

# Social & Labor Convergence Program

Quality Assurance Manual -  
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## Introduction

This SLCP Quality Assurance (QA) Manual describes the QA activities that are executed by the SLCP Verification Oversight Organization (VOO) to ensure quality and integrity of the SLCP assessment and verification process and the verified data resulting from that process. This document includes a description of the goals and expected outcomes of QA processes and the specific procedures that define how QA is implemented. An additional resource that is relevant in the given context is the Converged Assessment Framework (CAF), and particularly the Verification Protocol. This document as well as the other elements of the CAF can be found on our [Helpdesk](#).

### Goals of Quality Assurance (QA)

The purpose of Quality Assurance is to provide high level oversight of the SLCP verification process, and to evaluate if the verification process is producing consistent and accurate outcomes<sup>1</sup>. QA activities planned for 2019 build on the learnings from 2018 Light Operation. A wide mix of QA activities will be undertaken, with the goal of determining which QA activities are most effective and should be used in 2020 and beyond, when SLCP goes global.

### 2019 QA Activities

QA activities are designed to ensure a qualified pool of SLCP approved Verifiers is available to SLCP system users, and to ensure quality and integrity during the SLCP verification process. There are ten types of QA activities in 2019:

- A. Vetting and testing applicant Verifiers and Verifier Bodies (VBs)
- B. Assessing Verifier Bodies' internal management systems
- C. Desktop Reviews
- D. Counter Verifications
- E. Duplicate Verifications
- F. Shadow Verifications
- G. Feedback from SLCP system users
- H. Disputes
- I. Complaints
- J. Verifier Scoring

SLCP determines the coverage (exact # to conduct) for each QA activity, considering the cost and value of each activity. In determining how many of each activity to conduct, SLCP makes sure that QA ensures the quality of the SLCP verification process and generating insights for overall system improvements. In 2019, the VOO will conduct at minimum:

- 25 application audits
- 10 Verifier Body assessments
- 100 Desktop Reviews
- 20 on-site QA activities (Counter Verification, Shadow Verifications, Duplicate Verifications)
- Review of all feedback from system users
- Review of all complaints and disputes
- Scoring of all Verifiers

For more details on sampling, please contact the SLCP Secretariat.

<sup>1</sup> Note that QA is NOT focused on the accuracy of specific assessments

**Reading guide**

In the QA overview (section 1) all QA activities are described, in section 2 the specific procedures are outlined for each activity.

**1. Quality Assurance (QA) Activity Overview**

QA activity	Why	What
<b>Vetting and testing of applicant Verifiers and Verifier Bodies</b>	Through vetting and testing of applicant Verifiers and VBs, the VOO ensures that Verifiers and VBs meet requirements regarding their professional experience, auditing skills and knowledge of SLCP procedures and protocol.	<ul style="list-style-type: none"> <li>Assessing of candidate VBs and Verifiers against SLCP criteria (regarding their experience conducting social audits, knowledge of legal requirements and international standards and education) for the countries where they propose to operate</li> <li>Mandatory taking of e-learning training course on SLCP system and processes</li> <li>Exam to test candidate Verifiers on social and technical skills, and their knowledge of SLCP procedures and protocol</li> </ul>
<b>Assessment of VBs management systems</b>	As it is the responsibility of VBs to ensure that Verifiers have the skills and experience required to perform SLCP verifications, these assessments help ensure that VBs have the management system in place to ensure quality and integrity of their Verifiers	An assessment of the policies and procedure VBs have in place to ensure their SLCP approved Verifiers' competency
<b>Desktop Review</b>	Desktop Reviews are an effective method of ensuring that Verifiers are completing verified assessment reports correctly and that data in reports is accurate. They are also used to identify aspects of the SLCP system that are not well understood by Verifiers.	<p>A Desktop Review is a remote assessment of a verified assessment report. A Desktop Review assesses report content, with a focus on instances where the Verifier has provided a corrected response.</p> <ul style="list-style-type: none"> <li>A Desktop Review identifies any issues in the report, including:             <ul style="list-style-type: none"> <li>Facility responses that were not verified</li> <li>Corrected responses that are inaccurate</li> <li>Instances where a facility provides inconsistent information that is not corrected by the Verifier</li> <li>Any instances where it appears that the question was misunderstood by the Verifier, causing the "Corrected Response" to be misleading</li> <li>Misapplication or misinterpretation of local laws</li> </ul> </li> <li>Desktop Reviews check for any issues that could cause the report to be invalidated</li> </ul>

		<p>Desktop Reviews assess the verification procedure by capturing instances where the verification procedure was not followed including:</p> <ul style="list-style-type: none"> <li>○ Tool uploaded more than ten days after the assessment</li> <li>○ Number of days spent on site is less that SLCP requirements and recommendations</li> </ul>
<b>Counter Verification</b>	<p>Counter Verifications provide insight into whether the SLCP verification process is producing accurate and reliable data</p>	<p>Counter Verifications are 1-day visits to facilities that were recently visited for an SLCP verification. Counter Verifications assess if verification procedures were followed, if Verifiers had the skills and knowledge to conduct the verification and if report content is accurate.</p> <p>Counter Verifications are not a duplication of the initial verification, rather a high-level verification including a sample of all sections of the Data Collection Tool.</p>
<b>Duplicate Verification</b>	<p>By repeating an entire assessment at a different point in time, Duplicate Verifications assess if verification procedures were followed, if Verifiers had the skills and knowledge to conduct the Verification and if report content is accurate</p>	<p>Duplicate Verifications are a repeat of an SLCP verification, performed by a different VB or the VOO, approximately 4-8 weeks after the initial verification. Similar to Counter Verifications, Duplicate Verifications employ the same methods of verifying information used in Verifications (e.g. worker interviews, document reviews). Differences are analyzed and a determination of the reasons for discrepancy is made. The determination of why there are discrepancies is essential to determining if verification procedures were followed, if Verifier conduct was in line with SLCP procedures, etc.</p>
<b>Shadow Verification</b>	<p>Shadow Verifications are used to assess Verifier quality and identify areas where Verification Protocol are not clear or not well understood by auditors.</p>	<p>Shadow Verifications are when the VOO or designated representative observes a verification to ensure that the Verifier follows Verification Protocol. Through direct observation, the VOO can confirm if Verifiers are following SLCP requirements when conducting a verification. During a Shadow Verification, the VOO does not actively participate in the assessment.</p>
<b>Feedback from SLCP system users</b>	<p>Feedback is collected from SLCP system users to assess the functioning of verification in general, and Verifiers and VBs in particular</p>	<p>Feedback will come from:</p> <ol style="list-style-type: none"> <li>1. Feedback forms that are to be filled in by a facility and Verifier after every verification;</li> <li>2. SLCP system users' questions regarding verification that come in through Zendesk (SLCP Helpdesk);</li> <li>3. Feedback from brands on reports</li> </ol>
<b>Disputes</b>	<p>Disputes allow facilities to formally raise concerns over the quality of a verification and for the VOO to determine if this resulted in an impact to the accuracy of the verified assessment report.</p>	<p>On the Accredited Host platform, a facility raises a dispute if a Verifier did not follow Verification Protocol or other SLCP requirements were not met. The VOO determines if the dispute is valid and if the verified assessment report needs to be amended.</p> <p>Disputes are not used to resolve question level issues.</p>

<b>Complaints</b>	Complaints allow SLCP system users to raise an issue regarding the SLCP assessment and verification process	Through our Helpdesk any system user can leave a complaint. The VOO will look into all complaints related to the assessment and verification process. This can lead to changes to the SLCP process and system.
<b>Verifier Scoring</b>	Through Verifier scoring, the VOO can identify trends associated with positive Verifier performance and determine if there are poor performing Verifiers that need to be removed from the system. Verifier scoring can also be used to incentivize timeliness and professionalism.	QA activities result in data regarding Verifier performance. Verifier scoring uses this data to rate Verifiers on all their overall quality. Data from application, testing, Desktop Reviews, on-site reviews (Counter Verifications, Duplicate Verifications, Shadow Verifications) and feedback surveys all feed into Verifier scoring.

**Quality Assurance outcomes**

The QA activities that the VOO executes are selected to work together systemically to ensure quality, identify issues and improve the SLCP process and system as a whole.

QA methodologies such as Desktop Reviews, Counter Verifications, Shadow Verifications and Duplicate Verification are designed to detect issues with the verification process. The VOO uses a dashboard to monitor QA activities, including the specific issues that are identified during each instance of QA. On an ongoing basis, the VOO reviews and analyzes these issues. The outcome of this analysis is a determination if the issues detected during QA are systemic problems with the verification process (e.g. Verification Protocol does not address a topic), issues with a particular VB or region (e.g. local laws being interpreted incorrectly) or are issues isolated to a particular Verifier. In order to address systemic issues, the VOO recommends revisions to the CAF, SLCP training, Verifier qualifications, etc. Regional issues, or VB specific issues may be addressed through technical bulletins to Verifiers, or direct follow-up with VBs. In this way, QA helps to ensure that problems with the verification process are not only detected but fixed in a systemic way.

If a specific QA activity indicates poor performance, or other issues with the verification process it can also trigger additional QA. For example, if a Desktop Review shows that a Verifier has not gathered sufficient evidence, this may trigger additional activities, such as a Shadow Verification, where the Verifier is observed on site.

**Quality Assurance communications**

In addition to any reporting identified in the specific procedures below, the VOO consolidates the QA outcomes and provides visual summaries via an updated dashboard for review by the SLCP. For example, the dashboard may display a chart that shows the overall rating of quality of reports determined by Desktop Reviews by country or VB. The purpose of the dashboard is to provide real-time access to QA outcomes and results so that the SLCP can consider potential improvements to the system and plan appropriately.

## 2. Quality Assurance (QA) Procedures

### A. Verifier Body and Verifier Selection

The Verifier Body and Verifier selection process ensures that Verifiers have the skills, knowledge and experience required to conduct consistent and reliable SLCP verifications. This procedure defines how the Verification Oversight Organization (VOO) selects and approves VBs and Verifiers.

#### Procedure

##### 1. Verifier Body Application

- 1.1 All Verifiers must be employed by an approved Verifier Body.
- 1.2 To become an approved Verifier Body, candidate VBs use an online application to provide information on their experience conducting social audits, their policies and procedures on Verifier competency, their policies and procedures on ethics and anti-corruption. The application can be started [here](#).
- 1.3 The table below summarizes the requirements that candidate VBs must meet:

Criteria	Specifics
Organization type and experience	2 <sup>nd</sup> party or 3 <sup>rd</sup> party SLCP signatory with minimum 3 years' track record in auditing of social and labor conditions in textile, apparel or footwear facilities
Geographical location	Experience with social and labor auditing in SLCP roll-out country
Internal Management System	Management system to ensure the competency of Verifiers, including policies and procedures on competence, training and internal quality assurance
Internal management system: Commitment to Developing SLCP Specific Policies	<p>In addition to having general policies on competency, VBs must commit to developing SLCP-specific policies.</p> <ul style="list-style-type: none"> <li>• Commitment to develop and enforce written policies and procedures on SLCP competence</li> <li>• Commitment to develop and enforce written policies and procedures on training SLCP approved Verifiers</li> <li>• Commitment to develop and enforce written policies and procedures on internal quality including rule to conduct an internal quality review of each verification before it is finalized</li> <li>• Commitment to develop and enforce written policies and procedures on calibration</li> <li>• Commitment to require / provide documented integrity / ethics training to Verifiers on a regular basis.</li> </ul>

- 1.4 Verifier Bodies that are approved may put candidate Verifiers through the application process (see Step 2 below).
- 1.5 All approved VBs are subject to review to ensure that VBs uphold their commitments to develop policies and procedures on SLCP approved Verifier competence, training and internal quality management (See [B. Verifier Body Assessments](#)).

##### 2. Verifier Application process

- 2.1 Using an online application, candidate Verifiers provide information regarding their skills, knowledge and experience.
- 2.2 The table below summarizes requirements candidate Verifiers must meet:

Criteria	Specifics
Work experience	Minimum of 3 years of conducting social and labor type of on-site audits/verifications, with robust proof of relevant experience (e.g. number of audit days etc.)
Education/qualification	Post-Secondary Degree / Diploma Required: Training on at least one social auditing system, e.g. SA8000, BSCI, WRAP, RBA or ICTI Recommended: > Training on at least one management systems auditing standard: ISO 9001, ISO 14001, OHSAS 18001/ISO 45001 > Experience in conducting management systems audits > APSCA registration/certification > Other relevant social scheme Auditor (e.g. Lead) approval / accreditation > Company internal social auditor trainings
Knowledge areas	Thorough understanding of social and labor type of on-site verification processes, including project planning, communication, ethics Excellent command of English and local language(s) in roll out country Knowledge of international and local norms, laws and regulations relating to social and labor issues, e.g. local law, ILO conventions Knowledge of core management system requirements

2.3 On-site social auditing experience is defined as experience at facilities assessing social and labor conditions. This experience can include conducting 2<sup>nd</sup> and 3<sup>rd</sup> party audits as well as internal auditing experience. For example, conducting internal social audits as a compliance officer at a facility can count toward this qualification.

2.3.1 For the purposes of the criteria, internal auditing can be included in the 3-year minimum if the following criteria are met:

- Internal auditing experience must be directly related to social/labor compliance where the scope includes hiring practices, working conditions, fair wages, health and safety, management systems (experience in other compliance such as CTPAT is not relevant).
- The 3 years is not wholly based on internal auditing (i.e. at least some of the experience must include external auditing/verifications).
- The overall education and experience of the candidate indicates knowledge of social auditing systems and methods.

### 3. Selection process

3.1 Candidate Verifiers who meet the criteria take the required SLCP training. Training is delivered online and consists of seven modules: <http://training.slconvergence.org>.

- 3.2 Once candidates complete the Verifier Course on the training platform, they must take an online proctored exam.
- 3.3 Only Verifiers who have completed all seven modules and passed the exam are considered qualified.

#### **4. Eligibility Equivalence Review**

- 4.1 If a Verifier candidate is initially determined to be ineligible but they think their combination of education, experience, and training meets the intent of the SLCP criteria and they wish to provide an explanation for why the SAC should except this as a demonstration of their ability to conduct a high quality verifications, they can complete an 'Eligibility Equivalence Review Request Form'.
- 4.2 Candidates have up to 30 days to request a review by completing the form that is provided by the VOO in the application process.
- 4.3 Requests are reviewed by a panel
  - 4.3.1 Panel makeup
    - 4.3.1.1 VOO Member
    - 4.3.1.2 SLCP Secretariat Member
    - 4.3.1.3 Expert Member (typically from an organization that deals with social auditing competency such as APSCA)
- 4.4 The purpose of the panel is to review the overall qualifications of the individual to make a professional judgement if the sum of those qualifications meets the overall intent of the criteria and therefore an 'equivalence/exception' is granted on a case by case basis.
- 4.5 Each panel member votes whether to 'Approve' or 'Not Approve'. A simple majority indicates the final result.
- 4.6 Requests are reviewed by a panel within approximately 1-2 weeks
- 4.7 If equivalence is approved, the eligibility finding is changed in the original application and candidate is notified via email.

#### **5. Maintaining Verifier status**

- 5.1 Status as an SLCP approved Verifier is transferrable only between approved Verifier Bodies.

#### **6. Verifier Application Audits**

##### **6.1 Application Selection and Requesting Information**

- 6.1.1 The VOO audits Verifier applications to ensure the accuracy of self-reported data.
- 6.1.2 Applications are selected randomly and based on risk.
- 6.1.3 Applications may be audited at any stage of the application and approval process.
- 6.1.4 The VOO emails the applicant and requests additional information and documentation to support self-reported data in their application.
- 6.1.5 Applicants that are selected for an audit have at least 14 calendar days to provide the requested information.

##### **6.2 Review of Application Criteria**

- 6.2.1 The audit focuses on self-reported data. Applicants are not required to provide information that was included in the initial application.
- 6.2.2 Based on the information in the application, the VOO asks for evidence to support the self-reported data in the Verifier application. This may include redacted audit reports, training certificates or other information.

##### **6.3 Review**

- 6.3.1 The VOO completes the audit within 14 days of receiving information from the applicant.

- 6.3.2 Additional information may be sought from the applicant based on their responses.
- 6.3.3 If the applicant provides incorrect data/evidence, they have one additional chance to provide correct data/evidence.
- 6.3.4 After performing the audit, the VOO determines if the self-reported data provided by the applicant is accurate.

#### **6.4 Audit outcomes**

- 6.4.1 If the self-reported data is generally accurate, no further action is needed.
  - 6.4.1.1 Minor issues include honest mistakes in entering numbers/data, entering incorrect data due to misunderstanding of question.
- 6.4.2 If the self-reported data is not accurate, the VOO determines what impact the inaccurate data has on the applicant's application.
  - 6.4.2.1 If the inaccurate data would have resulted in the applicant failing the initial application, they are suspended.
    - 6.4.2.1.1 The applicant may formally appeal the suspension. The appeal will be reviewed by the VOO and the SLCP Secretariat. The appeal decision is final.
    - 6.4.2.1.2 The applicant may apply to be re-instated after 12 months.
    - 6.4.2.1.3 The application will need approval of the VOO as well as the SLCP Secretariat.
  - 6.4.2.2 If the inaccurate data would not have impacted their initial application, the Verifier Body is required to provide an explanation and corrective action plan to demonstrate how they will ensure the accuracy of future applications. If the inaccurate data is provided intentionally and is deliberately misleading, the Verifier may be suspended.
- 6.4.3 Applicants are informed of audit outcomes.

#### **6.5 Process Flowchart**

The chart in Appendix I illustrates the application process, including Verifier Body Application and Verifier Application

#### **Responsibilities**

- **VOO:** Review applications and apply scoring; determine eligibility based on application score; administer exam.
- **SLCP:** Approve criteria, scoring design, and exam questions/ design.

### **B. Verifier Body Assessment**

Verifier Body Assessments review the policies and procedures VBs have in place to ensure the quality of SLCP verifications conducted by their Verifiers. This procedure defines how the Verification Oversight Organization (VOO) conducts Verifier Body assessments.

#### **Procedure**

##### **1. Selecting VBs for assessment**

- 1.1. A selected number of VBs will be assessed. Both 2<sup>nd</sup> and 3<sup>rd</sup> party VBs are assessed.
- 1.2. VBs are selected jointly by the VOO and SLCP based on criteria including the number of verifications conducted, number of Verifiers participating in operations and number of countries of operation.

## 2. Assessing Verifier Bodies

- 2.1. The scope of the assessment is the VB's SLCP program.
- 2.2. The assessment ensures that VBs have upheld their commitment to developing SLCP-specific policies and procedures.
- 2.3. The VOO assesses:
  - The VBs policies and procedures on Verifier competence
  - The VBs policies and procedures on training for Verifiers
  - The VBs policies and procedures on internal quality, including report review
  - The VBs practices for calibrating Verifiers to ensure consistency, both within the VB and with external requirements
  - The VBs practices for ensuring Verifiers act ethically
- 2.4. Assessments are conducted remotely. The VOO requests documentation from the VB and may schedule teleconference meetings to review material with VB management. Once the VOO requests documentation, VBs have 14 days to submit the requested documentation to the VOO.

## 3. Reporting

- 3.1. The outcomes of VB assessments are recorded in a standard report form.
- 3.2. Outcomes of VB assessments are shared with VBs so they can take steps to address gaps in their SLCP programs.

## 4. Corrective Action

- 4.1. If the VOO finds significant gaps in the VB's SLCP Program, the VB will be required to take corrective action to address those gaps.
- 4.2. VBs that do not take corrective action may be subject to disqualification.

### **Responsibilities**

- **VOO:** Select VBs for assessment in coordination with SLCP; ensure this procedure is consistently followed; qualify staff as VB Assessors.
- **VOO VB Assessor:** Conduct VB Assessment in line with this procedure and generate report.
- **SLCP:** Select VBs for assessment in coordination with VOO.
- **VBs:** Provide information and documentation, as requested by the VOO.

## **C. Desktop Review**

Desktop Reviews are remote assessments of verified assessment reports. This procedure defines how Desktop Reviews are conducted to ensure that they are the result of a high quality, reliable and consistent verification process.

### **Procedure**

#### 1. Report Selection

- 1.1. Reports are selected based on risk, through stratified random sampling and simple random sampling. Approximately one-third of Desktop Reviews will be selected using stratified random sampling, one-third selected based on risk and one-third using simple random sampling. The strata for stratified sampling will include: country and Verifier Body. Note that these ratios may be adjusted.
- 1.2. The risk factors for selecting reports for review (also known as "QA flags") are listed in Appendix II. Reports that meet these conditions are flagged in the Gateway for the VOO to review.
- 1.3. Reports are selected for Desktop Review within 10 business days of report upload to the AH.

- 1.4. Depending on how many reports are flagged, not every flagged report may be reviewed.

## **2. Report Review**

- 2.1. Each question, including the Facility Response, Verification Selection, Corrected Response and Verification Data is reviewed.
- 2.2. The review identifies inaccuracies and errors in the report. This includes questions that have not been verified properly; instances where Verification Protocol was not followed; technology issues with the Tool and/or platforms.
- 2.3. The VOO may contact the Verifier for clarifications.
- 2.4. In exceptional circumstances, the VOO may allow Verifiers to make corrections to a report. This includes when there are technical issues or if a report has been uploaded accidentally before the verified assessment report is complete.
  - 2.4.1. When allowing Verifiers to make corrections to a report, the VOO sets the status of the report from VRF to VRC on the Gateway. Before setting the status of the report to VRC, the VOO also checks if the facility has any other assessments in progress (ASI, ASC, VRP, VRC, VRD). If there are assessments in progress, the VOO must first contact the facility to ensure the correct assessment is being modified and put back into the system before setting the status to VRC, as only one active assessment is permitted at any point in time in the SLCP system.
  - 2.4.2. Within 5 days the Verifier must make corrections and the facility must review the report before the report status is automatically set back to VRF.

## **3. Analyzing Inaccuracies and Errors**

- 3.1. Any inaccuracies and errors (as defined above) are analyzed as part of the Desktop Review.
- 3.2. Inaccuracies and errors are categorized in order to summarize and report on the types of inaccuracies and errors that are most common and most critical.

## **4. Reporting**

- 4.1. Desktop Review outcomes are recorded in a standard report format.
- 4.2. Desktop Review reports are completed within 10 working days of selection of the report review.
- 4.3. Information regarding Verifier performance is included in the Verifier scorecard.
- 4.4. The VOO provides SLCP with a real-time summary of issues identified through Desktop Reviews.
- 4.5. Individual Desktop Review reports are not provided to VBs. VOO aggregates information on common mistakes and misunderstandings and issues a quarterly technical bulletin to all VBs so they are informed of common mistakes and critical issues. The VOO may follow up directly with individual VBs if Desktop Review shows their Verifiers do not understand the Verification Protocol and the VB needs to take specific action to improve their reports.

## **5. Invalidating Reports**

- 5.1. If the Desktop Review finds any of the issues listed in Appendix III, Extreme Cases, the VOO may invalidate the verified assessment report.
- 5.2. If VOO determines a report must be invalidated, the VOO informs VBs and the facility.
  - 5.2.1. The VOO emails the facility and the VB informs that the report will be invalidated. A short explanation of why the report is being invalidated is provided.
  - 5.2.2. Four calendar days after the facility and VB are informed, the VOO sets the report status to VRI on the Gateway.

- 5.3. Instances where reports are invalidated due to errors or oversights by the Verifier will be captured in the Verifier scorecard. If a verification is invalidated due to bribery or to significant issues with Verifier performance, the VOO may suspend the Verifier from conducting further verifications. Decisions to suspend Verifiers will be made jointly by the VOO and SLCP.

#### **Responsibilities**

- **VOO:** Ensure this procedure is consistently followed; selecting reports for review, qualify staff as report reviewers, creating and sending of aggregated evaluation reports, add QA data to Verifier scorecard.
- **SLCP:** Make suspension decisions, jointly with VOO

### **D. Counter Verification**

Counter Verifications are high level 1-day visits to a facility that recently hosted a verification. They are used to assess if SLCP verification procedures are being followed, if Verifiers have the skills and knowledge to conduct verifications and if verified assessment report content is generally accurate.

Counter Verifications employ the same methods of verifying information used in verifications (worker interviews, document reviews, etc.) as well as discrete interviews with management to gather information about the conduct of the initial verification. The accuracy and reliability of verified data is assessed by comparing the initial verification outcomes to the Counter Verification outcomes.

This procedure defines how the Verification Oversight Organization (VOO) conducts Counter Verifications so that they produce consistent and reliable feedback on the verification process.

#### **Procedure**

##### **1. Counter Verifier Selection**

- 1.1. Counter Verifications are performed by qualified Counter Verifiers.
- 1.2. Counter Verifiers may work for either the VOO or a VB.
- 1.3. Counter Verifications are performed by VBs and not by the VOO in countries where the VOO is not active.
  - 1.3.1. All approved Verifiers are eligible to be qualified as Counter Verifiers
  - 1.3.2. To be considered qualified a Counter Verifier must
    - Meet the requirements for being a Verifier
    - Have a minimum of 2 years' experience conducting quality assurance such as report reviews or internal audits.
    - Complete Counter Verifier training
  - 1.3.3. The VOO provides Counter Verifier training.
    - 1.3.3.1. Counter Verifier training includes approximately 3 hours of general training and individualized training and knowledge checks.
    - 1.3.3.2. The cost for Counter Verifier training is \$500 USD per VB. This cost covers all Verifiers the VBs wishes to have trained.
  - 1.3.4. To avoid conflicts of interested and ensure integrity when Counter Verifications are performed by VBs, the VOO takes the following measures:
    - Reviewing each Counter Verification to confirm that the Counter Verifier assessed the facility objectively.

- The name of the VB who performed the initial verification is not provided and is removed from reports and preparation materials.
  - Any determinations about Verifier performance during the initial Verification (see section 6) are made by the VOO not the VB.
  - Ensuring and communicating that all VBs are subject to Counter Verifications and other on-site QA activity.
  - If the Counter Verification indicates poor Verifier performance, this is cross checked with additional QA activities.
- 1.4. The VOO selects the Counter Verifier for each Counter Verification based on factors including availability, experience and cost.
- 1.5. A Counter Verifier may not work for the VB that conducted the initial verification.
- 1.6. Due to the limited number of Counter Verifications being conducted in 2019, the VOO will recruit Counter Verifiers from VBs, on an as-needed basis.
- 2. Counter Verification Facility Selection**
- 2.1. All facilities where verifications have taken place are subject to Counter Verification.
- 2.2. Selection of facilities for Counter Verification is done jointly by the VOO and SLCP.
- 2.3. Facilities will be chosen based on several criteria including risk factors, size, facility type and geographic location. Risk factors include (but are not limited to) indications of corruption, verified assessment reports with an accuracy rate higher than 95%, suspected or known Verifier performance issues, and verifications associated with disputes or complaints.
- 2.4. The VOO contacts facilities to inform them of the Counter Verification.
- 2.5. Counter Verifications are announced. The VOO works with the facility and Counter Verifier to find a suitable date for the Counter Verification.
- 2.6. There are no costs to facilities for Counter Verifications.
- 3. Counter Verification Preparation**
- 3.1. Prior to the Counter Verification, the Counter Verifier reviews the verified assessment report, the Verifier score (in the qualifying exam) and if available the VB assessment outcome and/or information from the dispute mechanism and/or complaints system. This allows the Counter Verifier to review any inconsistencies and determine which questions to sample while on site. If the Counter Verification is conducted by a VB, the VOO makes this information available to the VB/Counter Verifier at least two weeks prior to the Counter Verification.
- 3.2. A Counter Verification agenda is sent to the facility at least one week prior to the Counter Verification.
- 4. Counter Verification Methodology**
- 4.1. Counter Verifications take up one working day.
- 4.2. Counter Verifications consist of three main activities:
- Management interviews to assess Verifier conduct and verification procedure during the initial verification.
  - Review of assessment questions, facility responses and verification data. This activity will include worker interviews, facility walk through, document review and other activities that are part of a standard verification.
  - Analyzing differences in initial verification results and Counter Verification results and further investigation to uncover reasons for inconsistencies.

- 4.3. These activities are conducted to assess the SLCP verification process and determine if the Verification Protocol is followed; if Verifiers have appropriate skills and knowledge and if verified assessment reports are accurate and reliable. These activities are not used to correct or adjust the outcomes of the initial verification. However, if the Counter Verification finds serious issues the initial verification may be invalidated.

## **5. Counter Verification Process**

### **5.1. Management Interviews**

- 5.1.1. There are two types of management interviews conducted during Counter Verifications, each serving a different purpose. The first type of management interview is to assess Verifier conduct and verification procedure during the initial verification. This is an activity that is unique to Counter Verifications and the purpose of this activity is to get input from facility management on the SLCP process. The second type of management interview is to assess report content. This activity is similar to management interviews that take place during regular verification and the purpose of this activity is to assess if the facility has accurately answered questions.
- 5.1.2. To assess Verifier conduct and verification procedure, a pre-defined set of questions is used to guide the management interview. Questions are formulated to cross-check information coming from other QA activities and to gather additional information.
- 5.1.3. Counter Verifiers should spend no more than 1 hour conducting management interviews to assess Verifier conduct and verification procedures.
- 5.1.4. Management interviews to assess the facility responses and corrected responses to questions in the SLCP tool follow the same procedure as during the initial verification.

### **5.2. Reviewing assessment questions, facility responses and verification data**

- 5.2.1. The purpose of assessing facility responses and verification data is to evaluate if the Verifier(s) marked questions correctly during the initial assessment. If this is not the case an investigation starts into Verifier quality and conduct (including an investigation into bribery).
- 5.2.2. Report content is assessed by reviewing a sample of facility responses and verification data, including corrected responses. The sample assesses 2-3 questions from each section in the tool.
- 5.2.3. The questions WH-6; WB-3; HS-16; FL-12 and FOA-CB-1 will be assessed during each Counter Verification, to give points of comparison.
- 5.2.4. Prior to the Counter Verification, the Counter Verifier selects the questions that will be sampled. Depending on actual conditions on site, the questions assessed may be changed during the Counter Verification. The sample should include both questions where the response was corrected and questions where the response was not corrected.
- 5.2.5. For Counter Verifications where corruption is suspected, Counter Verifiers will select questions that are relevant to the issue being investigated. Counter Verifiers should be aware of areas where corruption (e.g. falsified records) are likely to be uncovered and focus on these questions.
- 5.2.6. Counter Verifiers use the same verification methodologies used during the initial verification and follow the Verification Protocol for conducting verifications. Document reviews, factory walk through, worker interviews and management interviews are all used to assess if information contained in the verified assessment report is accurate. Counter Verifiers follow the same practices that Verifiers do, including ensuring the confidentiality of worker interviews.
- 5.2.7. Counter Verifications note and analyze any differences between facility responses, verification selections, corrected responses and what is observed on site during the Counter Verification.

5.2.8. For the purposes of Counter Verifications, “observed on site” means any information obtained during a Counter Verification. This is not limited to visual observations but can include information obtained through worker or management interviews, document reviews, etc.

**5.3. Differences between initial verification results and Counter Verification results**

5.3.1. Differences between facility responses and what is observed on site and differences between verification selections/corrected responses and what is observed on site will be captured by Counter Verifiers.

5.3.2. Counter Verifiers will spend a portion of the Counter Verification determining the underlying reasons for the differences between what is contained in the verified assessment report and what is observed on site. To do this analysis, Counter Verifiers may conduct additional document review, worker interviews and/or management interviews.

5.3.3. If a Counter Verifier observes any differences between what was reported during the initial verification and the Counter Verification, they investigate fully to determine if the discrepancy is due to corruption or falsification of records. Counter Verifiers will capture as much information as possible on the underlying reasons for the discrepancies in the Counter Verification report.

**5.4. Submission of Counter Verification Data to the VOO**

5.4.1. If a Counter Verification is performed by a VB, the Counter Verifier submits a preliminary Counter Verification Report to the VOO, using a standard report template provided by the VOO.

5.4.2. The preliminary Counter Verification report includes data on what the Counter Verifier assessed on-site, highlighting any differences between the initial verification and the Counter Verification.

5.4.3. Preliminary Counter Verification reports are due to the VOO within 5 business days of the Counter Verification.

**6. VOO Analysis of differences between initial verification and Counter Verification**

6.1. The VOO analyzes any differences between the initial verification and the Counter Verification. This assessment forms the basis for the VOO’s determination of whether SLCP processes were followed and if the Verifier had the required skills and knowledge to conduct the initial verification.

6.2. Based on information provided by the Counter Verifier, the VOO categorizes any differences/discrepancies raised during the Counter Verification. The VOO assesses if the discrepancies were due to understandable point in time differences or due to systemic oversight or other issues with the initial verification.

6.3. The VOO may follow up with VB Counter Verifiers if additional clarifications are necessary.

**7. Final Counter Verification Report**

7.1. Counter Verifications reports are completed using a standard report template.

7.2. Final Counter Verification reports are completed within 10 business days of the Counter Verification.

7.3. Facilities receive a summary of the Counter Verification report that includes:

- Details on the Counter Verification (when it took place, the party that conducted it, etc.)
- A summary of any legal issues identified during the Counter Verification that were not identified during the initial verification
- If there were no significant issues, confirmation that the Counter Verification did not show any significant issues

7.4. Verifier Bodies receive a summary of the Counter Verification report that includes:

- Details on the Counter Verification (when it took place, the party that conducted it, etc.)
  - A summary of any legal issues identified during the Counter Verification that were missed by the Verifier (i.e. legal issues not identified during the initial verification and would have been present during the initial verification)
  - Summary of any other issues identified during the Counter Verification that were missed by the Verifier (i.e. issues that were clearly present during the initial verification and not captured in the report)
- 7.5. The Counter Verification may identify serious legal issues that are not a cause for invalidation (see section 8 below) of the report. For example, if a Counter Verification identifies a case of child labor but concludes that the child’s employment started after the initial verification took place, this is not a serious oversight by the Verifier and therefore not a cause for invalidation. In cases where the Counter Verification finds there are significant legal issues that are not causes for invalidation, users of the verified assessment report are informed of these legal issues.
- 7.5.1. In cases where there are significant legal issues that are not a cause for invalidation, the VOO completes a form that feeds into the SLCP verified assessment report template under “Assessment Information”. The VOO then informs all Accredited Hosts and the facility of this addition to the already final report. The Accredited Host(s) then inform the users of the verified assessment (those who have already received the report through the platform) that the assessment has been updated due to VOO activity. The facility is also encouraged to resubmit the Gateway report to parties they already shared the report with through the Gateway.

## **8. Invalidating Reports**

- 8.1. If the Counter Verification finds any of the issues listed in Appendix III, Extreme Cases, the VOO may invalidate the report.
- 8.1.1. The VOO emails the facility and the VB informs that the report will be invalidated. A short explanation of why the report is being invalidated is provided.
- 8.1.2. Four calendar days after the facility and VB are informed, the VOO sets the report status to VRI on the Gateway.
- 8.2. Instances where reports are invalidated due to errors or oversights by the Verifier will be reflected in the Verifier Scorecard. If a verification is invalidated due to bribery or to significant issues with Verifier performance, the VOO may suspend the Verifier from conducting additional verifications. Decisions to suspend Verifiers will be made jointly by the VOO and SLCP.

### **Responsibilities**

#### **Counter Verifiers:**

- Conduct Counter Verifications in line with this procedure and completing Counter Verification reports.

#### **VOO:**

- Recruit and qualify Counter Verifiers to conduct Counter Verifications;
- Ensure that this procedure is followed consistently;
- Conduct QA reviews of Counter Verification reports;
- Determine Counter Verification facilities, in cooperation with SLCP.
- Add Counter Verification outcome data to Verifier scorecard
- Make determinations on suspension of Verifiers, in cooperation with SLCP

#### **SLCP:**

- Approve updates and amendments to this procedure;

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- Determine Counter Verification facilities, in cooperation with the VOO.
- Make determinations on suspension of Verifiers, in cooperation with SLCP

**Brands and Facilities:**

- Support and facilitate scheduling of Counter Verifications.

### **E. Duplicate Verification**

Duplicate Verifications are a repeat of a verification, conducted within 2 months of the initial verification by a different VB or the VOO. They are used to assess if SLCP verification procedures are being followed, if Verifiers have the skills and knowledge to conduct verifications and if verified assessment report content is generally accurate.

When inconsistencies in data are found between the original and Duplicate Verification, the VOO investigates further to assess whether it is a competency issue (e.g. individual Verifier's knowledge and skills, SLCP training program), or a procedural issue (e.g. Verification Protocol quality, VB management procedures), or an ethical issue (e.g. bribery, corruption).

#### **Procedure**

##### **1. Duplicate Verifier Selection**

- 1.1. Duplicate Verifications are performed by qualified Verifiers or the VOO.
- 1.2. VOO staff that perform the Duplicate Verifications meet the requirements for being a qualified Verifier.
- 1.3. VBs shall not perform Duplicate Verifications if they performed the initial verification.
- 1.4. The VOO selects the Verifier Body based on factors including availability, experience and cost.
- 1.5. The VB selects the Duplicate Verifier from any approved Verifier available and provides information on Verifier to the VOO for scheduling.

##### **2. Duplicate Verification Facility Selection**

- 2.1. All facilities that have hosted a verification are subject to a Duplicate Verification.
- 2.2. Selection of facilities for a Duplicate Verification is done jointly by the VOO and SLCP.
- 2.3. Facilities will be chosen based on several criteria including risk factors, size, facility type and geographic location. Risk factors include (but are not limited to) indications of corruption, verified assessment reports with an accuracy rate higher than 95%, suspected or known Verifier performance issues, and verifications associated with disputes or complaints.
- 2.4. The VOO contacts facilities to inform them of the Duplicate Verification.
- 2.5. Duplicate Verifications are announced. The VOO works with the facility and Duplicate Verifier to find a suitable date for the Duplicate Verification.
- 2.6. There are no costs to facilities for Duplicate Verifications.

##### **3. Duplicate Verification Preparation**

- 3.1. Preparation is the same as for a standard verification.

#### **4. Duplicate Verification Methodology**

4.1. Duplicate Verifications consist of the same activities as a standard verification.

#### **5. Submission of Duplicate Verification Data to the VOO**

5.1. If a Duplicate Verification is performed by a VB, the Duplicate Verifier submits an initial Duplicate Verification report to the VOO, using a standard verification tool provided by the VOO.

5.2. Initial Duplicate Verification reports are due to the VOO within 5 business days of the Duplicate Verification

#### **6. VOO Analysis of differences between initial verification and Duplicate Verification**

6.1. The VOO analyzes any differences between the initial verification and the Duplicate Verification. This assessment forms the basis for the VOO's determination of whether SLCP processes were followed and if the Verifier had the required skills and knowledge to conduct the initial verification.

6.2. Based on information provided by the Duplicate Verifier, the VOO categorizes any differences/discrepancies raised during the Duplicate Verification. The VOO assesses if the discrepancies were due to understandable point in time differences or due to systemic oversight or other issues with the initial verification.

6.3. The VOO may follow up with VB Duplicate Verifiers if additional clarifications are necessary.

#### **7. Final Duplicate Verification Report**

7.1. Duplicate Verification reports are completed using a standard report template.

7.2. Reports are completed within 10 business days of the Duplicate Verification.

7.3. Facilities receive a summary of the Duplicate Verification report that includes:

- Details on the Duplicate Verification (when it took place, the party that conducted it, etc.)
- A summary of any legal issues identified during the Duplicate Verification that were not identified during the initial verification
- If there were no significant issues, confirmation that the Duplicate Verification did not show any significant issues

7.4. Verifier Bodies receive a summary of the Duplicate Verification report that includes:

- Details on the Duplicate Verification (when it took place, the party that conducted it, etc.)
- A summary of any legal issues identified during the Duplicate Verification that were missed by the Verifier (i.e. legal issues not identified during the initial verification and would have been present during the initial verification)
- Summary of any other issues identified during the Duplicate Verification that were missed by the Verifier (i.e. issues that were clearly present during the initial verification and not captured in the report)

7.5. The Duplicate Verification may identify serious legal issues that are not a cause for invalidation (see section 8 below) of the report. For example, if a Duplicate Verification identifies a case of child labor but concludes that the child's employment started after the initial verification took place, this is not a serious oversight by the Verifier and therefore not a cause for invalidation. In cases where the Duplicate Verification finds there are significant legal issues that are not causes for invalidation, users of the verified assessment report are informed of these legal issues.

7.5.1. In cases where there are significant legal issues that are not a cause for invalidation, the VOO completes a form that feeds into the SLCP verified assessment report template under "Assessment Information". The VOO then informs all Accredited Hosts and the facility of this

addition to the already final report. The Accredited Host(s) then inform the users of the verified assessment (those who have already received the report through the platform) that the assessment has been updated due to VOO activity. The facility is also encouraged to resubmit the Gateway report to parties they already shared the report with through the Gateway.

## **8. Invalidating Reports**

- 8.1. If the Duplicate Verification finds any of the issues listed in Appendix III, Extreme Cases, the VOO may invalidate the report.
  - 8.1.1. The VOO emails the facility and the VB informs that the report will be invalidated. A short explanation of why the verification is being invalidated is provided.
  - 8.1.2. Four calendar days after the facility and VB are informed, the VOO sets the report status to VRI on the Gateway.
  
- 8.2. Instances where reports are invalidated due to errors or oversights by the Verifier will be reflected in the Verifier scorecard. If a verification is invalidated due to bribery or significant issues with Verifier performance, the VOO may suspend the Verifier from conducting additional verifications. Decisions to suspend Verifiers will be made jointly by the VOO and SLCP.

### **Responsibilities**

#### **Duplicate Verifiers:**

- Conduct Duplicate Verifications in line with this procedure and completing Duplicate Verification reports.

#### **VOO:**

- Ensure that this procedure is followed consistently;
- Conduct QA reviews of Duplicate Verification reports;
- Suspension of Verifiers, in cooperation with SLCP
- Add Duplicate Verification data to Verifier scorecard
- Determine Duplicate Verification facilities, in cooperation with SLCP.

#### **SLCP:**

- Approve updates and amendments to this procedure;
- Suspension of Verifiers, in cooperation with SLCP
- Determine Duplicate Verification facilities, in cooperation with the VOO.

#### **Brands and Facilities:**

- Support and facilitate scheduling of Duplicate Verifications.

## **F. Shadow Verification**

Shadow Verifications are a VOO observation of a verification to assess Verifier performance. During a Shadow Verification, the VOO observes the Verifier to confirm that the Verification Protocol is followed and that the verification is conducted in line with SLCP expectations.

### **Procedure**

#### **1. Shadow Verification Selection**

- 1.1. Verifications are selected for shadowing by the VOO.

- 1.2. Verifications are selected randomly as well as based on risk. Risk factors include known issues with Verifier performance, known issues with VB performance, facilities that are involved in a complaint or dispute and suspected issues of bribery and corruption.
- 1.3. Shadow Verifications are announced to both the VB and the facility.
- 1.4. To facilitate Shadow Verifications, VBs must provide the VOO with information on scheduling of verifications when requested.

## **2. Shadow Verification Process**

- 2.1. During the opening meeting the Shadow Verifier is introduced and the purpose of the Shadow Verification explained.
- 2.2. The Shadow Verifier observes the verification process and notes instances where the Verification Protocol is not followed or where other SLCP requirements are not met by the Verifier. The Shadow Verifier also notes any best practices.
- 2.3. Verifiers are assessed on how well they follow SLCP procedures; their understanding of the SLCP system; professionalism; verification preparation; time management; reporting; knowledge of local laws and regulations; knowledge of social, labor and human rights issues.
- 2.4. During the on-site verification, the Shadow Verifier does not actively participate in the verification. The Shadow Verifier does not gather information, review the facility's self-assessment or provide guidance to the Verifier. The Shadow Verifier may periodically ask the Verifier questions for clarification, but this should not interfere with the Verification process.
- 2.5. The Shadow Verification includes a review of the finalized verified assessment report to assess how accurately the report reflects the on-site verification.
- 2.6. All observations are captured in the Shadow Verification report.

## **3. Shadow Verification Reporting**

- 3.1. Shadow Verification outcomes are recorded using a standard report format.
- 3.2. Shadow Verification reports are completed within 10 business days of the original verified assessment report being finalized.
- 3.3. VBs are provided with the Shadow Verification report.
- 3.4. Shadow Verification outcomes are reflected in the Verifier Scorecard.

## **4. Invalidating Reports**

- 4.1. If during the Shadow Verification, the VOO finds any of the issues listed in Appendix III, Extreme Cases, the VOO may invalidate the report.
- 4.2. The VOO emails the facility and the VB informs that the report will be invalidated. A short explanation of why the verification is being invalidated is provided.
- 4.3. Four calendar days after the facility and VB are informed, the VOO sets the report status to VRI on the Gateway.
- 4.4. Instances where reports are invalidated due to errors or oversights by the Verifier will be reflected in the Verifier scorecard. If a verification is invalidated due to bribery or significant issues with Verifier performance, the VOO may suspend the Verifier from conducting additional verifications. Decisions to suspend Verifiers will be made jointly by the VOO and SLCP.

### **Responsibilities**

#### **Shadow Verifiers:**

- Conduct Shadow Verifications in line with this procedure.

#### **VOO:**

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- Ensure that this procedure is followed consistently;
- Conduct QA reviews of Shadow Verification reports;
- Determine Shadow Verification facilities, in cooperation with SLCP.
- Inform the scorecard

**SLCP:**

- Approve updates and amendments to this procedure;
- Determine Shadow Verification facilities, in cooperation with the VOO.

**Brands and Facilities:**

- Support and facilitate scheduling of Shadow Verifications.

### **G. Feedback from SLCP system users**

Feedback from SLCP system users gives valuable information on the workings of SLCP system and the quality of VBs and the Verifiers. The VOO uses collected feedback to populate VB and Verifier profiles on the back-end of the Gateway, and to determine VB and Verifier ratings. Gathered information will contribute to ensuring quality of verification.

#### **Procedure**

##### **1. Feedback forms**

- 1.1 A feedback form is sent to all facilities after they complete a verification. Facilities are asked to provide comments on the verification process and Verifier conduct. Completing the form is optional.
- 1.2 A feedback form is sent to all Verifiers after they complete verification. Verifiers are asked to provide comments on the verification process. Completing the feedback form is optional.
- 1.3 End users of SLCP assessment data (e.g. brands) can complete a feedback form. They can provide comments on the completeness and accuracy of report data.

##### **2 Feedback outcomes**

- 2.1 All feedback is captured and analyzed by the VOO. The VOO provides SLCP with reporting on feedback.
- 2.2 Feedback is used to determine if any SLCP system users need additional training, guidance or support.
- 2.3 Feedback may result in a formal complaint (see Section I) or may result in the VOO following up directly with a facility, Verifier, VB or brand to resolve an issue.

##### **3 SLCP system users' questions**

- 3.1 Through the online SLCP [Helpdesk](#) system users can submit requests. Requests related to verification are automatically forwarded to the VOO.
- 3.2 Solved information requests are included as FAQ on the support page, and information is captured by the VOO for evaluation of the verification process.

#### **Responsibilities**

- **VOO:** Collect feedback data into database; analyze feedback data; manage complaints (as applicable).

### **H. Disputes (related to verified assessment reports)**

Dispute is an issue related to Verifier conduct or the Verifier not following the Verification Protocol. The dispute process is not used to resolve issues or disagreements over verification outcomes of specific questions. If the facility has concerns about specific verification answers and outcomes of the verification, the Verifier should be made aware of those concerns at the closing meeting, so they can be swiftly resolved within two days of the close of the on-site verification. The facility may also use the ten-day grace period before the verification

is finalized to resolve any question level issues directly with the VB. This process does not require VOO involvement and would not be considered as part of the dispute process.

### **1. Raising Disputes**

- 1.1. Disputes are instances where a facility has an issue with their verified assessment. The VOO receives such disputes.
- 1.2. Only facilities may raise disputes.
- 1.3. Facilities have 10 calendar days from the date a verified assessment is completed (status VRC) to raise a dispute.
- 1.4. Disputes are raised on the Accredited Host platform. When initiating a dispute, facilities are required to provide information on the reason for the dispute.
- 1.5. A facility has one opportunity per verification to raise a dispute. Multiple issues may be included within a single dispute. For example, if the dispute is raised because the Verifier did not spend enough time on site and because the Verifier did not speak the language of management at the facility, these issues are raised together in one dispute.

### **2. Substantiating Disputes**

- 2.1. Within 2 working days, the VOO evaluates the dispute to determine if it is valid.
- 2.2. To be valid, a dispute must relate to Verifier conduct or the Verification Protocol and must relate to a specific verification. Question level issues are not considered valid disputes.
- 2.3. If a dispute is not substantiated, the VOO sets the status of the dispute to VRF on the Gateway.
  - 2.3.1. The VOO notifies the facility that the dispute is not substantiated.
  - 2.3.2. Four days after the notification, the VOO sets the status to VRF.
- 2.4. Disputes that are not substantiated may be treated as complaints. This does not impact the status of the verified assessment.

### **3. Investigating Disputes**

- 3.1. If a dispute is substantiated, the VOO investigates.
- 3.2. The facility, Verifier and/or VB may be contacted to provide additional information.
- 3.3. The VOO attempts to resolve all disputes within 10 working days.

### **4. Outcomes of Disputes**

- 4.1. There are three potential outcomes of a dispute: the VOO determines a change is needed to the report, the VOO determines the report is invalidated or the VOO determines no change is required and the report is finalized with no edits.
  - 4.1.1. If the VOO determines that a change is needed to the report:
    - 4.1.1.1. The VOO informs the Verifier and facility of the change required.
    - 4.1.1.2. The VOO sets the status of the report to VRC.
    - 4.1.1.3. The Verifier and the facility have 5 calendar days to make and review the change.
    - 4.1.1.4. After 5 days the status of the report automatically changes to VRF unless the facility selected VRF prior to day 5.
  - 4.1.2. If the VOO determines there were significant issues and the verification meets the criteria for invalidation (see Appendix III for criteria for invalidating a verification):
    - 4.1.2.1. The VOO informs the Verifier and the facility that the verified assessment report will be invalidated
    - 4.1.2.2. Four calendar days after the VOO informs the Verifier and the facility, the VOO sets the status to VRI. The data in the assessment will not be available anymore for sharing or downloading on the Gateway.

- 4.1.3. If the VOO determines that the dispute is not substantiated, no changes are made to the report:
  - 4.1.3.1. The VOO informs the Verifier and the facility that the verified assessment report will not be changed.
  - 4.1.3.2. Four days after the VOO informs the Verifier and the facility, the VOO sets the status to VRF.

## 5. Tracking and Reporting of Disputes

- 5.1. All disputes received by the VOO are tracked.
- 5.2. Outcomes of the dispute are reflected in the verified assessment report in one of the following ways:
  - Dispute substantiated: status set by VOO to VRC
  - Dispute substantiated: status set by VOO to VRI
  - Dispute not substantiated: status set by VOO to VRF

### **Responsibilities**

**VOO:** Collect, review and investigate disputes related to verified assessment reports.

## **I. Complaints (related to SLCP assessment and/or verification process)**

The complaints mechanism is a formal channel for all SLCP system users to raise concerns about the SLCP assessment and/or verification process. Through the complaint mechanism, issues are reviewed and addressed.

### **Procedure**

#### **1. Filing complaint**

- 1.1. Any SLCP system user may raise a complaint on an SLCP assessment and/or verification process. A complaint should include details on the nature and content of the complaint and the parties involved, preferably including names and contact details. A complaint can be filed anonymously.
- 1.2. Complaints are raised on the SLCP [Helpdesk](#). If a system or user raises a complaint on an SLCP assessment and/or verification through another channel, they are included in the SLCP Helpdesk and brought to the attention of the VOO. Any complaints received by the VOO are included on the SLCP Helpdesk.
- 1.3. In addition to formally making a complaint, other feedback mechanisms may result in a complaint being created:
  1. SLCP user feedback forms: negative feedback that requires further investigation may be treated as a complaint.
  2. Disputes on a verification outcome (section H) may lead to or be recategorized as a complaint.
  3. Other feedback received (e.g. Helpdesk tickets) may be categorized and investigated as a complaint.

#### **2. Substantiating Complaints**

- 2.1. Within 5 working days of receiving the complaint, the VOO evaluates the complaint to determine if it is valid. The VOO may request additional information from the complainant to substantiate the complaint.
- 2.2. To be valid, a complaint must relate to the SLCP assessment and verification process or the conduct of its users (i.e. facilities, Verifiers). The VOO reviews each complaint received to determine if it is valid.
  - 2.2.1. Complaints relating to pricing or aspects of VB/AH/Brand business decisions are not considered valid.
  - 2.2.2. Issues that have been resolved through the dispute mechanism are not considered valid.

2.2.3. Technology issues relating to Accredited Hosts or the Gateway platform are referred to the appropriate AH or ITC.

2.2.4. Some issues raised through the complaint process may not be valid complaints and/or out of scope of SLCP assessments and/or verification, but may be useful input for SLCP (for example, if the complaint form is used to express dissatisfaction about the SLCP broader program such as country scope, fee charges, voting rights, communication etc.). This information is forwarded to SLCP Secretariat.

2.3. The VOO may forward complaints the SLCP Secretariat or stakeholders for further follow up and investigation.

### **3. Investigating Complaints**

3.1. If a complaint relates to the assessment and verification process (Verifier conduct, Verification Protocol, verified assessment reports) the VOO will investigate the case.

3.2. The complainant may be contacted during the investigation to provide additional information.

3.3. A decision regarding the complaint is made by someone other than the VOO personnel investigating the complaint.

3.4. The VOO attempts to resolve all complaints within 10 working days.

3.5. Once the complaint is resolved, or if it cannot be resolved, the complainant is informed of the outcomes.

### **4. Confidentiality**

4.1. The VOO makes reasonable efforts to ensure the confidentiality of complaints and the identity of complainants. The VOO refrains from providing names of complainants, Verifiers, VBs, facilities or providing other identifying information when investigating complaints.

4.2. If a complaint cannot be investigated without identifying the complainant, the complainant is first informed that their complaint cannot be kept confidential. The complainant is given the option to withdraw their complaint.

### **5. Tracking and Reporting on Complaints**

5.1. All complaints received by the VOO are tracked, including complaints that are not substantiated.

5.2. The VOO reports to SLCP on the status of complaints on a weekly basis.

5.3. Information can be used to populate the VB/Verifier scorecard.

### **Responsibilities**

- **VOO:** Respond and if relevant act upon complaints filed in relation to SLCP assessments and/or verification process.

**Note:** any SLCP signatory or stakeholder can raise a **general** complaint related to SLCP through the SLCP website: [www.slconvergence.org](http://www.slconvergence.org). Complaints raised there will follow the Dispute Mechanism (set forth in SLCP Governance Document available on [Connect](#)). These **general** complaints are outside the scope of this QA manual as they are the responsibility of the SLCP Secretariat and Council, and not the VOO.

## **J. Verifier Performance Scoring**

Verifier scoring takes data from the QA process and uses it to fill the Verifier scorecard. This will ultimately result in a public rating of a Verifier.

### **Procedure**

## 1. Scoring Inputs

1.1. The following sources of data on Verifier performance are used to calculate the Verifier Score:

- Match with SLCP criteria
- Verifier exam scores
- Desktop Review outcomes
- Counter Verification outcomes
- Duplicate Verification outcomes
- Shadow Verification outcomes
- Facility feedback
- Brand/report user feedback
- Disputes
- External partner review, i.e. APSCA information

## 2. Scoring Criteria

2.1. Verifier performance is rated by the VOO according to set criteria.

2.2. A score is provided for each Verifier for which data is available.

2.3. The scoring inputs described in 1.1 are aggregated into a single numeric Verifier score.

2.4. The Verifier score is an average score from all verifications for which scores exist.

2.5. Inputs are weighted based on importance (QA items are considered more important than feedback).

2.6. Data on scores is stored in VOO database and transferred to the Gateway and attached to each verification. VBs have access to an online dashboard with the scores of their Verifiers and feedback for improvement (see below).

## 3. Communications

3.1. The VOO provides each VB with a private dashboard summarizing performance data including:

3.1.1. VB's individual Verifier scores (including average score for all Verifiers for comparison)

3.1.2. Messages and bulletins summarizing areas of potential improvement

3.1.3. Results of VB assessments

3.2. The purpose of these dashboard is to provide feedback on overall and individual Verifier quality. It is expected that VB's will use the data to implement internal Quality Assurance procedures and training to ensure continuous improvement of SLCP verifications.

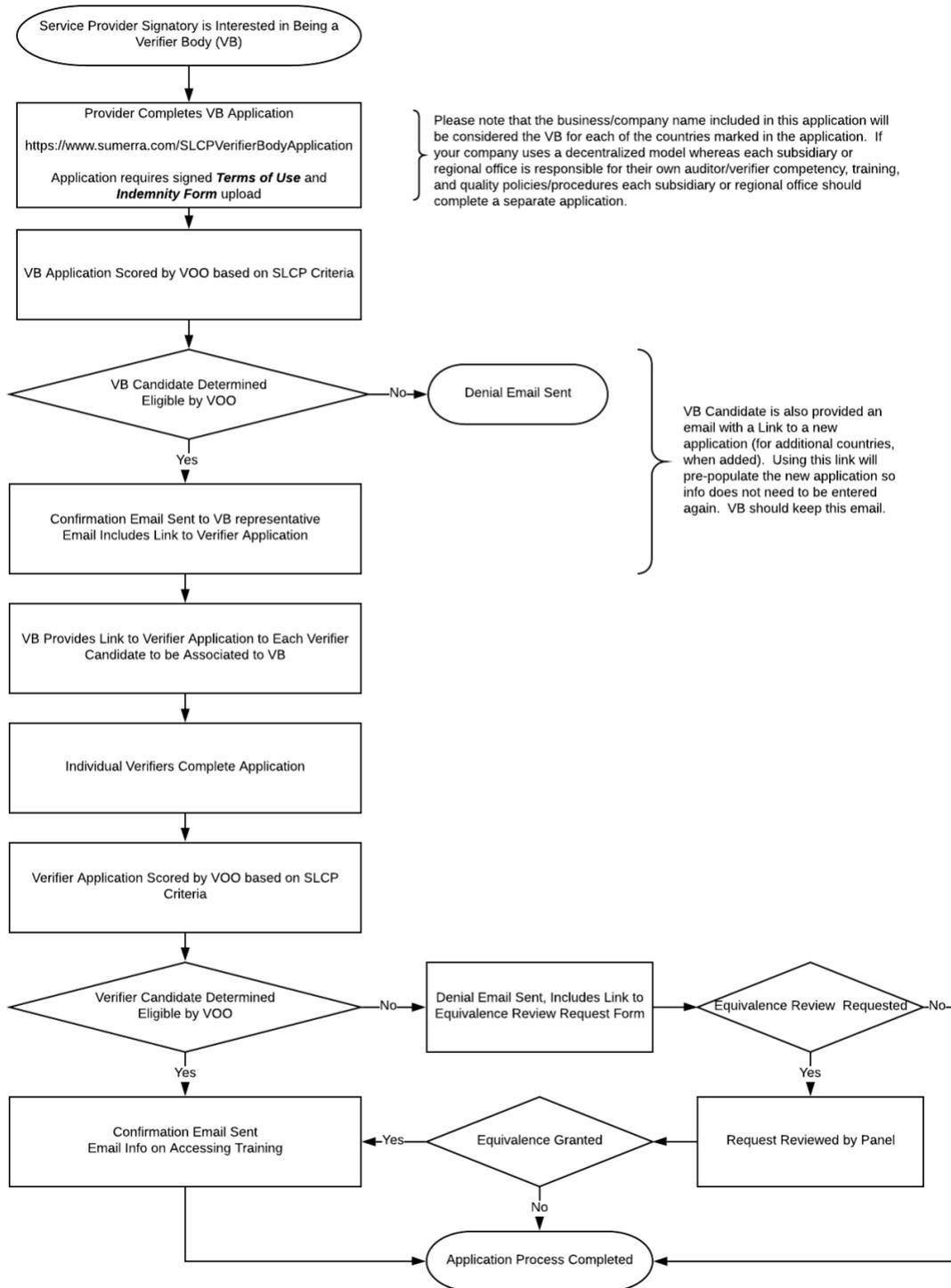
## Responsibilities

**VOO:** Collect scoring data and calculate Verifier scores.

**VB:** Develop action plans based on Verifier improvement feedback.

## Appendices

### Appendix I – VB & Verifier Selection Process



## Appendix II – QA Flags

QA flags are used to identify cases that are to be reviewed through the QA process and can relate to (1) verification procedure, (2) Verifier conduct or (3) verified assessment report content.

### Verification procedure

- Language mismatch—language spoken by Verifier is not the primary language spoken by management AND/OR production workers at the facility
- Country mismatch—Verifier does not reside in the country where the verification took place
- Verification does not take place over consecutive days
- Verification is more than 3 person-days and only 1 Verifier conducts the verification
- Joint-assessor is also listed as a Verifier in the verified assessment report
- Joint assessor and Verifier work for the same Verifier Body
- Assessment uploaded more than ten days after downloading the Data Collection Tool from the Accredited Host site

### Verifier conduct

- Verifier is the subject of a dispute
- Verifier has been suspected of bribery in the past

### Report content

- # of workers updated during verification
- Verified assessment report accuracy level over 95%
- Little finding data noted in Verifier’s verification data responses

## Appendix III – Extreme Cases (causes for invalidating reports)

Extreme cases would invalidate a verified assessment report. When a verified assessment report is considered invalid, the status “Verification Invalidated” (VRI) is attributed in the Gateway and all stakeholders (facility, Verifier, end user) are notified via email or through viewing of assessment status information on the Gateway and/or Accredited Host platform.

Verified assessment report is considered invalid when:

### 1. Basic quality standards are not met:

- a. Tool not completed (over 5% of the questions left blank)
- b. Tool not completed in English
- c. Significant # of findings not supported with evidence
- d. Significant # of findings not clearly communicated (findings are not written clearly; findings can be interpreted in more than one way; tool questions not correctly answered)

### 2. Verifier requirements are not met:

- a. Verifier not approved by VOO
- b. Verifier visiting facility for second time in a row
- c. Verifier supported facility in the joint-assessment
- d. Verifier did not spend sufficient person-days on site

**3. Significant issues with the verification process are found:**

- a. Evidence of bribery (solicited or accepted by Verifier)
- b. Verifier was denied access to facility grounds (entirely or in part)
- c. Verifier was denied access to workers (interviews)
- d. Verifier was denied access to information (documents)
- e. Findings at the verified site were not captured in the report

**Appendix IX – Summary of SLCP Process and Assessment Statuses**

