

**SLCP Verifier Body Requirements**

**Version 1.2**

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**Change Log**

<b>Date</b>	<b>Section</b>	<b>Change Summary</b>
2020/12/17	New: Table of Contents	Insertion of Table of Contents
2020/12/17	New: Verifier Status Maintenance	Entire sub-section 7. Verifier Status Maintenance is new All numbering after this new section has been updated
2020/12/17	New: Freelance and Subcontracted Verifiers	Entire new sub-section 8. Freelance Verifiers Entire new sub-section 9. Subcontracted Verifiers
2020/12/17	10.3 new requirement	New addition to 10. Informing the VOO of staff changes Addition addresses APSCA status changes
2020/12/17	New: Observations of Verifications by Brands	Entire new sub-section 13. Procedures for Observations of Verifications
2020/12/17	14.4 change in requirement and new requirement	New addition to 14. Ethics and Integrity Procedures <ul style="list-style-type: none"> <li>• How Verifiers can raise concerns about ethical issues, including when a facility offers a bribe or acts unethically</li> <li>• How facilities can report on instances where Verifiers solicit or accept bribes or act unethically</li> </ul>
2020/12/17	15.4 change in requirement	Change to 15. Impartiality 15.4 If a Verifier engages in consulting work (including but not limited to advisory and training services) at a facility, they are prohibited from conducting verifications at that facility for a period of 2 years.
2020/12/17	18.5 new requirement	New addition to 18. VB Fees 18.5 Invoices for fees are issued by SLCP to the VB head office (the main point of contact for the SLCP program). SLCP does not split invoices or issues invoices to a VB's regional office.
2020/12/17	New: Corrective Action Requests, Terminations and Suspensions	Entire section new with sub-sections: 20. Corrective Action Requests 21. Corrective Action Plans 22. VB suspension 23. Verifier Suspension
2021/07/22	Reorganization of entire document	Moving existing requirements around Creating clearer headings/ sections New section names
2021/07/22	Use of shall instead of must	Differentiating shall and should
2021/07/22	New content	Glossary 1. General Requirements (more requirements) VB Status & Eligibility (2. – 6.) Verifier Status & Eligibility (7. – 13.; some content old requirements but moved to this new section) 14. Roles and Responsibilities Performance Monitoring (24. – 26.) 28. Corrective Action Plans (more requirements) Annex 1
2021/07/22	Revised content	15. Competence 16. Training 20. Subcontracted Verifiers 27. Corrective Action Requests 29. Procedures for Observations of Verifications 31. Impartiality 35. Penalties for non-payment

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Converged Assessment.  
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Improved Working Conditions.

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**Glossary**

Item	Definition
Verifier Body (VB)	The organization that employs and manages Verifiers. Responsible for assigning Verifiers when an SLCP verification is requested.
Verifier (VE)	Person approved to perform an SLCP verification. Responsible for assessing the completeness and accuracy of the data collected through self/joint-assessment of facilities, using the CAF.
Verification Oversight Organization (VOO)	Entity responsible for the day-to-day management of SLCP verifications. Selects, approves and manages VBs and Verifiers, 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 the scoring system for SLCP approved Verifiers and VBs, collects Verifiers' performance data, provides verification support desk for all SLCP system users, gathers feedback from SLCP system users, and handles dispute resolution between a facility and a Verifier.
Gateway	The central repository of SLCP verified assessments. All verified assessments are stored safely on an UN server. Registered facilities have access to their verified assessments at all times and can download these. Apart from this the Gateway serves 4 critical functions: <ol style="list-style-type: none"> <li>1. Central (and open) resource of Converged Assessment Framework, SLCP process and related information and support material</li> <li>2. Account Management and unique IDs for facilities, Verifier Bodies and Verifiers</li> <li>3. Management of statuses of the SLCP assessment cycle. Facilities can see the status of their SLCP assessment throughout and at all times.</li> <li>4. Re(distribution) of verified assessments (VRF status) with facility permission.</li> </ol>

Item	Definition
Deactivation	<p>Deactivations are issued to Verifier Bodies and/or Verifiers on the Gateway due to suspension, separation from approved VB, or a temporary status related to failure to conduct required activities.</p> <p>Deactivated profiles may not perform activities on behalf of SLCP. With a deactivated status, Verifier Bodies cannot assign Verifiers through the Gateway and can therefore no longer complete verifications. Deactivated Verifiers cannot be selected by the applicable Verifier Body to conduct a verification.</p> <p>If deactivation is not related to suspension or termination, it will then be a temporary status until the Verifier Body/ Verifier completes required activities. After the Verifier Body/ Verifier completes the required activities, within 24 hours during a working day, the Verification Oversight Organization will reactivate the Verifier Body/ Verifier on the Gateway.</p>
Suspension	Suspension means a Verifier or Verifier Body is removed from the SLCP system for a defined period. Suspensions are communicated publicly on the <a href="#">VB public list</a> .
Termination	Termination means complete removal from SLCP and no possibility of re-entering SLCP as VB or Verifier.
Use of 'shall' or 'should'	The word 'shall' indicates a requirement and the word 'should' indicates a recommendation.

## Introduction

This document outlines the requirements that SLCP Verifier Bodies (VBs) shall meet to maintain their status as approved VBs.

## Scope

This document applies to all SLCP approved VBs.

## Requirements

### General

#### 1. General Requirements

- 1.1. VBs are subject to the Quality Assurance procedures outlined in the [QA Manual](#).
- 1.2. VBs shall respond to reasonable requests for information from the VOO in a timely manner. Examples include:
  - 1.2.1. VOO request for VB schedule of future verifications for the purpose of scheduling Shadow Verifications.
  - 1.2.2. VOO requests for information regarding potential protocol violations.

- 1.2.3. VOO requests for registration or contact information of program administrators or local offices.
- 1.2.4. VOO requests for details on verifications in support of complaints, disputes, or ethics investigations.
- 1.2.5. Other reasonable VOO requests needed to conduct its duties in overseeing the program.
- 1.3. Repeat failure to respond in a timely manner can lead to deactivation or suspension at the discretion of the VOO.

## **VB Status & Eligibility**

### **2. VB Status: Active**

- 2.1 After applying and receiving approval from VOO, VBs are granted Active status in the SLCP Gateway.
- 2.2 Only VBs with Active status are eligible to perform SLCP activities.

### **3. VB Status: Deactivated**

- 3.1 The VOO holds the right to deactivate a VB for poor performance related to QA activities and failure to meet the Verifier Body Requirements outlined in this document at any time.
- 3.2 Deactivated VB is marked in the Gateway as Deactivated and is thus ineligible to perform any SLCP activities, including verifications.
- 3.3 Deactivation can result in reactivation after following required activities listed by the VOO.
- 3.4 Once deactivated, VB failure to take action to follow requirements and procedures can further escalate to suspension.

### **4. VB Status: Suspension**

- 4.1 The VOO holds the right to suspend any VB for failure to remediate when deactivated or at any time due to the following:
  - 4.1.1 Unethical behavior (a minimum 12-month suspension applies for any unethical behavior).
  - 4.1.2 Serious quality concerns.
  - 4.1.3 Repeat breaches of requirements and procedures.
  - 4.1.4 Breach of SLCP VB Terms of Use.
  - 4.1.5 Reports of unethical behavior and/ or serious quality concerns can also be reported outside of SLCP and need not be identified by the VOO to be considered grounds for suspension.
- 4.2 Suspended VBs are removed from the SLCP system and are ineligible to perform SLCP activities for the defined suspension period.

### **5. Lifting VB Suspension**

- 5.1 To qualify for reactivation after suspension, the following must be met:
  - 5.1.1 If the VB is an APSCA member firm prior to suspension from SLCP, the VB shall obtain the original APSCA member status (or higher) prior to the VOO considering the VB for reactivation.
  - 5.1.2 The applicable suspension period must have passed.
- 5.2 If the above conditions are met, the VB can be reactivated by:
  - 5.2.1 Submitting a written request for reactivation to the VOO.
  - 5.2.2 After approval by VOO, paying a fee (up to US\$1,000 – final fee based on hours accumulated for service) to cover cost for VOO review of VB system/ procedure

improvements to address suspension issue/ type. Fee will not be returned if VB fails the review.

5.2.3 Submitting to and passing the VOO review.

## 6. VB Status: Terminated

6.1 The VOO holds the right to terminate a VB, which means permanent removal from SLCP without possible re-entry into SLCP due to the following:

6.1.1 Severe breach of ethics/ integrity.

6.1.2 Breach of SLCP VB Terms of Use that results in serious harm to SLCP or similar.

6.2 Reports of severe breach of ethics/ integrity can also be reported outside of SLCP and need not be identified by the VOO to be considered grounds for termination.

## Verifier Status & Eligibility

### 7. VB Responsibility

7.1 VBs shall ensure their Verifiers maintain SLCP Active status to perform SLCP activities.

### 8. Verifier Status: Active

8.1 After applying and receiving approval from VOO, Verifiers are granted Active status in the SLCP Gateway.

8.2 Only Verifiers with Active status are eligible to perform SLCP activities.

### 9. Maintaining Active Status

9.1 Verifiers shall maintain their “active” status annually to continue performing SLCP activities.

9.2 Status maintenance is achieved through:

9.2.1 The completion of any SLCP required training courses (e.g., updated Verifier training).

9.2.2 Annual completion of the renewal training on Sumerra Training and Education Platform (STEP; <https://training.sumerra.com>) managed by the VOO.

9.2.3 Completion of other continual professional development (CPD).

9.2.4 Annual submission of a Verifier Status Maintenance (VSM) Worksheet for review and approval by the VOO. VSM worksheets are available on and submitted through the STEP platform.

9.3 The minimum requirements for continual professional development (CPD) are:

9.3.1 Minimum of 16 hours of Social & Labor System Assessments (e.g., audits, verifications). This includes but is not limited to SLCP verifications, brand CoC audits, RBA/ICTI/WRAP, SA8000 audits, etc.

9.3.2 Minimum of 16 hours of professional and knowledge practice. This includes:

9.3.2.1 Specialized training on Relevant Subject Matter or Social Compliance (e.g., Forced Labor Awareness, Ethics, Fire Safety Training, Schemes, etc.)

9.3.2.2 Attendance/Speaking at Relevant Industry Conferences

9.3.2.3 Delivering External Training

9.3.2.4 Volunteer Participation on Relevant Committee/Board

9.3.2.5 Other Activities

9.4 Maintaining APSCA CSCA certification is considered equivalent to the professional development requirements listed under minimum requirements above.

9.5 Verifiers have a 30-day grace period after the one-year anniversary of approval (giving them 12 to 13 months of total approval period).

### 10. Verifier Status: Deactivated

- 10.1 Candidates whose Verifier status has expired due to failure to complete Verifier Status Maintenance (VSM) requirements, including required SLCP training and VSM worksheet, will be Deactivated.
- 10.2 Candidates can reactivate their Verifier status after expiration date by:
  - 10.2.1 Submitting reinstatement form to VOO (a link to the form is provided via suspension notification email or via request).
  - 10.2.2 Completing necessary SLCP training.
  - 10.2.3 Submitting VSM Worksheet covering the prior 12 months immediately preceding the reactivation request.
- 10.3 Reactivation is subject to automatic audit and verification of VSM-related material and payment of US\$200 re-activation fee plus any applicable annual/upcharge fees.

## **11. Verifier Status: Suspended**

- 11.1 The VOO holds the right to suspend Verifiers at any time due to unethical behavior or for serious quality issues.
- 11.2 If a Verifier is suspected of unethical behavior, an investigation is conducted as outlined in the QA Manual.
  - 11.2.1 If the outcome of the investigation is that the Verifier did behave unethically and the firm is an APSCA member firm, the VB follows APSCA's process for sanctioning assessors. The Verifier is suspended from SLCP by the VOO for a minimum of 12 months.
  - 11.2.2 If outcome of the investigation is that the Verifier did behave unethically and the firm is NOT an APSCA firm, the Verifier is suspended from SLCP by the VOO for a minimum of 12 months.
- 11.3 Verifiers may be suspended for serious quality issues, including:
  - 11.3.1 Quality scores that are significantly lower than a baseline (defined by SLCP) and do not improve over time.
  - 11.3.2 More than 1 report is invalidated within a 12-month period.
  - 11.3.3 More than 1 substantiated complaint received within a 12-month period.
  - 11.3.4 Other serious quality issues.
- 11.4 Verifiers who are at risk of becoming suspended due to quality issues are notified by the VOO prior to their suspension and informed of actions necessary to avoid suspension. VBs who use Verifiers that are at risk of being suspended may be required to complete a corrective action request (CAR) to address the quality issues.
- 11.5 Suspensions occur as follows:
  - 11.5.1 VOO informs the VB that the Verifier shall be suspended.
  - 11.5.2 Suspension takes place within 3 business days of end of the VOO's investigation.
  - 11.5.3 The VOO deprovisions the Verifier from the Gateway and any other associated SLCP accounts.

## **12. Lifting Verifier Suspension**

- 12.1 Verifiers that are suspended for unethical behavior or serious quality issues may reapply to become Verifiers after the end of the suspension period and the VB that employs them can demonstrate they have taken sufficient measures to improve the Verifier's quality.
- 12.2 Verifier suspensions can be lifted after the applicable suspension period has passed by:
  - 12.2.1 Submitting a written request for re-application to the VOO.
  - 12.2.2 After approval by VOO, completing new Verifier application.
  - 12.2.3 Paying US\$200 re-activation fee (will not be returned if Verifier fails the exam).
  - 12.2.4 Retaking the exam.
  - 12.2.5 Paying any required annual fees.



### 13. Verifier Status: Terminated

- 13.1 The VOO holds the right to terminate Verifiers at any time due to unethical behavior or for serious quality issues.
- 13.2 Failure to address corrective actions issued by the VOO during a suspension may result in termination.
- 13.3 Verifiers who engage in bribery are terminated and may not reapply to become Verifiers.

## Resource & Personnel Requirements

### 14. Roles and Responsibilities

- 14.1 VBs shall establish internal management systems that define the roles and responsibilities of non-Verifier personnel (VB Administrators) involved in SLCP verifications. The organization of roles and responsibilities is expected to vary depending on the size and complexity of the organization.
- 14.2 VBs should register VB Administrators with the VOO. A [form](#) is available for registration.
- 14.3 The SLCP does not define or require specific roles. However, it is recommended that VBs should establish roles equivalent to the below:
  - 14.3.1 Scheme Manager
    - 14.3.1.1 This role has overall responsibility for the performance and quality of the Verifications. This manager shall act as the point of contact with VOO to answer queries or to discuss issues for all activities globally.
    - 14.3.1.2 The Scheme Manager is also responsible for ensuring that Verifiers are up to date with training and updates to the CAF.
    - 14.3.1.3 The Scheme Manager should be an employee and not a subcontractor.
    - 14.3.1.4 The Scheme Manager should be fluent in English.
  - 14.3.2 Report Reviewer
    - 14.3.2.1 This role is part of the internal quality team and participates in the required internal quality assurance review of verified reports before they are finalized (see Section 25.1.1).
  - 14.3.3 In-House Trainer
    - 14.3.3.1 This role has responsibility to develop and deliver SLCP training (see Section 16).
    - 14.3.3.2 The In-House trainer should be responsible to track and maintain training as current for Verifiers.

### 15. Competence

- 15.1 VBs shall have procedures that address how VBs ensure Verifiers meet the SLCP Verifier requirements (see the SLCP QA Manual for complete list of SLCP Verifier Requirements).
- 15.2 Competency requirements shall cover VB Administrators (e.g., Scheme Managers, Report Reviewers, In-House Trainers, Other Administrators as defined by VB).
  - 15.2.1 Report reviewers shall complete an equivalent of the 'Verifier Body Manager Course' provided by the [ITC](#) and have knowledge of social auditing.
  - 15.2.2 Other Administrators shall understand SLCP protocols and VB Requirements.
- 15.3 VBs shall maintain records that demonstrate how SLCP competence requirements are met.

### 16. Training

- 16.1 VBs shall ensure that Verifiers have the knowledge and skills appropriate to conduct high quality, reliable verifications. VBs shall conduct training for all Verifiers, including initial

onboarding training and continuous training to ensure current knowledge and acceptable performance.

- 16.2 VBs shall have established procedures outlining how onboarding training for SLCP is provided to new Verifiers.
  - 16.2.1 Onboarding training shall be provided to new Verifiers and currently employed auditors who become SLCP Verifiers. This shall be provided in addition to the required SLCP Verifier Course by the VB.
  - 16.2.2 Global onboarding training procedures may be used, but onboarding training for SLCP Verifiers shall cover SLCP specifically.
  - 16.2.3 Procedures shall define the length of SLCP onboarding training.
- 16.3 VBs shall provide all Verifiers with continuous training on SLCP.
  - 16.3.1 Training should be provided at least once a year.
  - 16.3.2 Training shall be linked to the outcomes of performance evaluation/monitoring.
  - 16.3.3 Training shall be provided if there are significant changes to the SLCP system. The Verification Oversight Organization (VOO) will notify VBs when this type of ongoing training is required.
- 16.4 VBs shall maintain records that show all Verifiers have undergone onboarding and continuous training.
- 16.5 VBs are responsible for ensuring trainings are effective. SLCP does not define the length, format, and content for these trainings.
- 16.6 SLCP provided Verifier Body Calibration webinars shall be attended by a VB representative and content of the webinars can be used for continuous Verifier training.
  - 16.6.1 All VBs shall send a representative to the Calibration Webinars. This may include attending the entire live session or viewing the recorded webinar, in its entirety, through the Sumerra Training and Education Platform (STEP; <https://training.sumerra.com>) managed by the VOO.
    - 16.6.1.1 VBs are notified in advance of Calibration Webinars. Recordings are made available to all VBs after the live session and a notification is sent. SLCP maintains a Knowledgebase of questions and answers that came up during Calibration Webinars.
  - 16.6.2 Failure to attend/view a Calibration Webinar is grounds for deactivation.
    - 16.6.2.1 VOO will reactivate the VB after the VB completes the requirement.

## 17. Calibration

- 17.1 VBs shall have methods to ensure the consistency of SLCP verification outcomes among Verifiers.
- 17.2 Calibrations ensure verifications are conducted consistently. Performance monitoring activities should be used to identify where calibration is needed.
- 17.3 A documented procedure on calibration is not required if VBs can describe and demonstrate their internal measures for calibration.
- 17.4 Continuous training and performance monitoring can be used to meet this requirement if VBs can demonstrate how the outcomes of these activities are used to calibrate Verifiers.

## 18. Knowledge of SLCP Subject Areas

- 18.1 VBs shall make available to Verifiers up-to-date, appropriate resources on labor and health and safety laws.
- 18.2 Verifiers shall be able to access this information before or during a verification.

## 19. Freelance Verifiers

- 19.1 VB does not hire any 'freelance' Verifiers as SLCP prohibits the use of 'freelance' Verifiers for any SLCP verifications.
- 19.2 'Freelance' means the Verifier is not a direct employee of the VB and is free to work as a contractor conducting SLCP verifications for any company that wishes to hire them.

## **20. Subcontracted Verifiers**

- 20.1 Use of part-time or subcontracted Verifiers is permitted ONLY if the Verifier works on a subcontracted/part-time basis exclusively for one VB for the purpose of SLCP Verifications (a Verifier can still conduct other assessments for multiple companies).
- 20.2 If using part-time or subcontracted Verifiers, the VB shall exercise and enforce the same criteria as when utilizing full time employees.
- 20.2.1 The VB's SLCP policies and procedures on Verifier qualifications, internal training, performance monitoring, calibration and ethics/integrity shall be applied to part-time and subcontracted Verifiers.
- 20.2.2 Any part-time/subcontracted Verifier shall also be documented to be covered by the VB's Professional Liability Insurance coverage; and/or Indemnification; the SLCP Verifier Body Agreement; and any applicable SLCP Terms of Use.
- 20.3 VBs shall maintain documentation that demonstrates how any subcontracted/part-time Verifiers meet these requirements. This documentation may include subcontracting agreements; internal training logs for part-time/subcontracted Verifiers; affidavits/documentation from insurer indicating coverage of such Verifiers; Performance Monitoring results for part-time/subcontracted Verifiers.
- 20.3.1 VBs shall produce documentation upon request of VOO.

## **Changes to VB Staffing**

### **21. Informing the VOO of Staff Changes**

- 21.1 If a Verifier ceases to be employed by a VB, the VB shall inform the VOO immediately. VBs can inform the VOO by emailing [SLCP@sumerra.com](mailto:SLCP@sumerra.com).
- 21.2 Any delays in informing the VOO of these staffing changes may result in VBs being charged Verifier Access Fees for these Verifiers. If a Verifier leaves the Verifier Body prior to the invoice being issued, SLCP will waive the Verifier Access fee if a) they have not yet conducted any verifications and b) the VB informs the VOO immediately of their departure. For more information on Verifier Access Fees, see the list of [SLCP Fees](#).
- 21.3 APSCA Member Firms who are VBs shall inform the VOO of any 'downgrade' of APSCA status of Verifiers associated with the VB. For example, if a CSCA or Registered Auditor is downgraded to Associate membership or if membership is revoked or suspended for any reason.

### **22. Transfer of SLCP Verifier Approvals**

- 22.1 VBs that add an existing Verifier to their employ can maintain their approval status. Reapplication is not required if a Verifier transfers from one approved VB to another.
- 22.2 To maintain her/his approval status, the Verifier or VB shall complete [this form](#).

## **Use of Translators**

### **23. Translator Qualifications**

- 23.1 VBs shall have a procedure for vetting translators to ensure they are trained in and understand social compliance topics.

23.2 VB shall ensure that translators understand and abide by the VB's internal Code of Conduct, confidentiality requirements, all applicable terms of the SLCP Code of Conduct, and requirements under SLCP Professional Conduct, contained in the [Verification Protocol Annex](#).

## Performance Monitoring

### 24. SLCP Performance Monitoring and Scoring

- 24.1 The VOO monitors VB and Verifier performance.
- 24.2 See the SLCP QA Manual for details on Verifier and VB scoring.
- 24.3 VB Scoring is a cumulative score calculated using the Verifier scoring and VB Systems Check scoring.
- 24.4 Applicable scoring of VBs and their Verifiers is shared with VBs via the VB Dashboard managed by the VOO.
- 24.5 Average Verifier scores by country across all SLCP Verifiers with scoring are also shared on the VB Dashboard.

### 25. VB Monitoring Performance of its Verifiers

- 25.1 VBs shall have procedures for monitoring Verifier performance.
  - 25.1.1 VBs shall conduct an internal quality review of 100% of SLCP reports before the verification is completed and passed on to the facility for review.
    - 25.1.1.1 SLCP's [Verifier Guidance](#) can be referenced for quality review activity.
- 25.2 SLCP Verifier scoring shall be considered in performance monitoring.
- 25.3 VBs shall define the actions they take when Verifier performance and/or SLCP Verifier scoring is less than acceptable.
  - 25.3.1 At minimum, VBs shall require training AND witness Verifier in the field if performance is less than acceptable. Witness audits for other programs/schemes may be used for this purpose.
- 25.4 Global procedures for performance monitoring covering multiple schemes may be used, but VBs shall be able to demonstrate how SLCP is covered.

### 26. Integrity Oversight Program

- 26.1 VB performance scoring affects a VB's status in SLCP.
- 26.2 On an ongoing basis, the VOO analyzes VB scores and produces a statistical distribution, including a mean score and standard deviation.
- 26.3 Based on this distribution, the VOO determines a risk scale based on the curve (scale of deviation from the mean):
  - 26.3.1 Level 3 Risk (highest risk)
  - 26.3.2 Level 2 Risk
  - 26.3.3 Level 1 Risk (lowest risk)
- 26.4 VBs are assessed against the risk scale and determined a risk-rating based on their overall VB performance score.
- 26.5 Continual low performing or high risk VBs can affect a VB's status in SLCP.
  - 26.5.1 The VOO follows a three-strike system (see Annex 1 for flowchart):
    - 26.5.1.1 When VBs receive a Level 3 risk status more than 2 times (more than 2 strikes), VB's status will change to 'Suspended' and VBs are no longer able to perform SLCP activities. Suspension will also result if VB fails to pay for mandatory QA or fails to meet scoring thresholds for mandatory QA (see Section 26.6.4).
      - 26.5.1.1.1 This status will be communicated publicly on the [SLCP Verifier Bodies](#)

[List.](#)

26.5.1.1.2 Suspended status lasts for a minimum of 12 months.

26.5.1.1.3 This status will be communicated publicly on the [SLCP Verifier Bodies](#)

[List.](#)

26.6 Process and VB Required Actions when determined a Level-3 Risk

26.6.1 VBs deemed a Level 3 Risk are placed 'On Probation' status and action shall be taken to avoid suspension.

26.6.2 This status will be communicated publicly on the [SLCP Verifier Bodies List.](#)

26.6.3 The VOO will notify the VB of the status.

26.6.3.1 The notification will be made via email to the primary VB contact.

26.6.3.2 The notification will include:

26.6.3.2.1 A summary of the QA issues discovered resulting in low scores.

26.6.3.2.2 A summary of required next steps.

26.6.4 To avoid suspension, VB shall pay up front for additional QA activities as follows:

26.6.4.1 A Shadow Verification selected by the VOO. The fee will depend on location and length of selected Verification. On average, fees for Shadow Verification are less than US \$3,500.

26.6.4.2 Full desktop review of the next three VRF produced by VB. The fee for desktop reviews will not exceed US\$750.

26.6.4.3 A VB Assessment focused on the identified failures. The fee for VB Assessment will not exceed US\$1,000.

26.6.4.4 SLCP will invoice VB for the cost of the above.

26.6.4.5 Payment is due net 30 days (or other mutually agreed upon arrangement for payment)

26.6.5 The VOO will conduct the above-mentioned activities.

26.6.6 To avoid suspension, all QA scores shall be 'greater than' the mean scores for that activity.

26.6.6.1 If any scores do not meet threshold above, VB is suspended.

26.6.6.2 If scores meet threshold, VB is removed from 'On Probation' status.

26.6.7 One strike counting toward the three-strike mechanism remains on VB record.

26.7 Level 2 Risk

26.7.1 The VOO will notify VB of the status.

26.7.2 The notification will be made via email to the primary VB contact.

26.7.3 The notification will include:

26.7.3.1 A summary of the QA issues discovered resulting in low scores.

26.7.3.2 Suggestions for improving the score.

26.7.4 Unlike Level 3 Risk status, VB is not required to immediately undergo and pay for QA activities to evaluate performance. VBs can choose to pay for QA to expediate the QA process to update or improve scores more quickly.

26.7.4.1 Fees and procedures are the same as above should VB choose to purchase QA to expediate the QA process to update or improve scores more quickly.

26.8 Level 1 Risk

26.8.1 No communication is made for VBs with Level 1 Risk status.

26.8.2 The VOO monitors the VB in this category closely and may add risk-based QA activities.

26.9 Appeals

26.9.1 A VB can appeal a suspension.

26.9.2 The appeal will be referred to the SLCP secretariat and handled according to SLCP's dispute procedures contained in the [Governance Document.](#)

26.9.3 Re-activation after Suspension

- 26.9.3.1 VB will remain suspended for 12 months.
- 26.9.3.2 After 12 months VB can reapply to be a VB.
- 26.9.3.3 If the application is approved, VB is subject to a full VB Assessment and associated fee regardless of APSCA status.

## **Corrective Action Requests & Plans**

### **27. Corrective Action Requests**

- 27.1 Corrective Action Requests (CARs) are issued by the VOO to the VB if the VOO identifies VB quality and integrity issues.
  - 27.1.1 CARs may be issued as a result of:
    - 27.1.1.1 Activities outlined in the QA Manual
    - 27.1.1.2 Complaints
    - 27.1.1.3 Failure to meet the VB requirements outlined above
    - 27.1.1.4 Determination of a Level 2 or 3 risk
    - 27.1.1.5 Other Verifier or Verifier Performance issues
  - 27.1.2 Formal CARs may not be issued for all quality issues. In some cases, the VOO may notify VBs of a quality issue but not require a Corrective Action Plan (CAP).
  - 27.1.3 The CAR will identify the specific issue and the evidence required to address the CAR.

### **28. Corrective Action Plans**

- 28.1 VBs shall provide their CAP to the VOO within 14 days of receiving the CAR.
  - 28.1.1 Minimally, a CAP shall include:
    - 28.1.1.1 Containment Action (as applicable)
    - 28.1.1.2 Root Cause Analysis Results
    - 28.1.1.3 Action Plan
    - 28.1.1.4 Timeframe
    - 28.1.1.5 Criteria for Measuring Success
- 28.2 The CAP is reviewed and approved by the VOO within 7 days of receipt.
- 28.3 If the CAP is not approved by the VOO, the VB shall develop an improved CAP.
- 28.4 VBs shall provide evidence of implementation of their CAP within 90 days of receipt of approval of the CAP. The VOO evaluates implementation, checks for closure, and provides feedback to VB.
  - 28.4.1 Based on the submittal of evidence, the VOO may:
    - 28.4.1.1 Close the issue: This means the evidence was sufficient to indicate the criteria for remediation were met.
    - 28.4.1.2 Defer to the next VB Assessment: The review of the evidence provided by VB was not sufficient to indicate the criteria for remediation were fully met. The issue will be evaluated more fully as part of next VB Assessment.
- 28.5 If the VB does not follow the requirements for corrective action the VOO will implement the following:
  - 28.5.1 Warning (90 days): If the VB does not submit a CAP within 90 days of the CAR being issued, the VB will receive a written warning explaining perceived gaps in the VB management system and expectations for corrective actions.
  - 28.5.2 Deactivation (120 days): If the VB does not develop and implement a CAP in response to the 90-day warning, the VB will receive a written notice outlining the deactivation of new activity. The VB will be allowed to complete any verification already assigned and in progress but cannot assign Verifiers to any new verifications.



- 28.6 Suspension: If the VB does not develop and implement a CAP in response to the 120-day deactivation, the VB will be suspended in the system for a minimum of 12 months.
- 28.7 To remove a suspension due to non-compliance with CAP requirements, VBs shall undergo a reassessment after the suspension period has expired.
- 28.7.1 The cost of a reassessment is US\$1,000 and VBs are responsible for covering this cost.
- 28.7.2 Reassessments will be conducted by the VOO on a timeframe that is suitable for the VB. Once the VB indicates all gaps in their management system have been addressed, the VOO will complete the reassessment within 30 days.

## **Observations of Verifications by Interested Stakeholders**

### **29. Procedures for Observations of Verifications**

- 29.1 VBs shall have policies and procedures around observation to ensure the observation does not impact the outcomes of the verification.
- 29.1.1 The VB policies and procedures shall address at minimum:
- 29.1.1.1 The observer may not interfere with the verification in any way.
- 29.1.1.2 The observer shall not actively participate in the verification.
- 29.1.1.3 The observer shall not provide guidance or recommendations to the Verifier or facility.
- 29.1.1.4 The observer shall not ask the facility questions about their compliance with standards (e.g., the brand's Code of Conduct/requirements).
- 29.1.1.5 The observer shall not interpret questions in the SLCP Data Collection Tool.
- 29.1.1.6 The observer shall not provide guidance or recommendations to the Verifier or facility.
- 29.1.1.7 The observer shall not ask the facility questions about their self-assessment data.
- 29.1.1.8 Observers are not permitted to observe any portion of worker interviews that count toward the minimum number of interviews required as per the Verification Protocol.
- 29.1.1.9 The facility shall agree to the observation in advance of the verification.
- 29.1.1.10 The Verifier may ask the observer to terminate the observation if they feel it is impacting the verification.
- 29.1.1.11 An observer is an individual not directly associated with the facility or the Verifier Body. Examples are facility business partners (brands, buyers, agents) and representatives from compliance/accreditation schemes.
- 29.1.2 VBs shall communicate these policies and procedures to observers in advance of the observation.
- 29.2 VBs shall work to ensure that the presence of observers during the verification does not impact the impartiality of the verification. Observers should look for any indication that their presence is having an impact, such as the facility trying to persuade a Verifier to enter specific data. If at any time the Verifier feels the presence of the observer is impeding their ability to conduct an impartial verification, the Verifier may ask the observer to leave.

## **Ethics and Integrity**

### **30. Ethics and Integrity Procedures**

- 30.1 VBs shall have a professional Code of Conduct that covers ethics, integrity, and impartiality.
- 30.2 Verifiers shall receive and understand the Code of Conduct.
- 30.3 VBs shall provide annual training on ethics and integrity.

30.4 VBs shall have procedures that address:

- 30.4.1 How Verifiers can raise concerns about ethical issues, including when a facility offers a bribe or acts unethically.
- 30.4.2 How facilities can report on instances where Verifiers solicit or accept bribes or act unethically.

### **31. Impartiality**

- 31.1 The VB shall have a policy that it understands the importance of impartiality in carrying out its verification activities, manages conflict of interest and ensures the objectivity of its verifications.
- 31.2 VBs shall undertake regular assessments of threats to impartiality and of the conflicts of interest that arise when providing SLCP services. Conflicts of interest can arise from a VB's relationship with its clients and unrelated bodies or from its relationship with related bodies.
  - 31.2.1 For each SLCP verification a VB undertakes, they shall ensure there are no conflicts of interest that arise from a past or present relationship between the facility and the Verifier(s) and/or VB.
- 31.3 The VB shall document all possible conflicts of interest that relate to provision of SLCP services and make this documentation available to SLCP and/or the VOO.
- 31.4 VBs shall be able to demonstrate how they eliminate or control any threats to impartiality or conflicts of interest.
- 31.5 Notwithstanding any internal prohibitions based on risk assessment and policies that may be stricter, if a Verifier engages in consulting work (including but not limited to advisory and training services) at a facility, they are prohibited from conducting verifications at that facility for a period of 2 years.

## **Provision of External SLCP Training**

### **32. Facility Training**

- 32.1 VBs may not provide external training to facilities on SLCP unless they are a Training Body for SLCP.
- 32.2 VBs that wish to provide external training to facilities should [contact SLCP](#) for a Training Body application.

### **33. Other External Trainings**

- 33.1 If VBs provide external trainings on SLCP to Verifiers, brands and other stakeholders that are not facilities, they shall ensure the information on SLCP is accurate and up to date.

## **Payment of SLCP Fees**

### **34. VB Fees**

- 34.1 By signing the SLCP Verifier Body Agreement, VBs commit to paying all applicable fees (e.g., Verifier Access Fees and Verification Upcharge Fees).
- 34.2 As noted in the Agreement, failure to comply with the commitments can result in immediate termination of the VB approval.
- 34.3 Current SLCP fees are maintained [here](#). Any fees related to Quality Assurance and Verification Oversight are either mentioned in this document or in the QA Manual.
- 34.4 Payment terms for all SLCP invoices are net 30 days.
- 34.5 Invoices for fees are issued by SLCP to the VB head office (the main point of contact for the SLCP program). SLCP does not split invoices or issues invoices to a VB's regional office.

### **35. Penalties for Non-Payment**



35.1 SLCP will issue payment reminders for all invoices not settled within 30 days. SLCP will inform the Verification Oversight Organization (VOO) if a VB fails to pay their invoice on time and will continue to update the VOO until payment is received. The VOO monitors non-payment of fees and implements the following penalties:

- 35.1.1 Invoice unpaid after 90 days: the VOO issues the VB a warning that failure to pay will result in deactivation of the VB.
- 35.1.2 Invoice unpaid after 120 days: the VOO informs the VB that they have been deactivated. At this time, the VB can complete already assigned verifications but will not be permitted to be selected for new verifications.
- 35.1.3 Invoice unpaid after 150 days: the VOO informs the VB that they are suspended for a period of 12 months.
- 35.1.4 Repeat late payment of fees: VBs that consistently pay SLCP invoices late (if two or more invoices are not paid within 60 days) are subject to a warning and at risk of termination if further invoices are not paid on time.

**Annex 1.: Flowchart of Integrity Oversight Program**

