

# Social and Labor Convergence Program (SLCP) Verifier Guidance Version 1.5-1.1\*

# 25 July 2023

This Verifier Guidance applies to Version 1.5 of the Converged Assessment Framework. This document provides the Verifier with the information necessary to successfully navigate and complete the Tool in Verifier Mode.

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

Disclaimer: This file represents only one aspect of the

SLCP Converged Assessment Framework (CAF).

The file should be viewed in conjunction with the other elements of the CAF relevant for Verifiers and Verifier Bodies: Data Collection Tool and Worker Engagement Question Set,

Verification Protocol, as well as the QA Manual.

\*Version 1.1 of the Verifier Guidance for CAF v1.5





# **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
2022/05/29	Section added on data integrity	Addressed feedback requesting information to be added about data integrity in line with Facility Guidance. Added new section after "Overview of the Converged Assessment Framework".
2022/05/29	Clarification on QA checks added under "1. Navigating the Offline Data Collection Tool"	Second paragraph under "Accessing the Tool for completion" added to clarify that AH quality assurance checks, that focus on data completion and format accuracy, are in addition to the Verifier Body quality check, which focuses specifically on data quality. "Text added to first paragraph under "Accredited Host (AH)".
2022/05/29	Text added under "The use of colors in sections other than Facility Profile" for explanation of "Accurate" response.	Note added to clarify use of Assessor/Verifier Explanation for legal non-compliance detected for an accurate response.
2022/05/29	Data privacy	Added text to data privacy box to clarify facility denial of photos:
		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.
2022/05/29	Uploading the offline Tool and photos/ files/ documents to the Accredited Host platform for completion	First bullet point revised to clarify that both facility and Verifier responses are checked for English language.
2022/05/29	Link to Zendesk for explanation on automatic law overlay countries added to footnote 2	Request for clarity in which countries the law overlay is automated. Since this information is subject to change, a link to where to find this information on Zendesk has been provided.
2022/05/29	text added to section titled "How to use the colors to guide you:"	Text added clarifying that the color guide remains the same for both the online and offline versions of the Tool.
2022/05/29	"Completing required verification fields" table	In response to feedback requesting clarity on meaning of social audit experience: "per social audit experience" changed to "based on the social audit experience of the Verifier".
2022/05/29	"Tool Conditional Questions" under "Tool Features"	Explanation of new v1.4.2 automated feature for "Facility did not reply during SA/JA" and "Not visible to facility during SA/JA"; Removal of reference to Verifier needing to first check the Tool for unanswered questions to select "Facility did not reply during SA/JA".
2022/05/29	Quality of Assessor/Verifier Explanation,  Completing the Assessor/Verifier Selection	Note added to reiterate the automation feature for "Facility did not reply during SA/JA", "Not visible to facility during SA/JA" and "No longer applicable due to verification" with reminder for what selections the Verifier must still enter the Assessor/Verifier Response along with Assessor/Verifier Explanation to support the Assessor/Verifier Response.
2022/05/29	Entire document	All references made to the Verifier selections "Facility did not reply during SA/JA", "Not visible to facility during SA/JA" and "No longer applicable due to verification" have been revised to clarify that these are now automated selections in the Tool.





2022/05/29	Quality of Assessor/Verifier Explanation	Box added 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.
2022/05/29	Completing the Assessor/Verifier Response Tool questions and facility responses Example narrative for Verification/Assessment Details when virtual + onsite verification occurs	The maximum character count has changed from 1,000 to 6,000 characters for free text/ narrative fields in the Tool. The user is permitted from entering more than 6,000 characters.
2022/12/06	Versioning	Updated CAF Version  Version 1.0 of the Guidance for CAF v1.5, hence Version 1.5-1.0
2022/12/06	Relabeling of existing fields in the Tool changes all reference to fields in Verifier Guidance	Table introduced under 1.7. What is new for CAF v1.5? — "1.7.3. 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:  • 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 "Assessor/Verifier Response" changes to v1.5 "Assessor/Verifier Response"  • v1.4 "Verification Data" changes to v1.5 "Assessor/Verifier Explanation"
2022/12/06	Glossary updated	Glossary adapted to include Full Virtual Verification and Worker Engagement elements
2022/12/06	Acronym list updated	Acronym list adapted to include Full Virtual Verification and Worker Engagement elements
2022/12/06	Section 1.7: New Features for CAF 1.5	This section introduces the main elements new to CAF v1.5, specifically:  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 VD-VERI-19)  Country specific questions  Overall change in structure of the Verifier Guidance
2022/12/06	Restructuring of Guidance to make more applicable for both online and offline Tools with some specific reference to offline but also provision of a link to the offline Tool tutorial.	Main sections are: Section 1: Introduction Section 2: The Tool Section 3: How to Complete the Tool Section 4. Full Virtual Verification Section 5: Verifier Body/ Verifier Quality Review Appendices Section headings have changed, and new section added for Full Virtual Verification
2022/12/06	Tables of examples for each subsection under Section 3	Tables are provided in the subsections of Section 3: How Do I Complete the Tool which provide examples for the Verifier on how to proceed within the context of each subsection. Tables are consistent format across all subsections for each of navigation. These examples provide additional detail to the Verification Protocol guidance.
2022/12/06	Appendices added	Appendix I provides a sample agenda for the opening and closing meeting  Appendix II provides a sample of a verification plan for Virtual + Onsite Verification and Full Virtual Verification





2022/12/06		Complete new section to the Verifier Guidance providing the Verifier with information on:
		Facility eligibility
	Section 4: Full Virtual	Verifying facility eligibility
	Verification	Special requirements for verifying Full Virtual Verification
		Worker Engagement Question Set
		• Important requirements for the use of the WE Question Set during verification
		Training requirements for Full Virtual Verification
2023/05/01	Versioning	Version number on title page and in all footers. Version number changed from v1.5-1.0 to v1.5-1.1
2022/05/04	Section 1.5 Ethical Behavior	Revision to reference to VD-VERI-19 for unethical behavior. Details must now be
2023/05/01	Section 2.3.9.	entered into VD-VERI-18 not VD-VERI-19. Changed to read, " Verifier is required
	Verification/Assessment Observations	to enter details into VD-VERI-18: Cooperativeness of facility, after selecting "Yes" for the question [VD-VERI-19]"
2023/05/01  Glossary and section: 1.1.  Overview of the Converged  Assessment Framework  Assessment Framework  Assessment Framework		Replaced the link to the Facility Guidance with two different links. One link provided is specific to the CAF: <a href="https://slcp.zendesk.com/hc/enus/sections/360005179434-Converged-Assessment-Framework-CAF-">https://slcp.zendesk.com/hc/enus/sections/360005179434-Converged-Assessment-Framework-CAF-</a> and the other link accesses information related to training, registration on the Gateway, completing a self-assessment, verification, data sharing and other more general
2023/05/01	Section 2	Maximum number* of questions in each Step Updated numbers (mistakes in previous version)
2023/07/25	Entire document	Links to SLCP document resources updated to correct broken links/ outdated links.



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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





#### **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"

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**

Online guidance provided to facilities, which is embedded in the SLCP Helpdesk. Two different links can be accessed depending on whether the facility is inquiring about training, registration on the Gateway, completing a self-assessment, verification, data sharing or more general questions: <a href="https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF">https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF</a>, or if the facility is inquiring about the Converged Assessment Framework (CAF) more specifically: <a href="https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF">https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF</a>

# 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

The document that contains the procedures, rules and process requirements for a facility undergoing Full Virtual Verification (FVV).

# 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:

- 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 Data Collection Tool (CAF).

**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 Facility alone fills in the Data Collection Tool (CAF).

**SLCP** 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.

The document that contains the procedures, rules and process requirements for conducting all three SLCP validation methods (i.e., Onsite Verification, Virtual + Onsite Verification, Full Virtual Verification).

> 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.

> 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.

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

> 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. Some parts of the verification are conducted virtually in addition to onsite verification

> activities. The SLCP Worker Engagement (WE) 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.

> The facility must conduct the WE Question Set facilitated by one of the SLCP approved service providers.

> The WE Question Set is distributed in form of a digital 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-toread summary report. The report is then disseminated to the facility and the VB/

#### **Verification Protocol**

Verified assessment

Verifier

**Verifier Body** 

**Verifier Guidance** 

Virtual + Onsite Verification

**WE Question Set** 

**Worker Engagement Service Provider** (WE TSP)





Verifier by the Service Provider in a standardized format.

**Technology** 

Worker Engagement 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).





## **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



# **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	The Tool (offline and online) has information in the section introductions that address international labor standards applicable to that specific section/ sub-section topic. This is Law Guidance specific to international labor standards only.
	The Law Overlay is both the Law Guidance by country and the automatic entry of Non-Compliance and Legal Reference according to the Final Response in the Verification Summary.
	The Final Response is the Facility Self/Joint-Assessment Response if Accurate, or the Assessor/Verifier Response and Assessor/Verifier Explanation by the Verifier if the Facility Self/Joint-Assessment Response is Inaccurate – Incorrect or Inaccurate – Misunderstanding.
	On the AH platform, the users (facilities and Verifiers) will see a Law Guidance link (similar to More Info). When they go to that info box, they will see Law Guidance information about country specific legal requirements specific to that question. If Law Guidance at question level is implemented, then the automatic entry of Non-Compliance and Legal Reference is also implemented. The Law Overlay is both the Law Guidance field (country-and question-specific) and automatic entry of Non-Compliance and Legal Reference together as a package.
	See <u>more information here</u> .
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.





#### 1. Introduction

#### 1.1. Purpose of the Verifier Guidance

A verification must be **thorough, reliable, of high quality** and follow the <u>Verification Protocol</u> to enable sharing of trusted social and labor data, the core of SLCP. The SLCP <u>Verification Protocol</u> describes the SLCP verification process, rules and procedures. The Verifier Guidance is intended to be read together with the Verification Protocol to ensure all SLCP approved VBs/ Verifiers have the tools necessary to effectively conduct each of the SLCP Validation methods:

- 1. Onsite Verification
- 2. Virtual + Onsite Verification
- 3. Full Virtual Verification

Each Accredited Host must develop a user guide that will describe how to navigate the platform as a Verifier. These guides are available online: <u>Helpdesk FAQs</u>. Also see <u>here</u> on how to navigate the Higg and FFC platforms. For instructions on **how to use the offline Tool**, refer to this Verifier Guidance and the <u>tutorial</u> available on the SLCP Helpdesk.

Return to the top.

#### 1.2. Overview of the Converged Assessment Framework (CAF)

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

Data Collection	<ul> <li>Used by facilities and Verifiers</li> </ul>
Tool	<ul> <li>Records facility data and Assessor/Verifier Explanation on social and labor conditions in facilities</li> </ul>
	<ul> <li>Executed through AH online platform or through downloadable Excel from AH (available for onsite verification only but online is still recommended)</li> </ul>
Protocols	<ul> <li>Verification Protocol: Verification procedures and requirements for SLCP approved Verifier Bodies and Verifiers</li> </ul>
	<ul> <li>Verifier Bodies and Verifiers receive and maintain SLCP approval by following procedures and requirements outlined in the <u>SLCP Quality Assurance Manual</u></li> </ul>
	<ul> <li>FVV Protocol for Facilities: Facility Protocol for Full Virtual Verification</li> </ul>
	<ul> <li>WE Tech Protocol for Facilities: Protocol for facilities working with the WE Tech Question Set and SLCP approved service providers.</li> </ul>
Guidance	<ul> <li>Guidance for the facility: to understand the assessment process and complete the self/joint-assessment, includes:</li> </ul>
	<ul> <li>Online facility guidance: embedded in the SLCP Helpdesk</li> </ul>
	<ul> <li>For information on the CAF specifically:</li> <li><a href="https://slcp.zendesk.com/hc/en-us/sections/360005179434-">https://slcp.zendesk.com/hc/en-us/sections/360005179434-</a></li> <li><a href="https://converged-Assessment-Framework-CAF-">Converged-Assessment-Framework-CAF-</a></li> </ul>
	<ul> <li>For more general information as well as information on training,</li> <li>Gateway registration, completing a self-assessment, verification and data sharing: https://slcp.zendesk.com/hc/en-us/categories/360000972694-I-am-a-Facility</li> </ul>
	<ul> <li>Facility Guide to Virtual + Onsite Verification</li> </ul>
	<ul> <li>Verifier Guidance: explains how to write the verified assessment report</li> </ul>

You can access all CAF files on our Helpdesk.





#### 1.3. The 12-month self/joint-assessment period

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

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

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

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

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#### 1.4. Data Integrity

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

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

In addition, the <u>SLCP Signatory Charter</u> notes in the Commitment for Manufacturers, Brands & Retailers, and Agents, that they commit to "respect the principle of true data in SLCP verified assessments by recording and accepting honest data, and by prioritizing remediation over punishment".

#### **SLCP Quality Assurance Manual**

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

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#### 1.5. Ethical Behavior

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

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

If the facility engages in unethical behavior, the Verifier is required to **enter details into VD-VERI-18:** Cooperativeness of facility, after selecting "Yes" for the question:

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

VD-VERI-18 is part of the final verified assessment report and will be visible to the facility, therefore only





confirmed details 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 <u>Confidential Information</u> <u>Report Form</u>. Unlike the details entered into VD-VERI-18, the online form is not visible to the facility but internal to SLCP and is shared in confidence with applicable approved VBs and Verifiers (please see 1.6 below for further details).

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

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#### 1.6. Reporting Issues outside Final Verified Assessment Report

As required in the <u>Verification Protocol</u>, Verifiers and/or the VB <u>must</u> submit details about unconfirmed, sensitive or similar information as well as suspicions to the VOO related to their assigned facility via an <u>online</u> form.

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

- Reported information will be kept internal to SLCP and may be shared in confidence with applicable approved VBs and Verifiers.
- Applicable information will be maintained on a private facility profile visible to SLCP, the VOO and any VB assigned a verification for the applicable facility.
- 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.
- 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.
  - 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, please share via the form (information is welcome at any time, not only during or shortly after verification)

# 1.6.1. Examples

	EXAMPLES: Sensitive issues and suspicious activities			
1.		Sensitive information that could not be shared because the Verifier has to keep the identity of the worker confidential to protect from retaliation.		
2.		Information of non-compliances or inaccuracies that could not be shared because they were outside of the assessment scope timeframe.		
3.	_	Unverified interview statement or inability to properly triangulate a finding, which:  - Would result in an "Inaccurate - Incorrect" determination, but unconfirmed so cannot be applied  - Indicates a potential legal issue or non-compliance to generally accepted codes of conduct (e.g., unconfirmed reports of verbal abuse, harassment)		





4.	<ul> <li>Transparency or ethics issues, such as:</li> <li>Facility offers a bribe to Verifier and Verifier cannot include this information in the report</li> <li>Unconfirmed concerns of facility not sharing accurate data, like maintaining double books or falsified records</li> <li>Suspicion of interview coaching, hiding workers/ production, or other manipulation of the verification</li> </ul>		
5.	Suspicion of zero tolerance conditions (on day of verification or within assessment timeframe) like forced labor, human trafficking, hiding presence of ethnic minorities, child labor, etc. Apply your auditor knowledge of zero tolerance issues mentioned in codes of conduct and/or certification programs.		
6. Facility management is obstructive or unprofessional			
Poss	Possible scenarios		
1.	The week after the self-assessment was closed a worker was not paid overtime wages, there is no other non-compliance on OT wage payments in the assessment timeframe, and the facility does not want the finding included in the Assessor/Verifier Explanation.		
2.	During walkthrough the Verifier notices workers diverting their gaze, keeping their heads down and moving away from the areas of focus. The facility has a complaint mechanism for workers but there are zero complaint records. Management ignores workers and become dismissive and agitated if workers are too close to the Verifier.		

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#### 1.7. New Features for CAF v1.5

#### 1.7.1. Validation Method Selection

There are three (3) SLCP Validation Methods:

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

The validation method is captured in question **VD-VERI-1** and is the first question the Verifier must answer, which will determine further questions to be displayed. The validation method options available for the Verifier to select on the SLCP Active Accredited Host platform are:

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

**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.

# 1.7.2. 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.

#### 1.7.3. 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, the new field labels are referenced 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

#### 1.7.4. Verification/Assessment Details

**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.

# 1.7.5. 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

	EXAMPLE: Country Specific Question
Indonesia	RH-EMP-23: Indonesia: Does the facility comply with legal requirements concerning outsourced workers at the workplace?

# 1.7.6. Structure of the Verifier Guidance





- Section 1: Introduction
- Section 2: The Tool explains the features of the Tool and how to navigate the Tool in Verifier Mode
- Section 3: How to complete the Tool Provides information and examples on how to use the Tool dropdown selection options, complete the explanation narrative fields and address some specific SLCP verification topics (e.g., worker engagement). This section also discusses legal compliance and legal reference fields as well as addressing some back-to-basics social auditing methods (e.g., triangulation)
- Section 4: Full Virtual Verification Provides the Verifier with an overview of their responsibilities when conducting Full Virtual Verification (e.g., mandatory Full Virtual Verification training for the Verifier, WE Tech survey)
- Section 5: Verifier Body/ Verifier Quality Review: Addresses what to remember when viewing the facility's Self/Joint-Assessment and what mistakes to avoid.
- Sections 6 & 7: Appendices: Provides sample agendas for opening and closing meeting as well as a sample Verification Plan

This Verifier Guidance is **updated regularly** to incorporate more lessons learned and common mistakes. Please share your thoughts and questions about this Verifier Guidance document in the feedback surveys administered by the Verification Oversight Organization on behalf of SLCP.

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#### 2. The Tool

The offline Tool is available for onsite verification only. SLCP recommends using the online Tool whenever possible; however, the offline capability gives the Verifier flexibility, especially when Internet connections are not stable. The offline Tool can present a number of errors for the user, which can be avoided when working in the online Tool. These errors are discussed in section 2.5.

#### 2.1. Sections and Subsections of the Tool

There are two additional sections of the Tool in Verifier Mode:

- 1) Verification/Assessment Details
- 2) Verification Summary

Common to both the Facility Mode and Verifier Mode of the Tool are the below sections and subsections:





# **Facility and Verifier Mode Sections and Subsections**

Tool Section	Tool Subsection	Number of Questions total (Step 3 scope)
1. FACILITY PROFILE	<ul> <li>Step Selection</li> <li>OAR/ OS ID</li> <li>Basic Information</li> <li>Building Structures</li> <li>Worker Demographics</li> <li>Nationalities</li> <li>Languages</li> <li>Operating Licenses</li> <li>Certifications</li> <li>Production / Operation Information</li> <li>Subcontractors Used for Production / Operation</li> <li>Facility Comments</li> </ul>	320
2. RECRUITMENT & HIRING	<ul> <li>Child Labor</li> <li>Apprenticeship / Trainee / Internship Programs</li> <li>Forced Labor</li> <li>Recruitment Practices</li> <li>Discrimination</li> <li>Employment Practices</li> <li>Homeworkers</li> <li>Facility Comments</li> </ul>	179
3. WORKING HOURS	<ul><li>Working Hours</li><li>Forced Labor</li><li>Overtime</li><li>Facility Comments</li></ul>	59
4. WAGES & BENEFITS	<ul><li>Wages and Benefits</li><li>Facility Comments</li></ul>	220
5. WORKER TREATMENT	<ul> <li>Forced Labor</li> <li>Harassment and Abuse</li> <li>Discrimination</li> <li>Discipline</li> <li>Worker Treatment</li> <li>Facility Comments</li> </ul>	167
6. WORKER INVOLVEMENT	<ul> <li>FOA &amp; CB</li> <li>Workplace Cooperation</li> <li>Grievance Systems</li> <li>Worker Feedback</li> <li>Facility Comments</li> </ul>	142





7. HEALTH & SAFETY	<ul> <li>General Work Environment</li> <li>Building Safety</li> <li>Risk Assessment</li> <li>HS Policy/ Plan</li> <li>Qualified HS Staff</li> <li>HS Committee</li> <li>HS Worker Engagement</li> <li>Emergency Preparedness</li> <li>Flammable and Combustible Materials</li> <li>Chemicals and Hazardous Substances</li> <li>Worker Protection</li> <li>Materials Handling and Storage</li> <li>Safety Warnings</li> <li>Electrical Safety</li> <li>First Aid and Medical</li> <li>Contractor Safety</li> <li>Dormitories</li> <li>Canteens</li> <li>Childcare</li> <li>Children</li> <li>Facilities</li> <li>Health &amp; Safety</li> <li>Facility Comments</li> </ul>	406
8. TERMINATION	<ul> <li>Forced Labor</li> <li>Employment Practices</li> <li>Discrimination</li> <li>Termination</li> <li>Facility Comments</li> </ul>	39
9. MANAGEMENT SYSTEMS (STEP 2 AND 3 ONLY)	<ul> <li>Plan (Policies &amp; Procedures, Strategy and Goals)</li> <li>Do (Roles and Responsibilities, Communication and Training)</li> <li>Check (Monitoring, Self-Assessment)</li> <li>Act (Continuous Improvement)</li> <li>Facility Comments</li> </ul>	535
10. ABOVE AND BEYOND (STEP 3 ONLY)	<ul><li>Workplace Well-Being</li><li>Community Impact</li><li>Facility Comments</li></ul>	139





#### Additional Section of the Data Collection Tool visible in "Verifier Mode"

Tool Section	Tool Subsection	Number of Questions
11. VERIFICATION/ ASSESSMENT DETAILS	<ul> <li>Validation Method</li> <li>Verification/Assessment Dates</li> <li>Verification/Assessment Duration</li> <li>Verification/Assessment Window</li> <li>Verifier/Assessor Information</li> <li>APSCA ID</li> <li>Verification/Assessment Participants</li> <li>Exception Requests</li> <li>Worker Interviews</li> <li>Verification/Assessment Observations</li> </ul>	23
12. VERIFICATION SUMMARY	<ul> <li>Automated information pulling from Verifier answers generated by the Tool with a Verifier click.</li> <li>To facilitate the Closing Meeting and provide the Verifier and facility with a key summary of all "Inaccurate – Incorrect" and "Non-Compliance" items.</li> </ul>	NA

# Maximum number\* of questions in each Step:

Step 1	969
Step 2	Step 1 (969) + 937 = Total 1906
Step 3	Step 2 (1906) + 300 = Total 2206

<sup>\*</sup>Note: this includes all follow up questions so the number of questions may likely be less depending on Facility Self/Joint-Assessment Responses to follow up questions.

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# 2.2. Tool Features

Important: The look of the Tool online will change depending on which Accredited Host system is used for the verification but the **contents of the Tool offline or online and between Accredited Hosts remains the same**. The examples shown here are for the offline Tool and will therefore look slightly different in the online Tools on the AH platforms. See <a href="Helpdesk FAQs">Helpdesk FAQs</a> for guidance and tutorials on how to use each Accredited Host platform.





#### 2.2.1. The Four Parts of the Data Collection Tool

There are four (4) parts to the Data Collection Tool in "Verifier Mode".



- 1) **OVERVIEW** contains important information on the Tool, including enabling macros, SLCP process information and Terms of Use
- 2) **INSTRUCTIONS** explains how to navigate the file, fill in the required content, select the appropriate Step for assessment completion, and understand the applicable standards, scope and timeframe
- 3) **SLCP Data Collection Tool 1.5** contains questions organized into 10 different sections for the facility to complete. The questions that appear depend on what Step has been selected and the answers the facility has provided (e.g., presence of workers under 18, migrant workers, specific operational processes)
- 4) Verification Summary contains a blank table that the Verifier can automatically fill in with "Inaccurate Incorrect" and "Non-Compliance" items by selecting "Click here (no double-click) and wait to create/update Verification Summary" at the very top left corner of the sheet. After the Summary is generated, the Verifier can go back to the SLCP Data Collection Tool 1.4 to make changes and return to the Verification Summary to update it with one click of the link. Hence, the prompt notes "create/update". Double clicking may create an error in the file, so only click once and be patient, especially if the Tool contains a lot of Inaccuracies and/or Non-Compliances.



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#### 2.2.2. The Navigation Bar

The 10 different sections of the Tool are shown in the navigation menu at the top of the Tool. You can click on the applicable section name to jump to that section within the Tool, and you need only to click on a field in an applicable row to see in which section, sub-section and category of the Tool you are currently.

If you are working on a small screen, the navigation bar can be minimalized to show more of the Tool by clicking on the small "-" icon at the left of the navigation bar (see below).



See Verifier Guidance <u>tutorial</u> on how to navigate the offline Tool. <u>Return to the top.</u>





#### 2.2.3. Facility Comments

At the end of each section, the facility is offered the opportunity to provide additional comments under "Facility Comments". These comments will not be verified. Rather, the Verifier can use these comments to see where the facility had difficulties answering questions based on the facility's specific circumstances. These comments also help SLCP to continuously improve the Tool, as well as to increase the Tool's applicability to special circumstances.

When the Verifier first opens the Tool to view the self/joint-assessment data, SLCP recommends looking at this sub-section to see if there are any comments and things of which to be aware.



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#### 2.2.4. Conditional Questions

At times, an Assessor/Verifier Response in <u>Verifier Mode</u> opens a conditional question that was not there before. The Assessor/Verifier Response may unhide multiple questions at once but further down in the Tool.

The most important example is in the Facility Profile where answers will unhide questions in other Sections (Recruitment & Hiring, Wages & Benefits, etc.). If the Verifier finds that the Facility Self/Joint-Assessment Response was Incorrect (Inaccurate or Misunderstanding) and changes the Assessor/Verifier Response, then conditional questions that were hidden for the facility become visible for the Verifier (further down in various sections of the Tool).

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#### 2.2.5. Follow up questions

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

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

**For example**: FP-BUI-7: 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.





#### 2.2.6. Tool "More Info" Guidance

More Info provides guidance on how to answer the question and additional clarifying information to both facility and Verifiers. When you hover (put your cursor on) the "Info" link next to the question, a pop-up box will appear providing you more information. The pop-up size shows the entire information in the More Info at first glance.



"More info" is a valuable resource, and you really should reference this information for every question. Examples of the types of explanatory information provided in "More info" include:

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

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#### 2.3. The Tool in Verifier Mode

There are five (5) columns that apply to the Verifier during verification of the facility responses. These five (5) columns are next to the Facility Self/Joint-Assessment Response in the Data Collection Tool in Verifier Mode. Changes have been made to the labelling of these fields from v1.4 to v1.5 for the online Tool via the AH Host platform. Therefore, the labelling of the fields in the offline Tool differs from those of the online Tool:

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

Note: No changes to the existing fields have been made to the offline Tool – only the online Tool via the AH Host platform. 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.





#### 2.3.1. Color Guide for Verification Completion

The offline Tool works with three (3) colors in the verification portion to guide the Verifier:

Dark Blue: You must complete this field\*

Light Blue: You do not have to act but you may choose to

CR

Light Blue: You have completed this field

\* Note: See Section 0 for the exception to when a dark blue field does not mean that the Verifier must complete the field.

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#### 2.3.2. Using the Colors to Guide You

Before you enter any Assessor/Verifier Explanation, the colors are going to be dark blue for Assessor/Verifier Selection and light blue for all other columns (if the cell is whited out it means that no Assessor/Verifier Response is required (e.g., legal reference)).

The dark blue cells tell you that you need to select an Assessor/Verifier Selection, which is mandatory for each question in the Tool.

**Note:** The below examples showing color are from the offline Tool and therefore show the offline field labels (e.g., Verification selection rather than "Assessor/Verifier Selection"). However, the text refers to the online field labels as this is the preferred method for completing the Tool and is applicable to all three SLCP Validation methods (Onsite, Virtual + Onsite, Full Virtual Verification).





#### 2.3.3. The Use of Colors in Facility Profile

Only in the Facility Profile will you find the field "Updated during Verification". This field is highlighted in red so you can easily find it when discussing the specifics with the facility during the closing meeting. You must enter an Assessor/Verifier Response and explain why the data needed to be updated in the Assessor/Verifier Explanation field. That is why those fields are dark blue (see below).

"Accurate" means no need for further action. That is why the Assessor/Verifier Response and Assessor/Verifier Explanation fields are light blue. There is also no need for checking for legal Non-Compliance as the last two columns are whited out. See below:

Corrected Response	Verification Data	Non-Compliance	Legal Reference
<u></u>			





#### 2.3.4. The Use of Colors in Sections of the Tool other than Facility Profile

#### Inaccurate-Incorrect / Inaccurate-Misunderstanding [Red]

- You must enter an Assessor/Verifier Response and explain in "Assessor/Verifier Explanation" why the data is inaccurate
- There are now two Inaccurate response options
  - 1. Inaccurate Incorrect
  - 2. Inaccurate Misunderstanding (note, that the "more info" accompanying Tool questions aims to keep this response option to a minimum.
- When you enter both "Non-Compliance" and "Legal Reference" both cells change to red so you can easily find them to discuss specifics with the facility during the closing meeting.

	Corrected			7
Verification Selection	Response	Verification Data	Non-Compliance	Legal Reference
Inaccurate - Incorrect	No	During conversion of the three mechanic punch clocks to the electro		Dahir n * 1-03-194 of September 11, 2003 promulgating law n * 65-99 relating to the Labor Code.  Book II: Working conditions and employee remuneration [] Title III: Working hours (normal duration, overtime, weekly rest, public holidays, paid leave, special leave) - arts. 184 to 280 Title IV: Health and safety of employees - arts. 281 to 344 Title V: Salary (determination and payment, minimum wage, deductions) - arts. 345 to 395 https://www.ilo.org/dyn/natlex/natlex4.detail?p_isn=67319&p_lang=en





#### Accurate [Light Blue]

- No need for further action. But you can still determine a legal Non-Compliance if applicable. If the column is not whited out, you should check for any applicable legal Non-Compliances according to the defined applicable legal requirements. See 3.6 for details.
- **Note:** if a legal non-compliance is applicable, the Verifier must explain in "Assessor/Verifier Explanation" the reason for the legal non-compliance along with providing the legal reference to the non-compliance in the "Legal Reference" column.
- You can still add information in the Assessor/Verifier Explanation field (even if no legal non-compliance). It is recommended to do so when relevant.

Corrected  Verification Selection Response	Verification Data Non-Compliance	Legal Reference
Accurate Reference to overtime all	Illowances in Title III: Working hours (norma X	Legal reference information here.

#### Facility did not reply during SA/JA [Dark Blue]

- The Assessor/Verifier Response and the Assessor/Verifier Explanation fields are dark blue because the Verifier must enter the correct response and explain why the facility did not respond in the self-joint-assessment
- If you only complete "Non-Compliance" the Tool reminds you with dark blue to also complete the "Legal Reference" and vice versa (the "Non-Compliance" cell changes red only when "Legal Reference" information is entered)

	Corrected			
Verification Selection	Response	Verification Data	Non-Compliance	Legal Reference
Facility did not reply during SA/JA			x	





## Not visible to facility during SA/JA [Dark Blue]

- You must enter "Assessor/Verifier Response" and you may also want to enter "Assessor/Verifier Explanation" depending on your "Assessor/Verifier Response".
- To determine if this is necessary, reference the Verification Protocol for "Assessor/Verifier Explanation" requirements under the Report Writing Requirements

	Corrected			
Verification Selection	Response	Verification Data	Non-Compliance	Legal Reference
Not visible to facility during SA/JA				
Not visible to facility during SA/JA	X	Assessor/Verifier Response entered to help user understand selection		

#### No longer applicable due to verification

- The entire row can be ignored as that data is no longer applicable. No further Verifier action is needed.

	Corrected			
Verification Selection	Response	Verification Data	Non-Compliance	Legal Reference
No longer applicable due to verification				_

#### Not applicable due to special facility circumstances [Light Blue]

- The facility situation is such that the SLCP provided responses do not apply.
- The Verifier will determine if special circumstances do indeed apply and must explain those circumstances in "Assessor/Verifier Explanation"
- In this case the Verifier does not select an "Assessor/Verifier Response" because the question is not applicable.

	Corrected			
Verification Selection	Response	Verification Data	Non-Compliance	Legal Reference
Not applicable due to special facility circumstances		Explanation provided by Verifier to explain why special facility circu		





#### **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 is applicable (whited out). If the Verifier chooses to add comments under Assessor/Verifier Explanation they can do so, but it is not required. Below is the example of the Facility Comments question. The only Assessor/Verifier Selection option for all the Facility Comments questions is "Verification not Required".



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#### **Completing the Assessor/Verifier Response**

Note: The below examples showing color are from the offline Tool and therefore show the offline field labels (e.g., Verification selection rather than "Assessor/Verifier Selection"). However, the text refers to the online field labels as this is the preferred method for completing the Tool and is applicable to all three SLCP Validation methods (Onsite, Virtual + Onsite, Full Virtual Verification).

The Assessor/ Verifier Response options are in the form of a dropdown menu. The Assessor/ Verifier Response is selected by the Verifier to correct an Inaccurate (Incorrect or misunderstanding) response by the facility. Below illustrates two (2) types of Assessor/ Verifier Response drop down menus:





# 1. "X" or blank (no selection).

If the facility selected "X" and it is Inaccurate (Incorrect or misunderstanding) then the Verifier must select the opposite option, which is blank (no "X"), to correct the Inaccurate response. Making no selection (no "X") will leave the cell dark blue but in this case, it represents an Assessor/ Verifier Response (blank).

	Accurate		
x	Inaccurate - Misunderstanding		Inde
	No longer applicable due to verification		
x	Accurate	X	Sewers,
	Not visible to facility during SA/JA		

	Corrected		
Facility Response (ANSWERS IN ENGLISH ONLY)	Verification Selection	Response	Verification Data
x	Accurate		
x	Inaccurate - Incorrect		Discrepency between payroll and attendance records due to switch

	Corrected			
Facility Response (ANSWERS IN ENGLISH ONLY)	Verification Selection		Response	Verification Data
	Inaccurate - Misunderstanding	X		Occasionally during peak season/ rush orders to ensure hours are re





2. Pre-populated dropdown – including phrases, numbers, "Yes", "No", "Not Applicable", "No applicable legal requirements".

Verifiers must pay special attention to the "More Info" links to choose the appropriate answer.

More Info Facility Response (ANSWERS IN ENGLISH ONLY)  906 Jurements7 Inic. Select; Yes	Verification Selection	Corrected Response No applicable legal requirements INO	Verification Data elerence to overtime allowances in Title III: Working hours (not
907	I	-	
909 es/ levels Info Select: Grade (1/2/3/4/5/6/7) 911 ility have? Number Here: 7	No longer applicable due to verification	Orada (A)0/0/A/5/0/7	_
evel definition, the Tool only supports 3 wage levels (3 entries for facility data). If you have more wage 912		Grade (1/2/3/4/5/6/7) Skill (skilled/ semi-skilled/ un-skilled)	
913 el Grade 1 Number Here: 600 914 el Grade 2 Number Here: 520	No longer applicable due to verification  No longer applicable due to verification	Other Facility does not have wage grade/lev	els

Important: When completing the Assessor/ Verifier Response, you must 'select' your answer from the dropdown menu rather than copying and pasting text from one cell to another as this will cause an error in the color coding of subsequent cells.

After upload of the offline Tool to the platform, the Accredited Host will run some data checks to ensure the Verifier:

- enters only a number where only a number should be
- enters the date in the proper format, as prompted in the question
- does not enter a "Assessor/Verifier Response" when the "Assessor/Verifier Selection" is "Accurate"
- enters only English language text





#### 2.3.6. Verification/Assessment Details

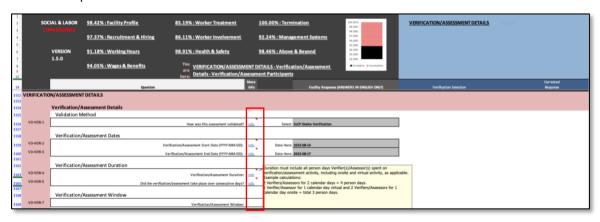
There is a specific section that has to be completed by the Verifier in addition to the verification of the Facility Self/Joint-Assessment Responses. This "Verification/Assessment Details" section is provided when the Tool is in Verifier Mode. Clicking on the link "VERIFICATION/ASSESSMENT DETAILS" will take you directly to that section.



#### Return to the top.

#### 2.3.7. Verification/Assessment Details "More Info"

Just like for the Facility Self/Joint-Assessment Responses, each entry in the Verification/Assessment Details section of the Tool has guidance in the form of a "More Info" pop-up box. This guidance provides details and necessary information on how to complete the field. This is important to read! The Verifier will not be able to complete this section as required if the "More Info" is not read.







#### 2.3.8. Validation Method (online Tool only)

Included in the Verification/Assessment section is the **Validation Method**, which is the preset for each question of the Tool based on the Validation Method selected by the Verifier. **Note:** the options starting with BW are for Better Work facilities only.



The Three (3) SLCP Validation Methods are:

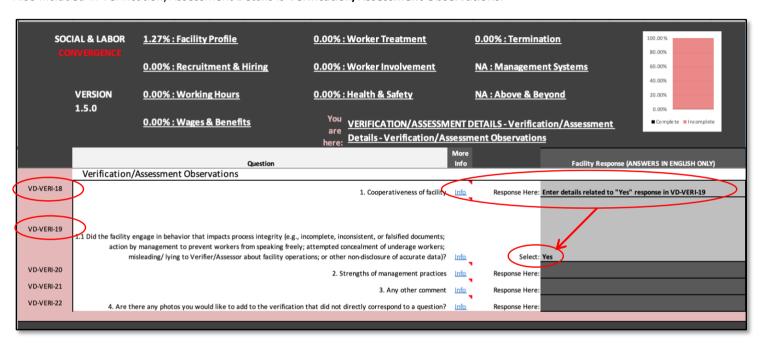
- 1. SLCP Onsite Verification
- 2. SLCP Virtual + Onsite Verification
- 3. SLCP Full Virtual Verification
- If the Verifier selects "SLCP Onsite Verification" or "SLCP Full Virtual Verification" the Validation Method is automated in the online Tool via the AH Platform and the Verifier need not do anything.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





### 2.3.9. Verification/Assessment Observations

Also included in Verification/Assessment Details is Verification/Assessment Observations.



If the facility engages in unethical behavior, the Verifier is required to enter details into VD-VERI-18: Cooperativeness of facility, after selecting "Yes" for the question :

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

This new question is in addition to, the submission of the <u>Confidential Information Report Form</u>. Unlike the details entered into VD-VERI-18, the online form is not visible to the facility but internal to SLCP and is shared in confidence with applicable approved VBs and Verifiers.





### 2.4. Accessing the Offline Excel Tool for Completion

To access the offline Tool for a verification, the Verifier must go to the Accredited Host of the facility's choosing to access the completed self/joint-assessment.

The verification can be completed online (recommended) or through the offline Excel Tool downloaded from the Accredited Host (for onsite verification only). The Verifier is able to go from offline to online to offline again, but the process has to end online.

The AH runs data checks to ensure some data quality aspects are implemented, which may mean review and revision of the offline entered Assessor/Verifier Explanation.

Note: AH quality assurance checks focus on data completion and format accuracy and are in addition to the quality checks that have to be done by the Verifier Body, which, for example, can determine quality failures related to narrative provided in Assessor/Verifier Explanation.

Once the Verifier has access to the Tool containing self/joint-assessment data, the self/joint-assessment data fields will no longer be open for editing or amendment by the facility or Verifier. The Verifier will now be in the assessment status "Verification in Progress" or VRP.

Helpdesk: For information purposes anyone can download the following Tool documents:

- Functional Excel Tool in facility self/joint-assessment mode, which means conditional questions are hidden
- 2. Excel flat file that shows all fields/ all questions in the Tool so the Verifier can familiarize themselves with all questions and the full scope of the Data Collection Tool- useful for sorting/filtering data and further understanding of the Tool.

Note: These documents cannot be used to complete the SLCP assessment process. Only through the Accredited Host can you access the documents for assessment completion

See our Helpdesk to download these documents.

To learn how to navigate the offline Tool please see this short video tutorial.

In addition to the self/joint-assessment answers, the Verifier may also get access to documents or files that the facility uploaded during the self/joint-assessment process. The Verifier can obtain access to any applicable uploaded files via the Accredited Host platform.





### Opening and Saving the Offline Tool after Download from Accredited Host

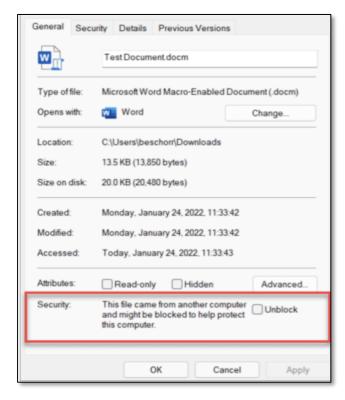
You must have Macros enabled for the content to show up correctly.

Due to the complex nature of the macros included, please only keep ONE Excel workbook open at a time. Opening multiple workbooks may cause user issues.

Version Compatibility: SLCP recommends that PC users have at least Excel 2016 and Mac users have Excel 2016 licenses. If you have followed all instructions on how to handle the Tool and still the Tool constantly crashes while you are working on it, you must download a more recent version of Excel.

According to Microsoft, you must either click on ENABLE MACROS once prompted at opening of the file OR you must unblock Macros by doing the following:

- 1. Save the file to a local hard drive or cloud share like OneDrive.
- 2. Open Windows File Explorer and go to the folder where you saved the file.
- 3. Right-click the file and choose Properties from the context menu.
- 4. At the bottom of the General tab select the Unblock checkbox and select OK.



You can freely rename the document and save it. Remember to save often!

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.

For a short tutorial on how to navigate the offline data collection Tool please go to: https://slcp.zendesk.com/hc/en-us/articles/360014144634-Facilities-how-do-I-enable-content-macro-in-the-Data-Collection-Tool-





### Uploading the offline Tool and Attachments to the AH platform for completion

Once the Verifier obtains access to the Tool for verification from the Accredited Host platform, they can upload and download the Tool as many times as necessary to facilitate completion of the verified assessment report. However, the last step is to upload the offline Tool to the Accredited Host platform and:

- Allow the Accredited Host to run data validation/ checks to ensure specific verification fields are complete and all facility/ Verifier fields are completed appropriately with regards to use of English language, character limit, date and number formats (the quality and accuracy of the data is for the Verifier and Verifier Body to ensure when they review the report before submission)
- Upload/ attach any documentation/ files/ photos to each verified question, as required. For upload instructions, please refer to the user guides of each Accredited Host, available on the SLCP Helpdesk.

Note: the last question in the Verification/Assessment Details work sheet allows the Verifier to upload files/photos/documents and does not directly relate to a question. If the Verifier chooses to upload multiple photos/ documents, it is recommended to create one document (Word or PDF) that contains all files and to label the files/photos appropriately to give the user a clear description of the item.

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#### 2.4.3. Data privacy

Verifier shall follow all applicable data privacy laws and regulations when conducting the verification, this includes taking pictures of and uploading documents in conjunction with the verified assessment report. SLCP recommends only taking a sample and blacking out all private information/information that can be traced back to an individual when providing proof/ documents to back up the verification outcome.

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

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

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#### 2.4.4. **Reviewing Documents**

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





# 2.5. Trouble Shooting/ Errors Guide for Offline Excel Tool

### 2.5.1. Assessor/Verifier Selection

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

### 2.5.2.

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

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

Once you have relaunched Excel, reopened the file and enabled macros, if the navigation bar tells you correctly where you are then you know that the macros are working.

If you are experiencing persistent errors with macros, it is recommended to work in the online Tool to alleviate this issue.



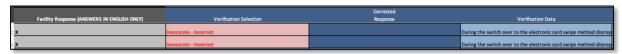


### 2.5.3. Offline Tool limitation

There is currently a slight limitation of the offline Tool for Multi-select dropdown menus that provide the **option for the facility to select 'X' or to leave blank** indicating no selection.

If the Verifier identifies an "X" selection made by the facility as inaccurate and selects "Inaccurate-Misunderstanding" or "Inaccurate-Incorrect", the Assessor/Verifier Response cell remains dark blue because the Assessor/Verifier Response technically has no data selected... even though the blank cell is the Assessor/Verifier Response.

The image below shows one such example.



This also occurs for multi-select options when the Verifier selects: "Updated during Verification" in the Facility Profile section, or if the Tool automatically selects "Not visible to facility during SA/JA" and "Facility did not reply during SA/JA".



If, in the top row in the example above, the automated Tool selection "Facility did not reply during SA/JA" has been selected and the Assessor/Verifier Response is blank (Verifier has made no selection) the Assessor/Verifier Response cell remains dark blue instead of light blue as in the row below indicating a completed Assessor/Verifier Response.

When reviewing the offline Tool before submission to the AH platform, the Verifier should confirm these dark blue and blank cells are indeed Assessor/Verifier Responses rather than responses that have been overlooked.

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#### 2.5.4. **Formulas**

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





# 3. How to Complete the Tool

The Verifier must verify all data\* according to the Step chosen by the facility.

\*All data means all questions that are applicable to the facility. Even if the facility did not provide an answer to the applicable question, the Verifier has to provide an Assessor/Verifier Response. Some Verifier Assessor/Verifier Responses in the Tool will open up conditional questions that the facility did not see during the self/joint-assessment and therefore did not answer. The Verifier must provide the correct answer to these unanswered questions.

In addition to this, the **Verifier has to complete the Verification/Assessment Details section** for more information about the verification. The Verification/Assessment Details provide the Verifier with the opportunity to give further comments about the facility, such as cooperativeness of the facility and strengths of management practices.

# 3.1. How do I accurately complete the Assessor/Verifier Selection Fields?

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.

The rules on what Assessor/Verifier Selection to choose are as follows:

Accurate	Information provided by the facility is 100% correct and supported by data		
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.		
Inaccurate – Incorrect	Information provided by the facility has one or more errors because facility mad mistake or did not share accurate/ honest data (e.g., business license is actually valid anymore). This Assessor/Verifier Selection is chosen if:  - At least one data point shows that the answer is incomplete or incorrect (i.e., facility answer is not 100% accurate); or information cannot be verified (i.e., Verifier cannot prove that the facility answer is accurate)  - If there is a lack of documentation that does not permit accurate verification specific questions		
To be selected by the Verifier when the facility has misunderstood the question wrong understanding of "worker" and including supervisors in the calculations number of workers) and provided an Inaccurate Facility Self/Joint-Asse Response. All definitions and explanations in "More Info" aim to misunderstandings; however, misunderstandings do still happen. It is important SLCP is aware of these for continuous improvement.			
Facility did not reply during SA/JA			
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.
Not applicable due to special facility circumstances:  Not applicable due to special facility circumstances:  This is rarely likely to be used. It offers Verifiers the option of noting if something is applicable' if the question has no "Not Applicable" option. Facility circumstances SLCP has not considered can come up and it is the responsibility of the Verifier to do if these special circumstances mean that all answer options SLCP provides are suitable. If this Assessor/Verifier Selection is chosen by the Verifier, then Assessor/Verifier Response column remains blank and must not be completed because the question is not applicable.	
	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.
No longer applicable due to verification	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.
	<b>Note:</b> No longer applicable due to verification" will be applied for conditional questions depending on the Assessor/Verifier Response <u>AND</u> also if the Assessor/Verifier Selection of the parent question is "Not applicable due to special facility circumstances.
Verification not required	Applicable to a few questions where verification is not necessary. It is the only drop-down selection option in the 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.

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.





# 3.1.1. Requirements for Completion of Verification Fields

- 1. **If a facility is undergoing an SLCP Onsite Verification or a Virtual + Onsite Verification**, a facility can decide to complete data for:
  - Step 1 "Essential": key social & labor compliance questions, which are mostly connected to International Labor Standards (ILS) and National Labor Law (NLL)
  - **Step 2 "Progressive"**: management system questions and supportive social & labor compliance questions, but less critical than those in Step 1.
  - Step 3 "Advanced": questions that go above and beyond social responsibility industry standards. These
    questions are not required by national or international law but rather seek to elevate workplace wellbeing and community impact.

Note: Step 2 includes all Step 1 questions. Step 3 includes all Step 1 and Step 2 questions. See Section 2.1 for a list of the sections and subsections, the number of questions in each section and the number of overall questions in each Step.

- 2. If a facility is undergoing an SLCP Full Virtual Verification, a facility must complete data for:
  - **Step 2 "Progressive"**: management system questions and supportive social & labor compliance questions, but less critical than those in Step 1.

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 accurate 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.

In the Tool, the following must be completed (this is also a Requirement noted in the Verification Protocol):

- All fields in the Verification/Assessment Details section of the Tool (if the Verifier does not have any
  information to enter, the Verifier still has to complete the field with Not Applicable)
- Uploading of photo(s) to the Accredited Host platform at question level as per the direction in the table below
- Verification columns as per the table below





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" <sup>1</sup>	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

<sup>&</sup>lt;sup>1</sup> 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 <u>Section 3.6</u> Identifying and citing when facility is not in line with legal requirements.





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  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





	<ul> <li>If there is a Non-Compliance</li> <li>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</li> </ul>		would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload
Not applicable due to special facility circumstances selected	NEVER BLANK  Must fill in narrative to explain why there is a special facility circumstance that results in the Assessor/Verifier Response not being applicable		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		





# 3.1.2. Examples of Assessor/Verifier Selections and Entries

EXAMPLES: Assessor/Verifier Selections and Entries				
Inaccurate – Incorrect	A facility's business license is no longer valid, but the facility enters in the information as if still valid.	<ul> <li>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).</li> <li>Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current</li> </ul>		
Inaccurate – Misunderstanding	A facility did not understand meaning of casual worker (note, the Tool provides the user with all SLCP definition of terms and data point clarifications in "More Info", which should minimize misunderstandings).	circumstances at the facility. If applicable, Assessor/Verifier Explanation must address:  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		
Not visible to facility during SA/JA	Facility Profile answers unhide questions in other Sections (Recruitment & Hiring, Wages & Benefits, etc.).  If the Verifier finds that the facility was inaccurate by NOT selecting "X", "Yes" or entering a number >0 in worker demographics and changes the Assessor/Verifier Response to "X", "Yes" or a number above 0 then the conditional questions that were hidden for the facility become visible for the Verifier (further down in various sections of the Tool).  In this case, the option "Not visible to facility during SA/JA" will be automatically selected in the Tool and the Verifier must then enter Assessor/Verifier Explanation to support the Assessor/Verifier Response.  If the Verifier finds the facility answered accurately, the conditional questions			
Updated during verification	remain hidden (if the facility did not select "X" or "Yes" or entered "0").  An additional production building was found during verification that was not mentioned in the facility's self-assessment.  In this case, the Verifier must select "Updated during Verification" in the Facility Profile and enter the correct number of production buildings.  Under "Assessor/Verifier Explanation", the Verifier should note why this information was not included in the self-assessment.  If the Verifier suspects that the facility was deliberately providing inaccurate information, this should be noted under "Assessor/Verifier Explanation" and also repeated in Verification/Assessment Details.			





# 3.2. How do I accurately complete the Assessor/Verifier Explanation Fields?

There are a number of different factors that require the Verifier to provide an Assessor/Verifier Explanation:

Content	Examples/ Guidance
Reason for the specific     Assessor/Verifier     Selection	<ul> <li>Why is the Facility Self/Joint-Assessment Response "Inaccurate - Incorrect"?</li> <li>Why did the facility not provide a response ("Facility did not reply during SA/JA")</li> <li>Why was the facility information "Updated during Verification"?</li> <li>Why is the Facility Self/Joint-Assessment Response "Inaccurate - Misunderstanding"? (misunderstanding of the question, limited information available at the time, mistake made, etc.)?</li> </ul>
<ul> <li>Number of persons affected,</li> <li>Name of the policy or procedure in question</li> <li>Dates of the relevant records,</li> <li>Place of incidence or activity,</li> <li>Unusual circumstances, like COVID related exceptions for laws, should be thoroughly detailed</li> <li>Any other information that the user of the data should know to assist them with future follow-up or corrective actions, which outside of the SLCP assessment process.</li> </ul>	
3. Details about policies and procedures	<ul> <li>Verifier must review the policies/procedures comprehensively and then provide details in the Assessor/Verifier Explanation.</li> <li>The main question asks if policies/procedures exist (yes/no). The conditional question then asks for details of the existing policy. At a minimum, the Verifier should attach the policy to the main question; however, for Best Practice, the Verifier should copy and paste the text relevant for the conditional questions and insert into Assessor/Verifier Explanation.</li> <li>The reader can then see exactly what the details are without going to the attachment, enabling them to judge if the policy details meet their CoC requirements. See below under "Examples of Assessor/Verifier Explanation from poor to best to understand what constitutes "Best Practice".</li> </ul>
4. Details about what IS NOT in compliance if Non-Compliance is applicable	<ul> <li>Once the reason for the specific Assessor/Verifier Selection and the details about the current circumstances in the facility have been addressed, the Verifier can then provide details about what is not in compliance with applicable legal requirements. See <a href="Section 3.6">Section 3.6</a> for more information.</li> <li>The only standards that apply to SLCP and must be addressed for every question outside of the Facility Profile is national labor law and international labor standards.</li> </ul>





5. Details about what IS in compliance if compliance is applicable	• If a facility's practice is in-line with legal requirements, it is always Best Practice to include details on that practice so that the end user can better analyze if the facility is in-line with their requirements. Answering simply "As per local law", for example, is not sufficient.			
6. Details about more than one selection made by the facility	<ul> <li>The Verifier must provide users of the report with enough detail to explain the reason/processes behind facility making more than selection due to different processes occurring in the facility.</li> <li>Example: The facility has different processes for clocking in and out for different types of workers (e.g., line workers clock in themselves but those who work in packing/shipping are clocked in by security guards). Therefore, there is more than one select for the question "Who performs the clock-in/clock out function for workers?" – the individual worker and management. In this situation, Assessor/Verifier Explanation should explain that for some categories/types of workers the clocking in and out procedifferent.</li> </ul>			
	The Verifier must also provide additional information in Assessor/Verifier Explanation for accurate responses where circumstances may make the <b>situation unique or irregular</b> , such as reasons for inconsistencies between working hour, payroll, and other records; details on payment or non-payment of overtime or premium rates; and any issues related to forced labor, unethical recruitment, child labor, discrimination, harassment and abuse.			
7. Details about unique or irregular situations even if facility Self/ Joint-Assessment Response is Accurate.	Example:  WB-WAG-5: Do full-time production workers receive AT LEAST the legal minimum wage (and/or wage required by contract, CBA, or other agreement) for all regular hours worked? The intent of this question is to understand if the facility is paying minimum wages in line with legal requirements.			
	<ul> <li>In the case of India, the Variance Dearness Allowance (VDA) legally requires facilities to pay arrear payments to workers for the periods April 2020-March 2021 and April 2021-March 2022.</li> </ul>			
	<ul> <li>Therefore, even if the Assessor/Verifier Selection is 'Accurate', the Assessor/Verifier Explanation must provide details for this question for end users to understand if the VDA was included in wage payments.</li> </ul>			
In sum, the Assessor/Verifier	In sum, the Assessor/Verifier Explanation is addressing, as applicable:  Who   What   Why   Where   When   How   How often, etc.			





Below are five examples of Assessor/Verifier Explanation from poor to best.

# 3.2.1. Examples of best practice for Assessor/Verifier Explanation

# EXAMPLES Assessor/Verifier Explanation from poor to best

Question 1: Does the facility have ergonomic measures in place that consider the requirements of both women and men?

Facility Self/Joint- Assessment Response	Assessor/Verifier Selection	Assessor/Verifier Response	Non- Compliance	Legal Reference:
Yes	Inaccurate - Incorrect	No	"X"*	Law name, year, law article (minimum) Law name, year, law article, relevant law text/ paragraph

<sup>\*</sup> Although the question itself may not ask for "in line with legal requirements", each question outside of the Facility Profile must be evaluated against applicable legal requirements. If the facility is not following such, Non-Compliance must be selected. If Non-Compliance is selected, the Verifier must provide the Legal Reference and details about the Non-Compliance in the Assessor/Verifier Explanation.

Assessor/Verifier Explanation		
Poor	Better	Best
No ouron ourie	No documents to prove that facility has ergonomic	Context: Although the facility has indicated that they have ergonomic measures in place, insufficient supporting evidence has been provided. During the verification, a review was conducted of existing health & safety procedures  Link to question: and no documented ergonomics risk assessment, policy or procedures were found.
No ergonomic measures	measures in place. Observations indicated that sewers used chairs without back support.	Interviews with employees indicated that no policy has been communicated. <b>Types of evidence / Details of evidence:</b> Visual observations indicate that no specific ergonomic safety measures (e.g., adjustable workstations, standing mats) were provided. See attached photos.
	without back support.	<b>Legal compliance:</b> The facility is not in line with legal requirements of needing a risk assessment, a policy based on the risk assessment and implementation of ergonomic measures according to the risk assessment.
Question 2: Has the facility management tried to control, manipulate or interfere with any of the unions in the facility?		





Facility Self/Joint-Assessment Response		Assessor/Verifier Selection	Assessor/Verifier Response
Yes		Inaccurate - Misunderstanding	No
Assessor/Verifier Explanation			
Poor	Better	Best	
Factory misunderstood	Misunderstanding. Interviews and document review onsite indicated no manipulation was used.	Context: Misunderstanding. Although the facility has indicated that they provide incentives to employees keep them from joining a trade union or engaging in trade union activities, it is clear that they have misunderstood the question, and this is inaccurate.  Types of evidence / Details of evidence: During the verification, worker interviews and a review of polici were conducted.  Link to question: There was no evidence to suggest incentives had been provided to keep workers from joining a union	

Question 3: Are workers allowed access to toilets/restrooms at any time?				
Facility Self/Joint-Assessment Response Assessor/Verifier Selection		Assessor/Verifier Response		
Yes	Accurate	Correctly left empty because Assessor/Verifier Selection Accurate		

<sup>\*</sup>Verifiers should provide Assessor/Verifier Explanation, even in cases when the facility answer is "Accurate", if Verifiers think the users of the verified data will benefit from the details in Assessor/Verifier Explanation.

Assessor/Verifier Explanation			
Poor	Better	Best	
Empty, no Verifier entries	Workers were observed accessing bathrooms with no restriction	Context: The facility has accurately indicated that there are no restrictions on access to restrooms.  Types of evidence / Details of evidence: This was confirmed through document review (facility has policy of no restriction on freedom of movement), visual observations of employees freely entering the restroom, and employee interviews. See attached photo of policy no. 1-234 from January 2015.  Link to question: Evidence indicated that workers did not experience any restriction of access to restrooms.	





Question 4: Did the facility comply with legal requirements to inform and/or get permission from governmental authorities in order to work overtime?

Facility Self/Joint-Assessment Response	Assessor/Verifier Selection	Assessor/Verifier Response
No	Inaccurate - Incorrect	Yes*

<sup>\*</sup>Providing the Assessor/Verifier Response 'Yes' opens an additional conditional question that was not there before for the facility, and thus the facility did not answer.

Assessor/Verifier Explanation			
Poor	Better	Best	
Facility has exemption	The accurate answer is Yes. Remark: Facility has exemption from authority issued on 13 <sup>th</sup> May 2018.	Context: Although the facility indicated No, upon further interview with management, they identified an overtime exemption waiver issued by the ABC municipal authority on 13 <sup>th</sup> May 2018, valid until 12 <sup>th</sup> June 2018. Management forgot about this exemption waiver and did not indicate it in the response because although issued, it was not used during that period.  Types of evidence / Details of evidence: See attachment.  Link to question: Overtime exemption waiver issued by the ABC municipal authority.	





Question 5: Are exemption terms accurate, current, valid and followed by the facility?			
Facility Self/Joint-Assessment Response		Assessor/Verifier Selection	Assessor/Verifier Response
Question not shown to facility based on prior answer, thus response is blank		Not visible to facility during SA/JA	Yes
Poor	Better	Best	
Exemption terms accurate	For the designated period 13 <sup>th</sup> May 2018 until 12 <sup>th</sup> June 2018, the exemption was accurate and valid. For the assessment period, this is the only exemption; there are no further current, valid overtime waivers.	Context: The facility did not provide a response, because they answered the question about existence of waiver inaccurately  Types of evidence / Details of evidence: Document review showed for the designated period 13 <sup>th</sup> May 2018 until 12 <sup>th</sup> June 2018, the exemption was accurate and valid. See attachment.  Link to question: For the assessment period, this is the only exemption; there are no further current, valid overtime waivers. The facility did not use the exemption; its overtime hours did not exceed the legal minimum without waiver.	

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### 3.2.2. Accredited Host Final Check

A final check on the completeness of required Assessor/Verifier Explanation will be executed on the Accredited Host platform, when the Verifier changes the assessment status from "Verification in Progress" (VRP) to "Verification Completed" (VRC). The AH ensures that when the Verifier selects "Inaccurate – Incorrect" / "Inaccurate – Misunderstanding" / "updated during verification" the facility Self/Joint-Assessment response is indeed different from the Assessor/Verifier Response. However, it is the duty of the Verifier and Verifier Body (through quality checks) to ensure a high level of quality of the verified data, paying special attention to the narrative the Verifier provides in the Assessor/Verifier Explanation column.





# 3.3. Do I need to enter Assessor/Verifier Explanation for "Accurate" responses?

Always consider the user of the report and their need for details to be able to determine compliance against their code/ standards and how to remediate non-compliances. The user of the report will often benefit from having an Assessor/Verifier Explanation, even if the facility Self/Joint-Assessment response is accurate and in legal compliance.

#### Examples of when to provide Assessor/Verifier Explanation for Accurate responses 3.3.1.

Below are two examples for Step 1 scope where the user of the report would benefit from an Assessor/Verifier Explanation to better understand facility circumstances:

EXAMPLES			
Assessor/Verifier Entries for Accurate Responses			
	Answer options: Yes/ No/ No applicable legal requirements.		
	Whatever the Facility and Verifier answer, this question will always benefit from Assessor/Verifier Explanation completed by the Verifier that explains:		
WORKING HOURS	The maximum overtime per day per department during which pay period		
WH-WOR-11: Are all overtime working hours in line with legal	The maximum overtime per week per department during which pay period		
limits?	<b>Example:</b> The local law permits extra working hours daily due to the availability of less manpower. As this is in line with legal requirements, the Verifier would not enter a Non-Compliance. However, the Verifier would need to make note (even if the Assessor/Verifier Selection is "Accurate") in Assessor/Verifier Explanation that there was an increase, how much and why and how many workers were affected by increase, etc., and that this is permitted by law.		
WAGES & BENEFITS	Answer options: Yes/ No/ No applicable legal requirements.		
WB-WAG-8: Is the facility failing to pay workers correctly for any of these types of overtime hours,	If the Facility answers No, that means they <i>are</i> paying workers correctly for all types of overtime as legally required. But are they paying exactly		
as legally required:	Consider users who may have a specific overtime rate requirement.		
Ordinary overtime hours	They can only determine compliance with their specific requirement if they obtain that information from the Verifier. So, the Verifier should		
Overtime hours performed at	complete the Assessor/Verifier Explanation cell and explain:		
night	What types of overtime are worked at the facility?		
Overtime hours performed on weekly rest days	2) What amount/ what specific rate above the regular rate is the facility paying for each specific type of overtime worked at the facility?		
Overtime hours performed on public holidays?	3) Is the rate/ payment at or above the legal requirement?		



WAGES & BENEFITS  WB-WAG-2: What are the units of rate of pay for production workers? (SELECT all that apply with a "X"): Hourly/ Daily/ Weekly/ Twice a month/ Monthly/ Unit Rate:	If the facility pays workers in more than one type of unit for rate of pay (e.g., Hourly and Unit Rate are both selected), the user of the verified report needs to understand what type of unit for rate of pay is most common in the facility.  For example: if the facility has 100 workers but only 20 are paid by unit rate and the remaining workers are paid hourly then the Verifier must indicate this discrepancy by including in Assessor/Verifier Explanation: 20% of workers are paid by piece rate and 80% of workers are paid hourly.	
WAGES & BENEFITS  WH-WOR-16: Did any workers work more than 60 hours in total (regular + overtime) within any given week?"	The data point is not a legal non-compliance according to the country's law, and the Assessor/Verifier Selection is "Accurate".  However, the response presents a circumstance, that is likely to be a violation of most brand codes of conduct so Assessor/Verifier Explanation should describe further details.	
RECRUITMENT & HIRING  RH-FOR-1: Does the facility use prison labor?	If the facility uses prison labor and answers "Yes", the Verifier should still provide follow up details on the <b>type and number of prison workers</b> would help inform code of conduct or standard compliance requirements. Likewise, details should be provided in Facility Profile to provide clarity where appropriate.	
FACILITY PROFILE  FP-BUI-18: Building is shared with other facilities/ enterprises:	If the facility answers "Yes" and the Verifier identifies the response as "Accurate" the Verifier should provide information on the <b>type and number of facilities / enterprises.</b>	
WAGES & BENEFITS  WB-WAG-17: Are workers paid for all work-related activities outside of regular working hours?	If the facility answers "Yes" and the Verifier identifies the response as "Accurate" the Verifier should provide information on the <b>type of activities in which workers are engaged outside of regular working hours.</b>	





# 3.4. How do I Triangulate Data?

As required in the Verification Protocol, Verifiers must cross-check information from observation and documentation review with information gathered from interviews with both management and workers (e.g., onsite of via WE Tech summary report for Full Virtual Verification) 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., policy documents, photos, worker engagement survey, etc.) must be used to cross check information provided in the self-assessment and to highlight any areas in need of further

The Verifier should have a good understanding of how to connect different sources of information to inform a specific situation. This is included in general social auditing training/ examinations/ certifications. If the Verifier is unclear on how to triangulate (connect) different sources of data to provide a clear picture of a specific situation, SLCP recommends the Verifier refresh their skills on triangulation as this is a critical part of SLCP verification. For example, SLCP encourages APSCA membership for all SLCP Verifiers. To pass APSCA examinations, the Verifier must understand how to use investigative skills and to triangulate a range of information to determine its authenticity and to verify any allegations made by other sources. This includes triangulating information from interviews, documents and observations. Whether you are an APSCA member or have received social auditing certification from another source, your skill set must include methods of triangulation to achieve a successful SLCP verification.

#### 3.4.1. **Examples of Triangulation**

	EXAMPLES: Triangulating data for accuracy			
Violence and harassment	The facility reports that there have been no cases of violence and harassment (i.e., ILO C190) in the facility <b>but:</b> 1) The Verifier notices posters offensive to women on the walls of the canteen and toilets during facility walkthrough  2) The facility has no clear policies on violence and harassment in the workplace  3) Workers report Gender-Based Violence and Harassment (GBVH) incidences in worker interviews.  These observations and worker interviews contradict the report made by the facility. The Verifier must correct the information provided by the facility (Assessor/Verifier Response) and provide details in Assessor/Verifier Explanation and Verification/Assessment Details to enable the user of the report to identify any necessary remediation efforts.			
Hours of work	In interviews, facility management says that workers do not work on Sundays but:  1) During interviews, workers say they do work Sundays  2) There is a broken needle entry or accident entry on a Sunday  3) The security guard says there is Sunday work  Evidence collected through other sources (accident report, interviews with security guard and workers) provides the Verifier with enough evidence to suggest the facility response is Inaccurate - Incorrect. The Verifier must select the Assessor/Verifier Response and provide the reason for the change in Assessor/Verifier Explanation.			



<sup>&</sup>lt;sup>2</sup> https://www.theapsca.org/resources/competency-framework-d-011/



### How do I Identify Isolated and Systemic Issues?

You must use your powers of observation and social auditing skills to identify if an issue you uncovered on the day of verification is isolated or systemic. It is critical that you provide enough details for the user of the verified assessment report to comfortably make a determination.

- 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

The method of triangulation comes into effect in identifying systemic issues as the answer may not be evident until the Verifier digs deeper. In the below example, the Verifier needed to look into the types of health and safety training that workers undergo to identify if they are permitted to touch fire extinguishers. The Verifier may decide to also check maintenance records as extinguishers could be undergoing scheduled maintenance.

The Verifier must record their actions and findings clearly in Assessor/Verifier Explanation.

### **Examples of Isolated and Systemic Issues**

### **EXAMPLES**

**Identifying Isolated and Systemic issues** 

### Example 1:

The facility reports that all our fire extinguishers are mounted.

However, on the day of verification unmounted the fire extinguisher and put it on the floor.

Although 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 record what the Verifier saw/ determined before the facility acted, as the inaccuracy/ noncompliance may be repeated in the future due to it being a systemic issue.

### Example 2 – Isolated Incident:

A facility with a hiring system that includes a robust age verification procedure experiences child labor because the new human resources associate was not trained sufficiently on procedures.

Although this could be considered an isolated incident, it could develop into a systemic issue if proper remediation efforts are not put in place. The Verifier must record the situation in detail so that the user has the necessary information to make the appropriate decision.

### **Example 3 – Systemic Incident:**

It was noted that the facility employs 10 juvenile workers whose hours are not monitored at all and 8 of them have worked over 30 hours a week for at least 2 weeks in a row, maximum 4 weeks in a row. This also is not in compliance with applicable legal requirements. Thus, Verifier applies a Non-Compliance and provides the Legal Reference.





# 3.6. How do I identify and explain when a 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.

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### 3.6.1. Tool meaning of "Consult applicable legal requirements"

The 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
- 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





# The Law Overlay and Automated Entry of Non-Compliance and Legal Reference

Law Overlay will be provided by 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 in the form of "Law Guidance". 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.

The Law Overlay = Law Guidance and the automated application of the law information depending on the Verifier's actions. If the Final Response determined by the Verifier results in a Non-Compliance, and 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 Self/Joint-Assessment Response means the facility Self/Joint-Assessment response if the Assessor/Verifier Selection is "Accurate", or it is the Assessor/Verifier Response.
- Once the Final Self/Joint-Assessment Response has been determined. The Accredited Host will automatically complete the Non-Compliance "X" and the Legal Reference narrative as per Better Work provided information. For Step 1 questions with Law Guidance, the Verifier no longer has to determine whether a specific facility circumstance is not in compliance with applicable legal requirements. The system will automatically do it for them. This feature increases report quality through standard application of non-compliances and legal references.

Applicable legal requirements are set out in the Law Overlay for select countries only.

If applicable legislation does not cover or sufficiently address an issue regarding compensation; contracts; occupational safety and health or working time, other benchmarks may be used as long as they are based on international standards and good practices and:

- derived from international instruments
- 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

Remember, Law Overlay is not included for all countries and all questions. There may also be noncompliances 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.

Important: For the countries where the Law Overlay is enabled, if you complete the Non-Compliance and Legal Reference text in the offline Tool, the automated Law Overlay will be applied once the offline Tool is uploaded to the Accredited Host platform and may erase or change your entries or add new entries. This is a limitation of the offline to online communication as it relates to the Law Overlay feature for Verifiers.

The Verifier can override the automatic completion of Non-Compliance and Legal Reference, though it is highly unlikely that the Verifier will need to do so. If the Verifier overrides the automatic completion, this special circumstance (that would usually result in a Non-Compliance but in this special facility case does not) must be explained in Assessor/Verifier Explanation. See also our Helpdesk for more information.





# 3.6.3. Examples of Legal Reference Questions

There are two (2) different types of legal requirement questions in the Tool:

- 1. The data point asks if a practice taking place is in line with legal requirements.

  For these questions, legal compliance is the main basis and the most important aspect to assess.
- 2. The data point asking if practices are in line with legal requirements is conditional on a separate data point asking if the specific practice takes place

For these questions, it is first important to assess whether something is taking place/ is provided no matter what the law states. This is especially important in instances where the requirement may go above and beyond common legal practices or where brand codes or standards require the facility to implement something even if it is not legally required.

See the table below which show two (2) examples of both types of legal requirement questions in the Tool (indicated by numbers 1 & 2).

	EXAMPLES  Legal Compliance Questions			
Qu	estion	More Info		
1.	RH-REC-8: Are recruitment fees and related costs paid by workers in line with legal requirements?	Consult applicable legal requirements before answering this question.  If there are no applicable legal requirements, answer No applicable legal requirements. []		
2.	HS-EME-3: Does the facility have a fire detection (e.g., smoke/heat detector) system in place?	The purpose of a fire detection and alarm system is for early detection and reporting, so as to reduce the time needed to implement fire-fighting measures and to limit the impact of the fire.		
	HS-EME-4: Is the fire detection and alarm system in line with legal requirements?	Consult applicable legal requirements.  If there are no applicable legal requirements, answer No applicable legal requirements.		
1.	•	The intent of this question is to understand if the facility maintains one working hour record only for workers and if it is accurate (working hours reflect actual facility operations) and complete (the record is maintained for all workers).		
	one accurate set of working hour records?	Note, that should any legal non-compliances regarding the maintenance of the working hour record be identified by the Verifier/ Assessor, a legal Non-Compliance will be applied for this question.		
2.	RH-DIS-2: Which of the following elements are referenced in written job descriptions or job applications? (SELECT all that apply with a "X")  Race / Skin Color  Are written job descriptions or job application forms that reference an applicant's race / skin color in line with applicable legal requirements?	Consult applicable legal requirements before answering this question.  If references to race / skin color are in line with applicable legislation that allows for preferential treatment in hiring, answer Yes.  If there are no applicable legal requirements that allow for preferential treatment in hiring, apply ILO Convention 111 and answer No.		





### 3.7. How do I Review and Verify Wages and Hours Records?

### 3.7.1. Reviewing Records

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.

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

### **EXAMPLES**

# **Reviewing Wage and Hours Records**

**Example 1**: If a Facility Self/Joint-Assessment Response is "Inaccurate - Incorrect" for working hours, **the Assessor/Verifier Explanation will be based on the documents the Verifier sampled** that showed the inaccuracy.

There is **no need to look for additional examples** if the minimum scope of document review was completed. However, **the Verifier can choose to sample more** to better understand the extent of the problem

**Example 2**: 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 Self/Joint-Assessment Response is Inaccurate - Incorrect. The Verifier must ask the facility to present the records showing overtime so the Verifier can accurately reflect the facility circumstances.

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# 3.7.3. Reviewing Units of Rate of Pay

When reviewing units for rate of pay, Verifiers 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.

### 3.7.4. Example of Reviewing and Verifying Units of Rate of Pay

# **EXAMPLE**

# **Reviewing Units of Rate of Pay**

If the facility has 100 workers but only 20 are paid by piece rate and the remaining workers are paid hourly then the Verifier must record this in Assessor/Verifier Explanation (i.e., 20% of workers are paid by piece rate and 80% of workers are paid hourly).

The user of the verified report can then better understand the most common type of wage payment in the facility.





# How do I verify number of languages that must be spoken by management?

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

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

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

#### Examples of how to verify the number of languages spoken by workers 3.8.1.

### **EXAMPLES**

Number of languages spoken by workers

# Example 1:

- 90% of workers speak only Tamil
- 10% of workers speak Hindi and Tamil

Answer: One (1) language must be spoken by supervisors and management to effectively communicate with ALL workers since 100% of workers speak Tamil.

In this case, supervisors and management need only speak Tamil to be able to effectively communicate with 100% of workers in the facility

### Example 2:

- 90% of workers speak only Tamil
- 9% of workers speak Hindi and Tamil
- 1% of workers speak only Hindi.

Answer: Two (2) languages must be spoken by supervisors and management to effectively communicate with ALL workers since 99% of workers speak Tamil and 1% of workers speak Hindi.

In this case supervisors and management must speak Tamil and Hindi to be able to effectively communicate with 100% of workers in the facility.

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# How do I Address Facility Concerns during Verification/ Closing Meeting?

The Verifier must address any facility concerns brought up during the verification/ closing meeting within two days (48 hours) from end of onsite verification and address any applicable requests for edits by the facility within the 14-calendar day review period in VRC.





#### **Example of Using the 48-hour Period to Address Facility Concerns** 3.9.1.

# **EXAMPLE**

### **Addressing Facility Concerns**

If a facility is unsure if they can share a document due to confidentiality, then the Verifier can use the 48 hours period after the onsite assessment to allow the facility to share more information with the Verifier. During the onsite, it should be evaluated that this document really exists and is something that is being implemented.

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### 3.10. How do I Verify Worker Engagement in the Facility?

It is in the facility's interest to involve workers and, if applicable, workers' representatives in the self/jointassessment process.

A worker management committee functions as a forum for communications, consultation and deliberation between a facility and representatives of trade unions (if applicable) or workers. A worker management committee is also responsible for identifying, reporting and verifying issues.

The overall aim is to increase workers' productivity and welfare, which in turn will ensure the sustainability of the business.

The Verifier must confirm if the facility engaged workers in the SLCP process (VD-VER-20) and then also follow up with the worker management committee to understand the extent of engagement by workers (VD-VER-21). All information should be included in the Verification/ Assessment Details section of the Tool as well as including any additional, relevant information about the process.

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

### **EXAMPLE: Verifying Worker Engagement in the Facility**

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

Note: SLCP Full Virtual Verification requires the facility to deploy the SLCP WE Tech Question Set using one of the SLCP approved Service Providers. It is required that the process involve either a worker engagement committee or trade union/ worker representatives. Please see Section 4.4 for more information.





### 3.11. What is the Verification Summary?

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 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

The Verification Summary is used to go over the main issues that should be of concern to the facility, so that the Verifier can use the Summary to facilitate the conversation with the facility and keep the entries to a minimum (e.g., not final fully written out Assessor/Verifier Explanation). It is therefore not important to complete all the Assessor/Verifier Explanation or the Legal Reference information immediately onsite (regardless of the country and if the Law Overlay is in place). The Verification Summary also helps the Verifier to complete the verified assessment report.

Once the Verifier has completed verifying all questions applicable to the facility according to the Step chosen in the self/joint-assessment, then the Verifier is ready to generate the Verification Summary.

If the Verifier wants to complete ALL the content in the Verification Summary DURING the onsite verification, then they must Complete the "Verification Start Date" in the Verification/Assessment Details section, as well as the "Assessor/Verifier Selection", "Assessor/Verifier Response", "Assessor/Verifier Explanation", "Non-Compliance", and "Legal Reference" data entries.

SLCP recommends that if you are pressed for time during the onsite verification, you can leave intensive items like Assessor/Verifier Explanation and Legal Reference incomplete, because, again, the purpose of the Summary is to facilitate the closing meeting, not to provide the facility with the full and complete Summary at the end of the verification.

Note: The facility will get a complete and accurate Verification Summary together with the verified assessment report for review and final approval 10 calendar days after the onsite verification. The Verification Summary is a report writing requirement for the Verifier and is explained in detail in the Verification Protocol.





### 3.11.1. How do I Generate the Verification Summary?

Go to the Verification Summary section (the last sheet in the offline Excel Tool) and select "Click here (no double-click) and wait to create/update Verification Summary" at the top left corner of the tool:



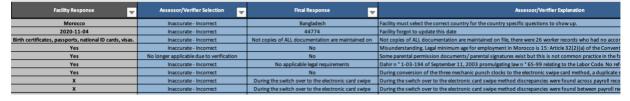
Only when you press this button (and press it only once), will the data feed from the question work sheet to the Verification Summary. Any time the Verifier makes an update to the Assessor/Verifier Explanation they want captured in the Verification Summary, they have to click once on "Click here (no double-click) and wait to create/update Verification Summary".

This is also the case for any download of the offline Verifier Mode Tool from the Accredited Host. After download, the Verification Summary is blank, but if content is already there to inform the Verification Summary, the Verifier will have to select the "Click here (no double-click) and wait to create/update Verification Summary" prompt to generate the Summary.

Double clicking may create an error in the file, so only click once and be patient. Especially if the Tool contains a lot of Inaccuracies and/or Non-Compliances it may take some time to generate.

Facility Profile completion for Verification Summary generation is not necessary, as no "Inaccurate – Incorrect" and "Non-Compliance" selections are possible in the Facility Profile. However, the Verifier should still complete all "Updated during Verification" items to facilitate the closing meeting.

The Verification Summary shows the facility responses in grey and the verification portion in blue.







### 4. Full Virtual Verification

# 4.1. Facility Eligibility

SLCP now permits facilities to conduct Full Virtual Verification but only under special circumstances and in compliance with a set of SLCP eligibility requirements.

A facility is eligible for SLCP Full Virtual Verification if:

- 1) The facility is **currently** experiencing a restriction in operations due to force majeure,
- 2) The restriction in operations that the facility is experiencing due to force majeure has continued for the past 3 months or longer,
- 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. The facility must also complete and sign an SLCP Full Virtual Selfdeclaration form affirming and providing evidence that the above three points are true. The facility must also confirmation that they meet additional eligibility requirements for Full Virtual Verification, i.e., technology requirements, operational capacity, electronic record keeping.

If a facility is eligible for Full Virtual Verification the facility must agree to deploy the SLCP WE Question Set which is a mandatory part of the SLCP Full Virtual Verification process.

The number of questions for Full Virtual Verification has been reduced to adequately verify facility conditions. However, 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 accurate 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.

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# 4.2. Verifying Facility Eligibility

It is the responsibility of the VB/ Verifier to verify that the facility has completed and signed the Full Virtual Verification Self-declaration form and provided evidence attesting to the eligibility requirements for force majeure.

If the facility has not completed and signed the SLCP Full Virtual Verification Self-declaration form the Full Virtual Verification cannot commence.

SLCP recognizes that operating under force majeure involves unique circumstances that may make it difficult to fall within the exact parameters outlined in the self-declaration form. If SLCP has granted an exception to any one of the three (3) force majeure eligibility requirements, the VB/ Verifier must also be provided evidence of this exception.

Important: 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.





# 4.3. Special Requirements for Verifying Full Virtual Verification

- The Verifier must confirm that all policies and procedures are attached to the applicable data point/ question in the self/joint-assessment prior to starting the Full Virtual Verification.
- The Verifier must also be granted access to and reference the final verified assessment report data from the immediately preceding verification for consistency of findings from virtual verification. 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.
- The Verifier must request proof of presence of specific policies and procedures onsite during the virtual tour. Specific documents requested will not be made known to the facility prior to the date of Full Virtual Verification and must be available upon request.

See the <u>Verification Protocol</u> for all mandatory Full Virtual Verification requirements.

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### 4.4. WE Question Set

Deployment of the WE Question Set for facility workers is a mandatory element of SLCP Full Virtual Verification. The WE Tech Service Provider (WE TSP) generates a 100% anonymous, aggregated summary report that:

- a) supports the facility in completing the self/joint-assessment accurately
- b) supports the Verifier in completing the SLCP verification accurately
- c) is attached to the final verified assessment report to be shared with end users.

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. See Verification Protocol v1.5 for further details.

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.

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### 4.4.1. FVV Verification Plan

The Verification Plan for Full Virtual Verification must include a buffer in timelines to ensure the facility meets the target response rates (as best possible). The VB/ Verifier, facility and WE Tech Service Provider must all work together in reaching the target response rates (or coming close to them) and adjusting the timelines to accommodate if necessary. See the Verification Protocol for details.





### 4.5. Important for the use of the WE Question Set during Verification

- 1. The Verifier must have a copy of the WE Tech Summary Report before starting verification
- 2. **The Verifier must** use the WE Tech Summary Report as a source of information to triangulate with other sources of data collected during verification (e.g., incident reports, observations, management interviews)
- 3. **The Verifier must** record in Assessor/Verifier Explanation what Tool questions were informed by the WE Question Set and the Verifier must attach any relevant documents to the specific question or, if more general, to FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section
- 4. **The Verifier MUST NOT** help the facility to interpret the data in the WE Tech Summary Report and must not help the facility formulate a detailed improvement plan based on the WE Tech Summary Report.

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### 4.6. WE Tech Summary Report Action Planning

The facility is expected to use the WE Tech Summary Report to write up an improvement plan. This action will likely take time and not be completed prior to self/joint-assessment finalization. However, any documentation or planning made in response to the WE Tech Summary Report must be prepared for the verification and shared with the Verifier.

It is the Verifier's role to check whether the facility has documented any post-WE Tech action planning and/or write up what action has already been taken by the facility in the Assessor/Verifier Explanation of the verified assessment report.

The Verifier only attaches facility documentation or writes up facility statements about WE Tech Summary Report follow-up actions. **The Verifier will not judge or evaluate the information shared by the facility**. The information provided by the Verifier will help SLCP report users (the facility's business partners) understand how the facility interprets the survey results and what action the facility has taken or intends to take. Return to the top.

# 4.6.1. Completed Facility WE Tech Summary Report Actions

If a question from the WE Question Set relates to a specific Tool question, the Verifier shall ask if the facility has done 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.). 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

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# 4.6.2. Facility post-WE Tech Summary Report action planning

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





Important: Full Virtual Verification does not include worker interviews (only the WE Question Set); however, SLCP encourages the use of the WE Question Set for all SLCP verifications to gain an even better understanding of the worker experience in the facility. If the facility decides to conduct the WE Question Set for an SLCP Onsite Verification or Virtual + Onsite Verification, the Verifier MUST NEVER use the same questions from the SLCP WE Question Set to interview workers to verify survey results. The WE Question Set questions must remain entirely separate from worker interviews conducted onsite.

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### 4.7. Full Virtual Verifier Training

For an SLCP approved Verifier to be eligible to conduct an SLCP Full Virtual Verification, the Verifier must undergo mandatory Full Virtual e-learning prior to conducting a Full Virtual Verification. The Full Virtual Verification e-learning course must be completed successfully and the Verifier will receive a certification of qualification. Only then, can the SLCP approved Verifier conduct an SLCP Full Virtual Verification.

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.

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# 5. Verifier Body/ Verifier Quality Review

Before submitting the verified assessment report for facility review, the Verifier Body/Verifier must do a quality check. The Accredited Host ensures some minimal data quality review through data validation and completion checks, but the accuracy of the Assessor/Verifier Selection and Non-Compliance applicability, along with the quality of the content of the Assessor/Verifier Explanation and Legal References are the responsibility of the Verifier/Verifier Body.

### 5.1. 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.

### 5.2. 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.

# 5.2.1. Example of a Report with a Low Verifier Quality Score

# **EXAMPLE: Low Verifier Quality Score**

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.

### 5.3. What should I remember when reviewing the facility's Self/Joint-Assessment?





- Verification entries must be in English
- All entries must use correct spelling and grammar
- Verification entries, including photos, do 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.
- Photos are attached, at minimum, where the Assessor/Verifier Selection is "Inaccurate ^Incorrect" or "Inaccurate - Misunderstanding", and the Verifier has visual proof
- Photos/ attachments accompany the correct question/ topic, i.e., it is clear what question or what topic they refer to
- Where the Verifier identifies that the facility is not in line with applicable local laws, Assessor/Verifier Explanation, Non-Compliance and Legal Reference are included
- If any part of the Facility Self/Joint-Assessment Response is inaccurate, i.e., the Facility Self/Joint-Assessment Response is not 100% accurate, "Inaccurate - Incorrect" must be selected
- When applicable, any time the Assessor/Verifier Explanation field is completed, the Verifier must provide a thorough response considering the key characteristics of Assessor/Verifier Explanation narrative. Return to the top.





### 5.4. What mistakes should I avoid?

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

Common	Mistakes	Explanation
	A Verifier does not enter the "Assessor/Verifier Explanation" correctly when marking a question as "Inaccurate - Incorrect" or "Inaccurate - Misunderstanding".	<ul> <li>The Verifier must:</li> <li>Cite the type of evidence reviewed to determine the question was "Inaccurate"</li> <li>Provide details on whether the issue was "systemic" or "isolated"</li> <li>Fully describe the circumstances (the who/what/when/where of the issue)</li> <li>Do not write the narrative like a non-conformance (e.g., "facility should install an eyewash station")</li> </ul>
	A Verifier attempts to show that a facility answer is "partially inaccurate" by entering an Assessor/Verifier Selection of "Accurate" and then explaining the details of the part of the answer that was inaccurate in the Assessor/Verifier Explanation.	Answers cannot be partially accurate—either accurate or inaccurate ("Accurate — Misunderstanding" or "Inaccurate — Incorrect"). Information provided by the facility must be 100% correct and supported by data. Any instance of inaccuracy must result in an Assessor/Verifier Selection of "Inaccurate - Misunderstanding" or "Inaccurate — Incorrect".
	For the automated selection "Facility did not reply during SA/JA" the Verifier does not enter the Assessor/Verifier Response or Verification/Assessment Details.	Verifiers must enter the Assessor/Verifier Response and Verification/Assessment Details providing a short statement of what information was reviewed to support the Assessor/Verifier Response.
	For the automated selection "Not visible to facility during SA/JA", the Verifier does not enter the Assessor/Verifier Response or Verification/Assessment Details	Verifiers must enter the Assessor/Verifier Response and Verification/Assessment Details providing a short statement of what information was reviewed to support the Assessor/Verifier Response.
	A Verifier enters an Assessor/Verifier Selection of "Accurate" but then includes an Assessor/Verifier Explanation that indicates the Facility Self/Joint-Assessment Response is inaccurate.	The Verifier must enter Verification/Assessment Details that <b>positively support</b> the Verifier's Assessor/Verifier Selection.





A Verifier does not add necessary clarity or more information to a Facility Self/Joint-Assessment Response.	The Verifier must ensure there is sufficient and clear information in the facility's free text responses (this is mostly applicable to Follow-up Questions)
A Verifier does not <b>enter legal issues correctly</b> .	This includes:  Raising a Non-Compliance when an "Inaccurate - Incorrect" or "Inaccurate - Misunderstanding" Assessor/Verifier Selection relates to a legal requirement  Raising a Non-Compliance when an "Accurate" Assessor/Verifier Selection relates to a legal requirement
A Verifier does not read the "More Info".	The More Info is there for the facility and the Verifier. If there is any doubt in the Verifier's mind that the facility did not respond accurately, the Verifier must consult the "More Info". Consulting "More Info" avoids misunderstanding or misinterpretation of the questions and ensures correct verification
A Verifier does not take the time to assess the accuracy and completeness of the information provided by the facility.	Verifiers have marked questions as "Inaccurate" because of <b>perceived</b> non-compliances, rather than properly assessing the information, which has resulted in incorrect verification.
A Verifier does not include details in the Assessor/Verifier Explanation field so the user of the report can better determine remediation efforts	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.

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# 5.5. 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 <a href="https://slconvergence.org/verifier-qa">https://slconvergence.org/verifier-qa</a> to see if your question has already been answered. The questions are organized by topic and subtopic to help you easily search for an answer and we are adding to it regularly.





# 6. Appendix I: Sample Meeting Agendas

# 6.1. Opening Meeting Agenda Recommendations

- 1. Introductions between the verification team and facility management personnel
- 2. Reviewing the scope and activities of verification
- 3. Reviewing a facility floor plan/facility map to ensure that all appropriate areas are part of the onsite/ virtual walk-through activity. Facility should advise whether Verifiers need PPE or a safety orientation to mitigate any health and safety risks if conducting verification onsite
- 4. Clarifying that the verification goal is to check that the assessment was completed correctly, to validate the accuracy of the data provided and to highlight any inaccurate data (incorrect or misunderstanding) or circumstances of not following legal requirements
- 5. Explaining that data, including potentially confidential data, will be gathered during the verification. Data that can be linked back to a specific individual/ worker will be kept confidential and none will be shared outside the verification team with one exception: data can be made available to the SLCP VOO for quality review or investigation into the work of the Verifiers
- 6. Description of the report methodology and associated timelines for delivery of the verified assessment data, review of the verified assessment report, raising of concerns or questions to the VB/ Verifier, and raising of a formal Dispute.

# 6.2. Closing Meeting Agenda Recommendations

- 1. Thank facility management for their time
- 2. Explanation of SLCP to the facility once more
- 3. Explanation of where there were discrepancies between the self-assessed information and the Verifier data. This will be based on the Verification Summary (if Verifier had time to fully complete). Otherwise, conversation will focus on "Inaccurate-Incorrect" and "Inaccurate-Misunderstanding" and "Non-Compliance" items
- 4. Cooperation of staff and availability of information
- 5. Confidentiality of the results
- 6. Informing facility that the verified assessment data will be delivered within ten working days of the verification, calculated from the final day of verification
- 7. Informing facility that there will be no Corrective Action Plans or improvement plans provided by the Verifier, as this is out of the scope of SLCP
- 8. Mentioning two-day grace period (if applicable and exceptional circumstance is met); facility can still provide more information to the Verifier to substantiate assessment information or clear up any issues with the Verifier that resulted from the onsite verification
- 9. Dispute process
- 10. If applicable, VB/Verifier sharing of facility verified assessment data with users other than the facility.





# 7. Appendix II: Sample Verification Plan

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

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

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

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

### 7.1. Verification Plan Sample for Virtual + Onsite Verification

### **Rabat Apparel: SLCP Verification Plan**

Verified Facility:	Rabat Apparel	Job No.:	000001
Facility address:	123 Morocco Enclave, Rabat, Morocco 10000	Assessment ID:	PRJ000001
No of employees:	498	Verifier(s):	[Name]
Step completed	3	Person-days virtual:	1.5
Verification Start Date:	2021-03-01	Person-days onsite:	2
Verification End Date:	2021-03-02	Total Person-days:	3.5

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

Duration	Team A: [Name]	Team B: [Name]	
09:00 - 10:00	Virtual pre-verification meeting with [Name] (HR Manager)		
	<ul> <li>Testing video conferencing software including in production areas</li> </ul>		
	<ul> <li>Explanation to facility management on virt</li> </ul>	ual verification methodology	
	<ul> <li>Question and answer period</li> </ul>		
	Opening Meeting with		
	1) [Name] (HR Manager)		
10:00 – 10:15	2) [Name] (Facility Manager)		
	3) [Name] (OSH Manager)		
4) [Name] (Trade Union Representative Representative)		orker Engagement Committee/ Worker	





10:15 – 11:00	Verification Team Internal Meeting + documents review of soft copies provided:		
	<ul> <li>Policies and procedures as attached by facility in Mgt System section</li> </ul>		
	<ul> <li>Occupational health and safety certificates &amp; operation records</li> </ul>		
	<ul> <li>Production and quality records</li> </ul>		
	Employee handbook & Facility rules		
	<ul><li>Production and quality records</li></ul>		
	– Emergency Response Plan		
	<ul><li>Evacuation procedures</li></ul>		
	<ul> <li>Complaints/ dispute resolutions procedures</li> </ul>		
	Virtual Management interview with [Name] (Facility Manager)  - Follow up questions re: documentation	Virtual walkthrough (refer to facility map) with [Name] (OSH Manager)	
11:00 - 12:30	reviewed	<ul><li>Areas listed in map as:</li></ul>	
	Virtual document review with [Name] (HR Manager)	Workshop, Warehouse, Production	
	<ul><li>Training records</li></ul>		
12:30 – 13:30	Lunch Break + Verification Team Internal Meeting		
	Virtual document review with [Name] (HR Manager)		
13:30 - 17:00	<ul> <li>"Real time" review of wage and hours records</li> <li>(8 x set of 3 = 24)</li> </ul>		
17:00 – 17:30	Wrap up meeting with Management Representative		

# 2021-03-02: Day 2 Onsite

Duration	Team A: [Name]	Team B: [Name]
09:00 – 10:45	Onsite documents review:  - Business license - Operational permits and certificates - Machinery and equipment maintenance records - Verification of presence of hardcopy documents matching soft copy documents used for virtual verification	Onsite worker individual interviews:  - Individual worker interviews (15 in total)  - Full time (3 female/ 4 male)  - Part time (3 female/ 5 male)  1 returning from maternity leave  1 pregnant  2 new hires  1 under probation
10:45–12:00	Onsite worker records review:  - Personnel files (30)  - Accident incident records  - Complaints/ dispute resolutions reports	
12:00 - 13:00	Lunch Break + Verification Team Internal Meeting	
13:30 – 16:00	Onsite worker records review:  - Wage and hours records review 19 x 3 (57)	Onsite worker interviews (group interviews):  - 15 total, 3 groups of 5  - Domestic migrant (3 female/ 3 male)  - Foreign migrant (all Indonesian) (3





	NOTE: SLCP recommends that if virtual wage/ hours records review took place, the subsequent onsite wage/ hours records review corresponds 100% to workers interviewed onsite.  The Verifier is still permitted to interview workers onsite whose records were reviewed virtually. But to ensure the integrity of the verification process, the identity of the majority of the interviewees will still be unknown until the Verifier selects the workers onsite.	
16:00 – 17:00	Pre-closing Meeting  - Verifier completes all "Inaccurate", "Non-Compliance" and "Updated during Verification" items to create the Verification Summary and prepare for meeting  - Final conversation with [Name] (Trade Union Representative)	
17:00 – 17:30	Closing Meeting with  1) [Name] (HR Manager)  2) [Name] (Facility Manager)  3) [Name] (OSH Manager)  4) [Name] (Trade Union Representative)	

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



# 7.2. Verification Plan Sample for Full Virtual Verification

# **Rabat Apparel: SLCP Verification Plan**

Verified Facility: Rabat Apparel Job No.: 000001 Facility address: 123 Morocco Enclave, Assessment ID: PRJ000001 Rabat, Morocco 10000 No of employees: 498 Verifier(s): [Name(s)] 3 Step completed Person-days virtual: 1.5 2 Verification Start Date: 2021-03-01 Person-days onsite: Total Person-days: Verification End Date: 3.5 2021-03-02

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

Duration	Team A: [Name] Team B: [Name]		
09:00 – 10:30	Virtual pre-verification meeting with [Name] (HR Manager)		
	Testing video conferencing software including in production areas		
	Explanation to facility management on virtual verification methodology		
	<ul> <li>Discussing privacy and confidentiality issues</li> </ul>		
	<ul> <li>Asking permission to take screenshots for attachments</li> </ul>		
	<ul> <li>Confirming designated camera person is onsite and available</li> </ul>		
	<ul> <li>Confirmation of operational processes and workforce capacity</li> </ul>		
	<ul> <li>Question and answer period</li> </ul>		
	Opening Meeting with		
	1) [Name] (HR Manager)		
10:30 - 11:00	2) [Name] (Facility Manager)		
	3) [Name] (OSH Manager)		
	4) [Name] (Trade Union Representative/ Worker Engagement Committee/ Worker Representative)		
	Verification Team Internal Meeting + documents review of soft copies provided:		
	<ul> <li>Policies and procedures present onsite</li> </ul>		
	<ul> <li>Occupational health and safety certificates &amp; operation records</li> </ul>		
	<ul> <li>Production and quality records</li> </ul>		
	Employee handbook & Facility rules		
11:00 – 12:30	<ul> <li>Production and quality records</li> </ul>		
	Emergency Response Plan		
	<ul> <li>Evacuation procedures</li> </ul>		
	<ul> <li>Complaints/ dispute resolutions procedures</li> </ul>		
	<ul> <li>WE Tech summary report</li> </ul>		
	<ul> <li>Verified assessment report data from immediately preceding verification</li> </ul>		
12:30 – 13:30	Lunch Break + Verification Team Internal Meeting		
13:30 - 14:30	Documents review of soft copies (continued)		
14:30 - 17:00	Virtual Management interview with [Name] (Facility Manager)		



	Follow up questions re: documentation reviewed	
	Virtual document review with [Name] (HR Manager)	
	Training records	
17:00 – 17:30	Wrap up meeting with Management Representative	

# 2021-03-02: Day 2 Virtual

Duration	Team A: [Name]	Team B: [Name]
09:00 – 11:30	Virtual document review with [Name] (HR Manager)  "Real time" review of wage and hours records (8 x set of 3 = 24)	
11:30 – 12:30	Virtual walkthrough (refer to facility map) with [Name] (OSH Manager)  Areas listed in map as: Workshop, Warehouse, Production  - Business license  - Operational permits and certificates  - Machinery and equipment maintenance records  Verification of presence of hardcopy documents matching soft copy documents used for virtual verification	
12:30 – 13:30	Lunch Break + Verification Team Internal Meeting	
13:30 – 15:30	Virtual walkthrough (continued)	
15:30 – 16:30	Pre-closing Meeting  - Verifier completes all "Inaccurate", "Non-Compliance" and "Updated during Verification" items to create the Verification Summary and prepare for meeting  - Final conversation with [Name] (Trade Union Representative/ Worker Engagement Committee/ Worker Representative)	
16:30 – 17:00	Closing Meeting with  1) [Name] (HR Manager)  2) [Name] (Facility Manager)  3) [Name] (OSH Manager)  4) [Name] (Trade Union Representative)	

Note: The above scheduled activities may be adjusted per actual situation. For Full Virtual Verification the Verifier MUST allow for flexibility in planning to account for technical issues.

