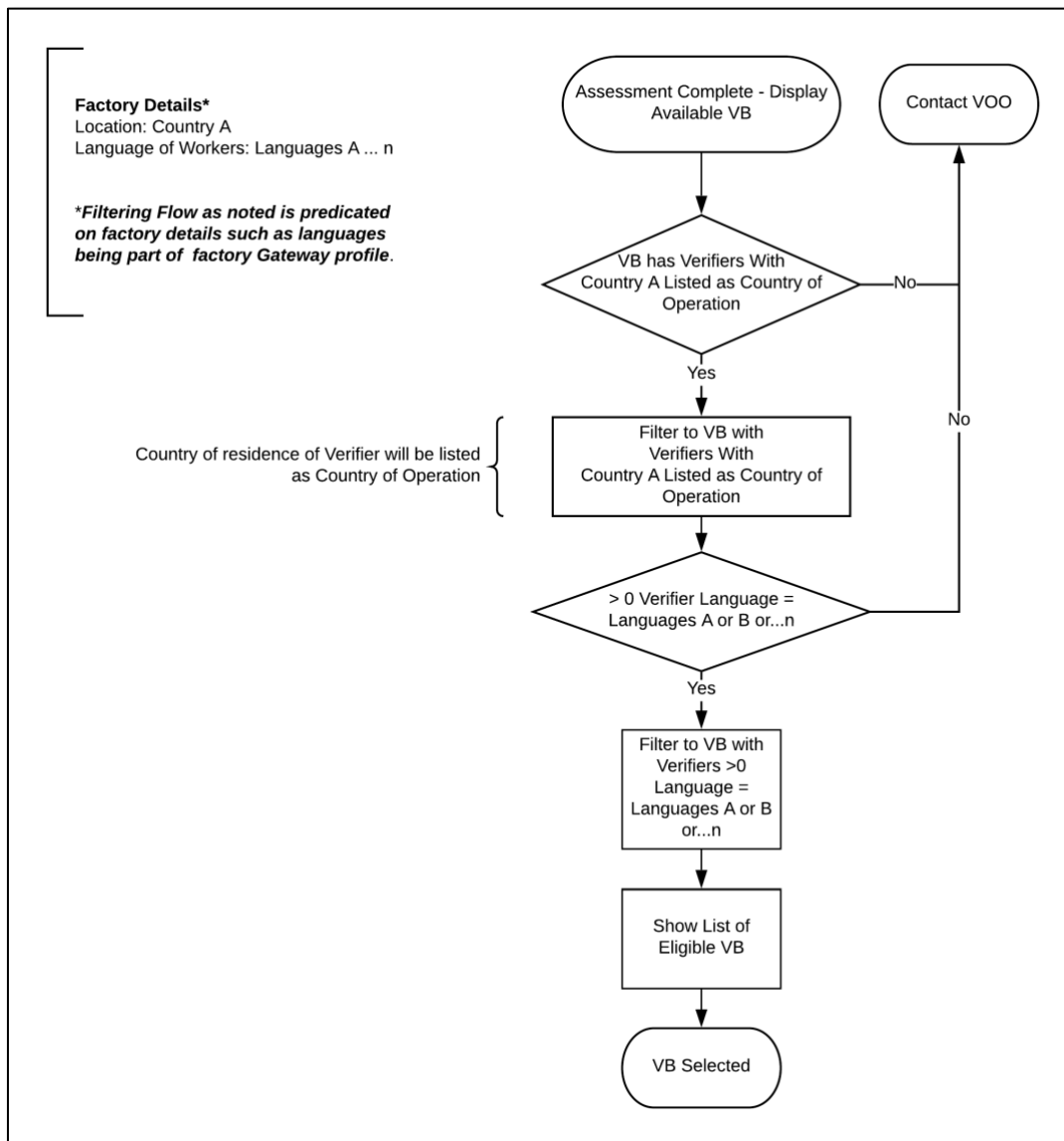
VBs want to ensure that Verifiers:

- 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 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.

[Return to the top.](#)

Annex II Filtering of Verifier Body and Verifier

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.



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.

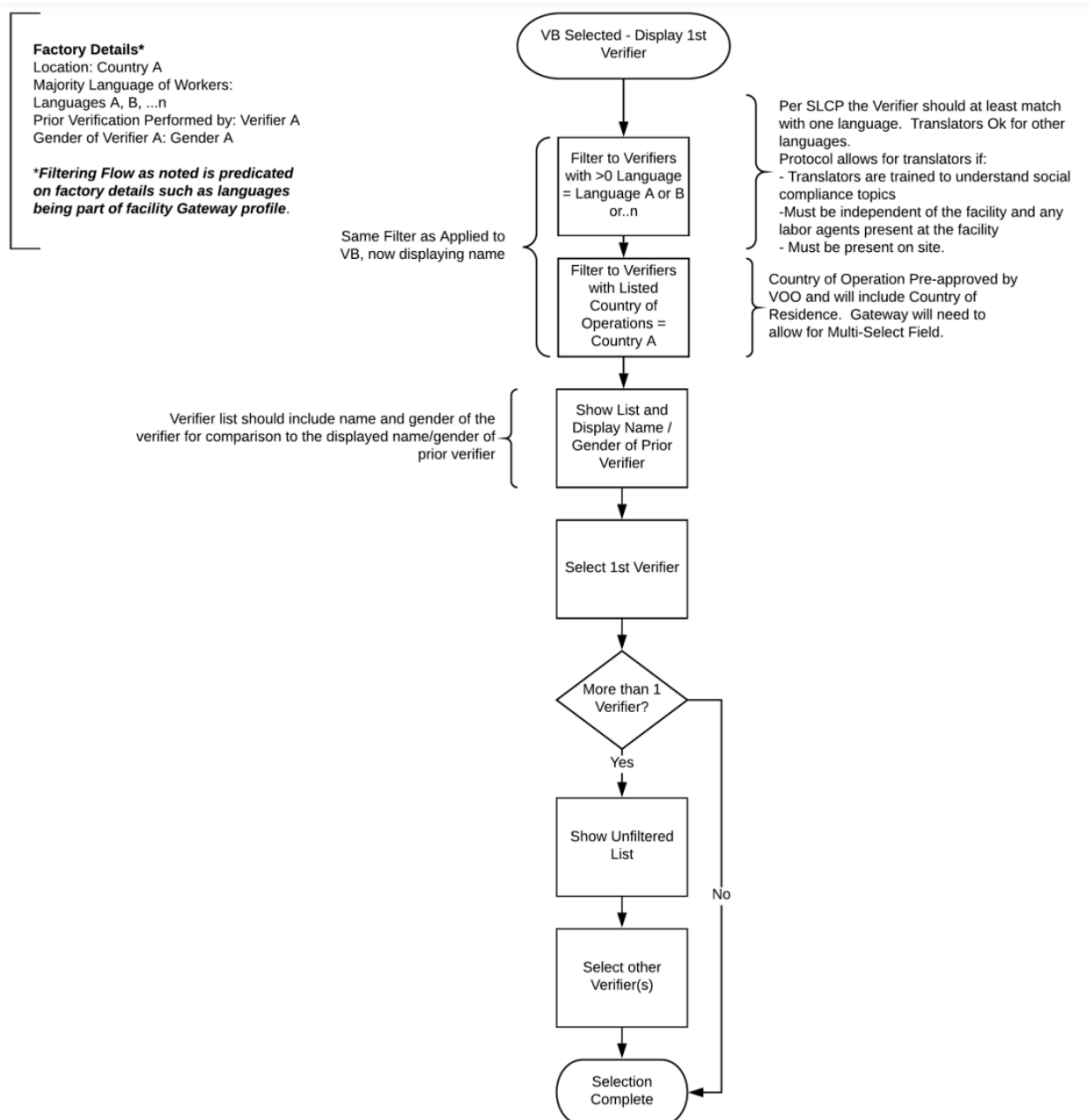
For example, the factory has listed the following as worker languages:

- 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. Below is the flow chart for filtering of Verifiers associated with a VB. The Gateway does not filter by prior verification and gender, but this data will be visible/transparent to the VB so that they can follow Protocol 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.



[Return to the top.](#)

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, “Assessor/Verifier Explanation” for a number of SLCP questions will need to reflect these impacts **in addition to other factors impacting facility operations**.

The 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 Facility Self/Joint-Assessment Response in reference to COVID-19. The table then provides guidance for facilities and information for the Verifier to include in “Assessor/Verifier Explanation”.

There may be additional Facility Self/Joint-Assessment 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 “Assessor/Verifier Explanation”; 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 “Assessor/Verifier Explanation” responses.

Note: Inclusion of **COVID-19 information in “Assessor/Verifier Explanation” 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 | Assessor/Verifier Explanation |
| 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 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). | Include information about any changes to normal hours of operation from closures, reduced working hours or changes to normal operations |
| Facility Profile \ Worker demographics \ Workers | FP-WOR-1 [...] FP-WOR-41 | 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 | Include if there are differences between self-assessment completion and verification are due to COVID-19 |

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| | | | |
|--|--|---|---|
| Worker Treatment \ Discrimination \ Conditions of Work | 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 [...] | "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. | 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. |
| Termination \ Discrimination \ Termination | 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 [...] | 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 | 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) |
| Termination \ Discrimination \ Absence due to Illness | TER-DIS-3: Have decisions of termination, forced resignation, retrenchment or retirement been dependent upon a worker's absence due to illness? | Yes/No This question covers any illness including COVID-19 | Explain if COVID-19 was one illness that played a factor in determining decisions of worker termination, forced resignation, retrenchment or retirement. |
| 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 | Assessor/Verifier Explanation |
| Wages and Benefits \ Wages and Benefits \ Wage Payment | WB-WAG-50: 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: Is the facility failing to comply with legal requirements regarding worker resignation or termination related to: [...] <ul style="list-style-type: none"> • outstanding wages, • termination payments, • termination payments all paid on time, • compensation for unused annual leave, and/or • reinstatement/ compensation orders? | 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 legally required payments to assist workers terminated as a result of COVID-19 | Describe what termination benefits were not paid in line with legal requirements for termination 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. |

| | | | |
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| Wages and Benefits \ Wages and Benefits \ Leave | WB-WAG-91: Is the facility failing to correctly pay workers for any of these types of leave, as legally required: [...] • Sick leave [...] • 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 | Assessor/Verifier Explanation |
| Working Hours \ Working Hours \ Total Working Hours | WH-WOR-16: Did any workers work more than 60 hours in total (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? | These questions are in reference to workers working extended hours for any given reason including COVID-19. | If the answer to any of these questions is yes, and if overtime was worked due to COVID-19 impacts, describe this under “Assessor/Verifier Explanation”. Include details such as whether the overtime was due to a reduced workforce or closures that impacted production planning. |
| Working Hours \ Working Hours \ Records | 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) | 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. | 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. |
| | WH-WOR-4-4: Start and finish times in | If workers are required to clock in/out before/after the | If the facility has adjusted payroll to allow for |

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

| | | | |
|--|---|---|--|
| | | | <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-2: 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 and Diseases | HS-FIR-10: Does the facility record work-related accidents and diseases and report them to the competent authority in line with legal requirements? | <p>Yes/No</p> <p>Facilities must consider any legal requirements for recording and reporting work-related accidents and diseases.</p> <p>This question refers to all work-related diseases including COVID-19</p> | Note the number of workers with confirmed cases of 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 | Assessor/Verifier Explanation |
| Health and Safety \ | HS-GEN-11: Are the facility's | If the facility undertakes regular cleaning/sanitizing to | Provide details of how the facility's sanitary |

| | | | |
|--|---|---|---|
| General Work Environment \ Cleanliness, Sanitation & Waste | sanitation practices in line with legal requirements? | 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 | 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-22: 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-4: 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 \ | HS-HEA-1: Are facility practices out of | Facilities must consider any other legal health and | Indicate any additional legally required health |

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| Health and Safety \ Other Legal Requirements | compliance with any legal requirements not covered elsewhere regarding Health & Safety? | 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 | 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 | Assessor/Verifier Explanation |
| Verification/Assessment Details \ Verification/Assessment Details \ Verification Observations | VD-VERI-21: 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. |

[Return to the top.](#)

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/Assessment 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 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]

[Return to the top.](#)

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 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)
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
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
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

[Return to the top.](#)

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

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

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, language capabilities and/or interpreter support that reflects facility workforce, skills and attributes outlined in the SLCP 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.

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 3.4.10.1).

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

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.

[Return to the top.](#)

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

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.
- 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 Assessor/Verifier Explanation 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
- 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).

[Return to the top.](#)