Social and Labor Convergence Program (SLCP) Verifier Guidance Version 1.6-1.0*

2 August 2024

This Verifier Guidance applies to Version 1.6 of the Converged Assessment Framework. This document provides the Verifier with the information necessary to successfully navigate and complete the Tool in Verifier Mode.

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

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

The file should be viewed in conjunction with the other elements of the CAF relevant for Verifiers and Verifier Bodies: <u>Data Collection Tool</u> and <u>Worker Engagement Question Set</u>, Verification Protocol, as well as the QA Manual.

*Version 1.0 of the Verifier Guidance for CAF v1.6





Change Log

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

Date	Section	Change Summary
2022/12/06	Versioning	Updated CAF Version Version 1.0 of the Guidance for CAF v1.5, hence Version 1.5-1.0
2022/12/06	Relabeling of existing fields in the Tool changes all reference to fields in Verifier Guidance	Table introduced under 1.7. What is new for CAF v1.5? – "1.7.3. Relabeling of existing fields in the Tool" to show the relabeling of existing fields from v1.4 to v1.5. Changes are also applied throughout document. Changes are: • v1.4 "Response" changes to v1.5 "Facility Self/Joint-Assessment Response" • v1.4 "Verification Selection" changes to v1.5 "Assessor/Verifier Selection" • v1.4 "Assessor/Verifier Response" changes to v1.5 "Assessor/Verifier Response" • v1.4 "Verification Data" changes to v1.5 "Assessor/Verifier Explanation"
2022/12/06	Glossary updated	Glossary adapted to include Full Virtual Verification and Worker Engagement elements
2022/12/06	Acronym list updated	Acronym list adapted to include Full Virtual Verification and Worker Engagement elements
2022/12/06	Section 1.7: New Features for CAF 1.5	This section introduces the main elements new to CAF v1.5, specifically: Validation Method Selection Validation Method Shown to SLCP Data End Users Relabeling of existing fields in the Tool New questions added for Verification/ Assessment Details (APSCA Member ID and VD-VERI-19) Country specific questions Overall change in structure of the Verifier Guidance
2022/12/06	Restructuring of Guidance to make more applicable for both online and offline Tools with some specific reference to offline but also provision of a link to the offline Tool tutorial.	Main sections are: Section 1: Introduction Section 2: The Tool Section 3: How to Complete the Tool Section 4. Full Virtual Verification Section 5: Verifier Body/ Verifier Quality Review Appendices Section headings have changed, and new section added for Full Virtual Verification
2022/12/06	Tables of examples for each subsection under Section 3	Tables are provided in the subsections of Section 3: How Do I Complete the Tool which provide examples for the Verifier on how to proceed within the context of each subsection. Tables are consistent format across all subsections for each of navigation. These examples provide additional detail to the Verification Protocol guidance.
2022/12/06	Appendices added	Appendix I provides a sample agenda for the opening and closing meeting Appendix II provides a sample of a verification plan for Virtual + Onsite Verification and Full Virtual Verification
2022/12/06	Section 4: Full Virtual Verification	Complete new section to the Verifier Guidance providing the Verifier with information on: Facility eligibility Verifying facility eligibility Special requirements for verifying Full Virtual Verification Worker Engagement Question Set Important requirements for the use of the WE Question Set during verification Training requirements for Full Virtual Verification
2023/05/01	Versioning	Version number on title page and in all footers. Version number changed from v1.5-1.0 to v1.5-1.1
2023/05/01	Section 1.5 Ethical Behavior Section 2.3.9. Verification/Assessment Observations	Revision to reference to VD-VERI-19 for unethical behavior. Details must now be entered into VD-VERI-18 not VD-VERI-19. Changed to read, " Verifier is required to enter details into VD-VERI-18: Cooperativeness of facility, after selecting "Yes" for the question [VD-VERI-19]"
2023/05/01	Glossary and section: 1.1. Overview of the Converged Assessment Framework	Replaced the link to the Facility Guidance with two different links. One link provided is specific to the CAF: https://slcp.zendesk.com/hc/enus/sections/360005179434-Converged-Assessment-Framework-CAF- and the other link

		accesses information related to training, registration on the Gateway, completing a self-assessment, verification, data sharing and other more general questions.
2023/05/01	Section 2	Maximum number* of questions in each Step Updated numbers (mistakes in previous version)
2023/07/25	Entire document	Links to SLCP document resources updated to correct broken links/ outdated links.
2024/08/02	Versioning	Updated CAF Version Version 1.0 of the Guidance for CAF v1.6, hence Version 1.6-1.0
2024/08/02	1.5 Ethical Behavior	Redirected reader to new options added in Verification/ Assessment Details to record issues related to Integrity/ Honest Data. Emphasis on the fact that the new response options are in addition to, and not replace of, the Confidential Information Report Form.
2024/08/02	1.7 New Features for CAF v1.6	New section outlining the new features for CAF v1.6. Specifically: Verification / Assessment Details Improvements throughout different sections of the Tool (revisions, additions and deletion of questions) Updates to the More Info for FP-BAS-27 question of the Tool - Worker Engagement Facility review of verified assessment report - removal of Accredited Host 'automated clocks' for status change.
2024/08/02	Box 1	Addition of Box 1 explaining what is and what is not considered Denied Access within the SLCP context.
2024/08/02	Box 2	Addition of Box 2 explaining how to address situations of Denied Access.
2024/08/02	2.1 Sections and Subsection of the Tool	Revised count for all sections of v1.6 the Tool except for "Termination" which remains the same.
2024/08/02	2.2.5 Follow up questions	Revision to example of Tool question that has been revised for v1.6.
2024/08/02	2.3.4 The Use of Colors in Sections of the Tool other than Facility Profile 3.1 How do I accurately complete the Assessor/ Verifier Selection Fields?	Clarification added to "Inaccurate – Incorrect" and "Inaccurate – Misunderstanding"
2024/08/02	2.3.9 Verification/ Assessment Details	Screen grab to show new and updated Verification/ Assessment Details of the Tool
2024/08/02	2.4.2 Uploading the offline Tool and attachments to the AH platform for completion	Revision to reference to question asking to upload any photos unrelated to any specific question (VD-VERI-25) to align with revisions for v1.6 of the Tool
2024/08/02	Table 1: Requirements for Completion of Verification Fields	For column Assessor/Verifier Explanation new entry: NEVER BLANK For 195 specific keys that appear in the Tool (even if no response provided). See Appendix III and Section 3.2 for more information.
2024/08/02	Section 3.2 What is the Assessor/Verifier Explanation field and why is it relevant?	Revised the entire section to include details on: a) relevance of data narrative b) new requirements on data narrative and c) automated checks conducted in the Assessor/Verifier Explanation field to identify errors.
2024/08/02	3.3. How do I identify and explain when a facility is not in line with legal requirements?	Clarification on Non-compliance referencing both national regulation and International Labour Standards.
2024/08/02	3.3.1 Examples of when to provide Assessor/ Verifier Explanation for Accurate responses	References to example questions updated to reflect changes in v1.6 of the Tool.

2024/08/02	3.3.3 Examples of Legal Reference Questions	Updates to examples of questions to reflect revisions to v1.6 of the Tool.
2024/08/02	3.10 How do I verify worker engagement in the facility?	Update to question number for worker engagement to reflect updates to v1.6 of the Tool.
2024/08/02	Terms of Use	Updated links to New CAF Terms of Use in Gateway: https://gateway.slconvergence.org/terms/2024-01-31_CAF_License_3.1
2024/08/02	Appendix III	List of the 195 highly relevant keys

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Terms of Use

Visit the SLCP Gateway for the CAF terms of use.

Pay special attention to:

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

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

Glossary

Accredited Host

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

Active Accredited Host

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

Converged Assessment Framework (CAF)

The Data Collection Tool and verification methodology, developed by SLCP and downloadable from the Gateway. Consists of three elements: 1. Data Collection Tool; 2. Protocol (Facility, VB/ Verifier); and 3. Guidance (Facility, Verifier).

CAF Assessment Process

The SLCP procedure for implementing the Converged Assessment Framework, starting with self/joint-assessment for facilities, which is then verified by external parties. Verification oversight processes and methodology facilitate data sharing by the facility, Verifier and Accredited Host via the ITC Gateway.

Data Collection Tool or "Tool"

The 'Questionnaire' used to gather data on working conditions in a facility and used by the Verifier to verify this data. Contains all the assessment questions that a facility must answer through a self/joint-assessment. When completed, includes the answers by the facility and the Verifier. Can be filled in online on an Accredited Host platform or offline (for onsite verification only) via an Excel file downloadable from an Accredited Host. The Worker Engagement Question Set (mandatory for Full Virtual Verification) is a subset of the Data Collection Tool.

Facility Guidance

Online guidance provided to facilities, which is embedded in the SLCP Helpdesk. Different links can be accessed depending on whether the facility is inquiring about training, registration on the Gateway, completing a self-assessment, verification, data sharing or more general questions: https://slcp.zendesk.com/hc/en-us/categories/360000972694-l-am-a-Facility, or if the facility is inquiring about the Converged Assessment Framework (CAF) more specifically: https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF

Full Virtual Verification (FVV)

The entire SLCP verification is conducted virtually due to situations of force majeure that restrict the ability of the facility to conduct onsite verification activities.

FVV Protocol for Facilities

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

ITC Gateway or "Gateway"

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

- 1. Central (and open) resource of Converged Assessment Framework, SLCP process and related information and support material
- 2. Account Management and unique IDs for facilities, VBs and Verifiers
- 3. Management of statuses of the SLCP assessment cycle by continuous updates with each of the Accredited Hosts. Facilities can see the status of their SLCP assessment throughout and at all times.
- 4. Re(distribution) of verified assessments (VRF status) to Accredited Hosts and other ad-hoc users, with facility permission.



Joint-assessment

Facility contracts outside help to fill in Data Collection Tool (CAF).

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

Self-assessment

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

SLCP

Social & Labor Convergence Program (SLCP), an independent multistakeholder program which has developed the Converged Assessment Framework (CAF) and a data hosting and sharing process.

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

Verification Protocol

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

Verified assessment

Verified facility responses resulting from the CAF Assessment Process are generated into a report in pdf, Excel and html format. The verified assessment is made available to facilities and shareable by facilities on the ITC Gateway.

Verifier

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

Verifier Body

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

Verifier Guidance

The document that helps Verifiers complete the verified assessment report by giving guidance on how to verify a facility's answers to questions in the Data Collection Tool.

Virtual + Onsite Verification Some parts of the verification are conducted virtually in addition to onsite verification activities.

WE Question Set

The SLCP Worker Engagement (WE) Question Set is a subset of the Data Collection Tool. The Question Set consists of 20 questions aimed at supporting the questions in the Data Collection Tool.

Worker Engagement Service Provider (WE TSP)

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

The <u>WE Question Set</u> is distributed in form of a digital survey to a target sample of facility workers. Completed surveys are automatically uploaded to the service provider, where the anonymous results are aggregated and compiled into an easy-to-read summary report. The report is then disseminated to the



facility and the VB/ Verifier by the Service Provider in a standardized format.

Worker **Engagement Technology**

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

Acronyms

AH Accredited Host

APSCA Association of Professional Social Compliance Auditors

ASC Assessment Completed
ASD Assessment Deleted
ASI Assessment Initiated

CAF Converged Assessment Framework

FVV Full Virtual Verification

GW Gateway

ITC International Trade Centre

QA Quality Assurance

SLCP Social and Labor Convergence Program

VB Verifier Body
VBs Verifier Bodies

VOO Verification Oversight Organization

VRC Verification Completed **VRD** Verification Disputed **VRE** Verification being Edited **VRF** Verification Finalized VRI Verification Invalidated **VRP** Verification in Progress **VRQ** Verification Quality Check WE Worker Engagement

WE Tech Worker Engagement Technology

WE TSP Worker Engagement Technology Service Provider

Definition of Terms

Casual workers	Persons who work occasionally and intermittently, and are employed for a specific number of hours, days or weeks. They are not normally entitled to the same terms and conditions of employment as ordinary workers (e.g., they would not usually get sick or holiday leave).
Contract workers	Persons working on/with the facility's product or directly involved in the operations of the facility and who are contracted by agencies, i.e., not under employment contract with the facility. Examples include workers who are at the facility and employed by a third party to do line work or maintenance on machinery. They are not cleaning, security, canteen staff or other staff not working on facility product or activities related to production. Those workers are non-production workers.
Domestic migrant workers	Persons who moved from their hometown for work in another town located in the same country, i.e., persons whose hometown is not the town where the facility is located. A worker is a domestic migrant if they live in place X for work but their permanent home where their family resides is in place Y. However, if the location of the facility is considered 'home' then the worker would not be considered a domestic migrant.
Foreign migrant workers	Persons who moved from their home country for work in another country, i.e., persons whose home country is not the country in which the facility is located.
Full-time workers	Persons employed by the facility whose normal hours of work are 40-48 regular hours of work per week.
Law Overlay	The Tool (offline and online) has information in the section introductions that address international labor standards applicable to that specific section/ subsection topic. This is Law Guidance specific to international labor standards only.
	The Law Overlay is both the Law Guidance by country and the automatic entry of Non-Compliance and Legal Reference according to the Final Response in the Verification Summary.
	The Final Response is the Facility Self/Joint-Assessment Response if Accurate, or the Assessor/Verifier Response and Assessor/Verifier Explanation by the Verifier if the Facility Self/Joint-Assessment Response is Inaccurate – Incorrect or Inaccurate - Misunderstanding.
	On the AH platform, the users (facilities and Verifiers) will see a Law Guidance link (similar to More Info). When they go to that info box, they will see Law Guidance information about country specific legal requirements specific to that question. If Law Guidance at question level is implemented, then the automatic entry of Non-Compliance and Legal Reference is also implemented. The Law Overlay is both the Law Guidance field (country- and question-specific) and automatic entry of Non-Compliance and Legal Reference together as a package.
	See more information here.
Non- production workers	Persons not involved in the production of goods and in operations related to the product, e.g., distribution. Non-production workers include security guards, canteen workers and cleaners.
Part-time workers	Persons employed by the facility whose normal hours of work are less than those of comparable full-time workers. For statistical purposes, part time is typically defined by a specified number of hours. The threshold which divides workers into full-time and part-time workers varies from country to country but is usually either 30 or 35 hours per week.
Permanent workers	Persons hired on an open-ended/ indefinite/ permanent basis.
Production	Applies to all operations in a facility, since many facilities are not directly involved in "production" per se, (i.e., distribution centers, warehouses, etc.).

Supervisors	Persons who lead or supervise others and who work on the production floor (not in the office, e.g., line leaders, group leaders, and department heads, but not managers.
Temporary workers	Persons who are hired for a specific time, or to complete a specific task or project that is limited in duration. Limited duration can be specified in days, weeks, months, or years. Temporary workers are different than casual workers (see definition for casual workers above).
Workers	Persons working on/with the facility's product, ensuring machinery is working to produce product, or directly involved in the operations of the facility. They are non-supervisory, which means no one report to them (if a person is in a supervisory role, e.g., sewing line group leader, they would not be counted as "worker"). Facilities include those involved in production of goods, and also those involved in operations related to the product, e.g., distribution. Examples of "workers" are cutters, sewers, QC, packers, etc. (all workers who contribute to producing the product), boiler workers, mechanics (machine repair persons), electricians and workers who load product onto trucks.

1. Introduction

1.1. Purpose of the Verifier Guidance

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

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

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

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1.2. Overview of the Converged Assessment Framework (CAF)

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

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

You can access all CAF files on our Helpdesk.



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

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

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

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

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

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1.4. Data Integrity

Your role as a Verifier to ensure data integrity

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

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

SLCP Quality Assurance Manual

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

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1.5. Ethical Behavior

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

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

If the facility engages in unethical behavior, the Verifier is required to **select the appropriate options** available under the "Integrity / Honest Data" set of questions in Verification / Assessment Details of the Tool. Please see section 1.7 New Features for CAF v1.6 for a detailed list of Integrity / Honest Data questions now available in the Verification / Assessment Details section of the Tool.

Only confirmed details must be reported in response to the Integrity / Honest Data questions. The questions are grounded in the SLCP CAF Terms of Use, which states, "Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users." The SLCP Signatory



Charter also calls for signatories to "respect the principle of true data in SLCP verified assessments by recording and accepting honest data, and by prioritizing remediation over punishment". Facilities should thus report actual conditions and be transparent about any non-compliance with applicable legal requirements or facility practices like double bookkeeping.

Important: The new questions do not replace the submission of the <u>Confidential Information Report Form</u>. If any of the <u>Integrity / Honest Data</u> questions are applicable, i.e., the facility is being dishonest, the Verifier must complete the <u>Confidential Information Report</u> in addition to providing details in the <u>Verification / Assessment Details of the Tool</u>. Unlike the information entered into Verification / Assessment Details, the online form is not visible to the facility but internal to SLCP and is shared in confidence with applicable approved VBs and Verifiers (please see 1.6 below for further details).

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

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1.6. Reporting Issues outside Final Verified Assessment Report

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

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

- Reported information will be kept internal to SLCP and may be shared in confidence with applicable approved VBs and Verifiers.
- Applicable information will be maintained on a private facility profile visible to SLCP, the VOO and any VB assigned a verification for the applicable facility.
- Even if the Verifier was able to include the sensitive information in the verified assessment report
 and the facility let the report be published, it is important to also use this form to highlight the
 issue separately in a facility profile for the next Verifier Body/ Verifier, because the
 previous report is not always shared.
- The information may come from the verification and Verifier directly, or through other means like worker hotlines that the VB maintains. It may be information from the self-assessment or verification timeframe or information outside of the assessment timeframe.
 - If the Verifier Body has their own worker hotline as part of their service offering and is permitted to share the information with the VOO and SLCP, please share via the form (information is welcome at any time, not only during or shortly after verification)

1.6.1. Examples

	EXAMPLES: Sensitive issues and suspicious activities	
1.	Sensitive information that could not be shared because the Verifier has to keep the identity of the worker confidential to protect from retaliation.	
2.	Information of non-compliances or inaccuracies that could not be shared because they were outside of the assessment scope timeframe.	
3.	Unverified interview statement or inability to properly triangulate a finding, which: - Would result in an "Inaccurate - Incorrect" determination, but unconfirmed so cannot be applied - Indicates a potential legal issue or non-compliance to generally accepted codes of conduct (e.g., unconfirmed reports of verbal abuse, harassment)	
4.	Transparency or ethics issues, such as: Facility offers a bribe to Verifier and Verifier cannot include this information in the report Unconfirmed concerns of facility not sharing accurate data, like maintaining double books or falsified records Suspicion of interview coaching, hiding workers/ production, or other manipulation of the verification	



5.	Suspicion of zero tolerance conditions (on day of verification or within assessment timeframe) like forced labor, human trafficking, hiding presence of ethnic minorities, child labor, etc. Apply your auditor knowledge of zero tolerance issues mentioned in codes of conduct and/or certification programs.	
6.	Facility management is obstructive or unprofessional	
Pos	Possible scenarios	
1.	The week after the self-assessment was closed a worker was not paid overtime wages, there is no other non-compliance on OT wage payments in the assessment timeframe, and the facility does not want the finding included in the Assessor/Verifier Explanation.	
2.	During walkthrough the Verifier notices workers diverting their gaze, keeping their heads down and moving away from the areas of focus. The facility has a complaint mechanism for workers but there are zero complaint records. Management ignores workers and become dismissive and agitated if workers are too close to the Verifier.	

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1.7. New Features for CAF v1.6

1.7.1. The new and improved Verification / Assessment Details section of the Tool

The Verification / Assessment Details section has been improved to help the Verifier provide more specific information on verification processes.

The table below shows the updated Verification Assessment Details section of v1.6 of the Tool. Some questions have been revised from v1.5 to v1.6 (black) and other questions are new for v1.6 (red). One question has been removed and appears in grey.

Number	VERIFICATION / ASSESSMENT DETAILS		
VD-VERI-15	Worker Interviews: What is the total number of interviews conducted with contract workers/ workers employed by third party who are not part of the production process?		
VD-VERI-16	Worker Interviews: Provide details about number and type of workers interviewed:		
VD-VERI-17	Management Interviews: Provide the titles of the management staff interviewed, as well as the titles of senior management who attended the opening and/or closing meetings:		
	Physical Scope Covered:		
VD-VERI-18	How many onsite dormitories were visited? (provide total)		
VD-VERI-19	How many off-site dormitories were visited? (provide total)		
VD-VERI-20	Did the Assessor/ Verifier visit all applicable canteens (onsite and off-site managed by the facility)?		
VD-VERI-21	Cooperativeness of facility: The intent of this observation topic is to understand how cooperative and honest the facility was during the engagement and how involved the management was. At minimum, provide details on:		
	Was facility management attitude positive or negative?		
	How did the facility react to any negative findings?		
	Did the facility provide open and honest access to all required documentation, facility spaces, personnel, workers, etc. as asked by the Assessor/Verifier?		

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	Integrity / Honest Data ¹ :
VD-VERI-22	Which of the following behaviors impacting integrity/ honest data did the facility engage in? (SELECT all that apply with an "X"):
VD-VERI-22-1	Bribery
VD-VERI-22-2	Coaching of workers
VD-VERI-22-3	Falsification of payroll records
VD-VERI-22-4	Falsification of pay slips
VD-VERI-22-5	Falsification of working hours records
VD-VERI-22-6	Falsification of age records
VD-VERI-22-7	Falsification of personnel files
VD-VERI-22-8	Falsification of other records (not incl. payroll, pay slips, working hours, age, personnel records)
VD-VERI-22-9	Denied access to workers
VD-VERI-22-10	Denied access to trade union representative (if applicable)
VD-VERI-22-11	Denied access to worker representative (if applicable)
VD-VERI-22-12	Denied access to documentation
VD-VERI-22-13	Denied access to facility areas
VD-VERI-22-14	Other behavior impacting process integrity
VD-VERI-22.1	If other, please describe:
VD-VERI-22-15	Facility did not engage in any behavior that impacted process integrity/ the sharing of honest data
VD-VERI-19	Note: this v1.5 question has been removed:
	Did the facility engage in behavior that impacts process integrity (e.g., incomplete,
	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?
VD-VERI-23	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to
VD-VERI-23 VD-VERI-24	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?
	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices
VD-VERI-24	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly
VD-VERI-24	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question?
VD-VERI-24 VD-VERI-25	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide
VD-VERI-24 VD-VERI-25 VD-VERI-26	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"):
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1 VD-VERI-26-2	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records)
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1 VD-VERI-26-2 VD-VERI-26-3	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records) Working Hours records
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1 VD-VERI-26-2 VD-VERI-26-3 VD-VERI-26-4	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records) Working Hours records Receipts of Social Security remittance / payments to appropriate public agencies None of the above (all listed documentation was provided and none of the provided documentation was falsified) Payroll: How many workers were sampled?
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1 VD-VERI-26-2 VD-VERI-26-3 VD-VERI-26-4 VD-VERI-26-5	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records) Working Hours records Receipts of Social Security remittance / payments to appropriate public agencies None of the above (all listed documentation was provided and none of the provided documentation was falsified) Payroll: How many workers were sampled? Payroll: Of the workers sampled, how many workers received less than the minimum wage?
VD-VERI-24 VD-VERI-25 VD-VERI-26-1 VD-VERI-26-2 VD-VERI-26-3 VD-VERI-26-4 VD-VERI-26-5 VD-VERI-27	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records) Working Hours records Receipts of Social Security remittance / payments to appropriate public agencies None of the above (all listed documentation was provided and none of the provided documentation was falsified) Payroll: How many workers were sampled? Payroll: Of the workers sampled, how many workers received less than the minimum wage? Payroll: What percentage of the sampled workforce was impacted?
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1 VD-VERI-26-2 VD-VERI-26-3 VD-VERI-26-4 VD-VERI-26-5 VD-VERI-27 VD-VERI-28	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records) Working Hours records Receipts of Social Security remittance / payments to appropriate public agencies None of the above (all listed documentation was provided and none of the provided documentation was falsified) Payroll: How many workers were sampled? Payroll: Of the workers sampled, how many workers received less than the minimum wage? Payroll: What percentage of the sampled workforce was impacted? Working Hours Records: How many weeks were sampled?
VD-VERI-24 VD-VERI-25 VD-VERI-26 VD-VERI-26-1 VD-VERI-26-2 VD-VERI-26-3 VD-VERI-26-4 VD-VERI-27 VD-VERI-28 VD-VERI-29	inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)? Management Practices: Strengths of management practices Any other comment Are there any photos you would like to add to the verification that did not directly correspond to a question? Documentation Review: Which of the following documentation for verification did the facility fail to provide access to? (SELECT all that apply with an "X"): Age records Payroll (Wage records) Working Hours records Receipts of Social Security remittance / payments to appropriate public agencies None of the above (all listed documentation was provided and none of the provided documentation was falsified) Payroll: How many workers were sampled? Payroll: Of the workers sampled, how many workers received less than the minimum wage? Payroll: What percentage of the sampled workforce was impacted?

¹ <u>Important</u>: if any of the <u>Integrity</u> / <u>Honest Data</u> questions are applicable, i.e., the facility is being dishonest, the Verifier must complete the <u>Confidential Information Report Form</u> in addition to providing details in the Verifier/ Assessor Explanation.



VD-VERI-33

the sampled workforce was impacted?

QA/Report Reviewer Name (First Initial and Last Name):

Please see Box 1 & 2 below for details on "Denied Access" and how to address situations of Denied Access (questions VD-VERI-22-9 – VD-VERI-22-13 of Verification/ Assessment Details) within the SLCP context.

Box 1: What is considered Denied Access?

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

- 1) Considered Denied Access: If the facility does NOT make note of a physical exclusion (part of the building attached to the business license (process, building, room, worker line)) from the selfassessment in the Facility Comments of the Facility Profile sections; and the self-assessment DOES include data to verify the excluded part; but the facility does not permit access to the Verifier during verification. In such a case, the Verifier must remind the facility:
 - Of their agreement to abide to the CAF Terms of Use when they set up their profile on the Gateway, specifically the clause: Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, Verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users
 - Of the purpose of SLCP (data collection and data sharing). It is in the facility's interest to have the most complete set of verified data for sharing
 - That if the Verifier cannot verify the data, the Assessor/Verifier Selection will be "Inaccurate Incorrect", affecting the Accuracy Index of the report.

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

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

2) NOT considered Denied Access: If the facility makes note of a physical exclusion (part of the building attached to the business license (process, building, room, worker line)) from the self-assessment in the Facility Comments of the Facility Profile sections and the self-assessment does not include data to verify the excluded part, then the Verifier approaches the verification as usual, only verifying the scope of the facility as noted in the self-assessment. This is not considered Denied Access.



Box 2: How to address situations of Denied Access

- Select "Inaccurate Incorrect" for the Facility Self/Joint-Assessment Response related to the physical area or process to which the Verifier is being denied
- In the Assessor/Verifier Explanation of "Inaccurate Incorrect":
 - address the rest of the facility they were able to assess and comment on those conditions (positive or negative)
 - make note of the denied access to each specific data point that is affected. The notation, if applicable, can be copy pasted in multiple Assessor/Verifier Explanation cells.
- Select the appropriate response for questions VD-VERI-22-9 to VD-VERI-22-13 "Verification/Assessment Details":
 - attach any policy/ procedure (upload on AH site) the facility must explain the denied access (e.g., if the denied access is due to confidentiality, intellectual property)
 - ask the facility if they have had another party assess social or EHS compliance of that specific area and attach the latest report to the Verification/Assessment Details as attachment (upload on AH site)
- Verifier should strive to be able to answer as many questions as possible through other means if Access is Denied, e.g.:
 - If access is denied due to confidentiality, workers may be accessible for interview. If the facility included those workers in the denied access area in the facility self-assessment (the affected workers are in the facility worker count in the Facility Profile section), then the Verifier can ask workers questions about, for example, free access to potable water, toilets, and coming and going out of the restricted room.
 - Even though a specific area is denied access, the fire safety permit/ building permit, etc. would include that specific part of the facility. Verifier can make note of the permit as per the data point and note in Assessor/Verifier Explanation (even if Accurate) that the area of denied access is included in the permit.

1.7.2. Improvements throughout different sections of the Tool

To improve the consistency, flow, logic and clarity of the Tool, new categories, questions, and answer options have been added throughout the entire CAF v1.6 Tool. Other questions have been moved between sections, and some questions have been rephrased. The table below shows a summary of the changes made throughout the Tool. See also our Helpdesk for more resources on the changes in CAF v1.6.

Section(s)	Summary of changes
Facility Profile Industry Sector	 New options (see Tool). Deleted option: Home Furnishings Updated option: Sports & Outdoor - Hard goods
Facility Profile Industrial Activities (NEW category) Industrial Activities replaces "Facility Type" New options (see Tool) Deleted options: Footwear / Leather goods; Printing or Dyeing; Materials Supplier.	
Facility Profile Building Structures Sub-Section	 New keys (Off-site Housing) New category (Off-site Canteen)
Facility Profile Social Audits and Certifications	New certification standards added GOTS - Global Organic Textile Standard GRS - Global Recycling Standard ICS - Initiative for Compliance and Sustainability

Working Hours Wages & Benefits Recruitment & Hiring	Questions moved between sections (keys not deleted, only moved)				
Working Hours (Step 2) Sub-Section Overtime	 New category: Exceptional Circumstances (to help show impact on workers when production/volume is lower than expected) New keys: Exceptional Circumstances 				
Wages & Benefits	 New category: Wage Data Lowest, Wage Data Most Representative, bonuses provided to workers by facility New keys: Social Insurance / Social Security; Wage Data Lowest*, Wage Data Most Representative*, bonuses provided to workers by facility * Requires Verifiers to check the validity of the calculation and be able to follow the calculation 				
Health & Safety (Step 2)	 New category: Heat/Cold Stress New answer options: added for keys in category of Hot Work 				
Worker Involvement	New answer option for keys related to Freedom of Association and Collective Bargaining, specifically related to Trade Unions: "Not applicable. No union presence in the facility during assessment period."				
	Rephrasing of some questions in Step 1 and Step 2				
	pay attention to the change in a sking the opposite. Some ex	n phrasing (e.g., from positive phrasing to negative camples:			
v1.5: (RH-FOR-2-1) Prison laborers have freely consented to perform the work		v1.6: (RH-FOR-2-1) Prison laborers <u>have not</u> freely and formally consented to perform the work			
 v1.5: (RH-FOR-2-2) The facility treats prison laborers and non-prison workers similarly [] 		 v1.6: (RH-FOR-2-2) The facility <u>does not</u> treat prison laborers and non-prison workers similarly [] 			
 v1.5: (WB-WAG-5) Do full-time production workers receive AT LEAST the legal minimum wage (and/or wage required by contract, CBA, or other agreement) for all regular hours worked? v1.5: (WB-WAG-6) Do workers other than full-time production workers receive AT LEAST the legal minimum wage (and/or wage required by contract, CBA, or other agreement) for all regular hours worked? 		 v1.6: (WB-WAGE-4) Is the facility <u>failing to pay</u> any worker AT LEAST the legal minimum wage for any regular hours worked? (WB-WAGE-5) If yes, please select all the categories of workers for which any workers in the category did not receive at least the legal minimum wage: (SELECT all that apply with a "X"). 			

1.7.3. Worker Engagement

For v1.6 (as was the case for v1.5), **FP-BAS-27** asks if the facility involved workers' representatives (e.g., trade union or other workers' representatives, bipartite committee members, worker committee members) or workers in the self/joint-assessment process. The **more info to this question has changed** to help both the facility and Verifier better understand what worker engagement means within the context of SLCP.

The Verifier must still verify and document involvement of worker committee/ worker representative/ trade union representative in the WE Question Set deployment under question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section (see WE Tech sections of this Protocol). However, follow ups to this question have been revised and added to help the facility more clearly report, and the Verifier to better understand, the level of worker engagement undertaken during the SLCP assessment process in the facility.

In the online Facility Guidance on the SLCP Helpdesk (https://slcp.zendesk.com/hc/en-us/articles/6275091462172-SLCP-process-how-is-the-worker-voice-included-in-the-assessment-How-are-Worker-Engagement-Technologies-used-to-gather-data-), SLCP provides information on how to engage workers in the self/joint-assessment process through:

- a) a worker management committee or through
- b) the SLCP Worker Engagement Question Set which is implemented with the help of an



SLCP approved Worker Engagement Technology Service Provider.

SLCP highly recommends involving workers' representatives, including trade union representatives, in the self/joint-assessment process and through this question is assessing whether the facility followed SLCP's recommendation.

The revised/ new questions and more info are outlined in the table below:

Number	Question	More info
FP-BAS-27	Were workers' representatives and/or workers involved in the self/joint-assessment process?	This question is asking if the facility involved workers' representatives (e.g., trade union or other workers' representatives, bipartite committee members, worker committee members) or workers in the self/joint-assessment process. [see above for explanation of online Facility Guidance on the SLCP Helpdesk] Select "Yes. Facility followed SLCP WE Tech Protocol with approved Service Provider." if you: - implemented the SLCP Worker Engagement Question Set AND - used one of SLCP's approved Worker Engagement Technology Service Providers (https://slcp.zendesk.com/hc/en-us/articles/9579732177052-Worker-Engagement-Technology-WE-Tech-Service-Providers-what-is-their-role-Who-are-they-) AND - followed the WE Tech Protocol for Facilities (https://slcp.zendesk.com/hc/en-us/articles/9579962726300-SLCP-WE-Tech-how-does-SLCP-use-worker-engagement-technology-WE-Tech-) to use the Worker Engagement (WE) Question Set results in the SLCP verification activity. Even if you engaged in other activity in addition to the SLCP WE Question Set, prioritize selecting this option. If you select this option, you must also attach your improvement plan you created based on the WE Tech summary report received by the Service Provider. Select "Yes. Facility Guidance on the SLCP Helpdesk was followed." if you chose to follow the Recommendations on the Helpdesk and create a worker management committee and you did not implement the Worker Engagement Question Set. (https://slcp.zendesk.com/hc/en-us/articles/6275091462172-SLCP-process-how-is-the-worker-voice-included-in-the-assessment-How-are-Worker-Engagement-Technologies-used-to-gather-data-) Select "Yes. Other worker engagement activity was implemented." if you engaged in a different activity and did NOT follow the WE Tech Protocol for Facilities and did NOT follow Helpdesk Recommendations. Select "No" if you did not engage in any worker engagement to complete your self/joint-assessment.
FP-BAS- 27.1	If yes, which SLCP approved Service Provider was used?	Go to the SLCP Helpdesk (https://slconvergence.org/helpdesk) to find the names of SLCP approved Worker Engagement Technology Service Providers.
FP-BAS- 27.2	If yes, please enter the unique ID for the project completed with the SLCP approved Service Provider associated with this assessment:	When you implement the SLCP Worker Engagement Question Set with the help of an SLCP approved Worker Engagement Technology Service Provider you will receive a project ID/ survey ID. That ID is unique to the specific project you implemented in conjunction with this assessment. Please enter that ID here. You will get that ID from the applicable SLCP approved Worker Engagement Technology Service Provider.
FP-BAS-	If yes, please	Please indicate the roles of the workers' representatives or workers who

27.3	describe how workers' representatives and/or workers were involved in the self/joint- assessment	were involved in the self/joint-assessment (do not provide names, but rather indicate their representative roles in the facility, e.g., trade union officials, workers' representatives on the xxx committee) and/or the role of the workers involved, e.g., production workers, etc. Please describe details of how workers and/or workers' representatives were engaged in the self/joint-assessment process.
	process:	Attach documentation as applicable.

1.7.4. Facility review of verified assessment report (VRC)

There are no longer any Accredited Host 'automated clocks' to change the status of the verified assessment report as it moves through the SLCP verification process. VBs/ Verifiers and facilities are still required to keep within the necessary timelines to ensure verification is completed within the required time frame, but the facility and Verifier are now responsible for **manually** changing the statuses from VRE to VRC to VRF.

Even though there is no longer an automated feature for status change from VRC to VRF, the facility and Verifier must act quickly throughout this process to meet the overall timelines for verification.

The updated process is as follows:

Verifier has completed the verification and filled in the findings on the AH platform. The facility must review the assessment before **manually changing the status to VRF**. This process is no longer automated. It is the responsibility of the facility to review the report and manually change the status to VRF.

Before having the option to manually change the status from VRC to VRF, the facility must read and accept the terms of submission:

- the facility must acknowledge they have read the verified assessment report,
- the facility has taken advantage of the possibility to edit the report,
- the facility confirms they have no concerns about the report and agree with all data submitted.

Important! Addendums are no longer available. Within 30 calendar days of receiving the assessment report from the Verifier, the facility may <u>Request Edits</u>, <u>Dispute</u> or <u>Accept</u> the report after thoroughly reading and reviewing it. After 30 calendar days, the facility will no longer be able to <u>Dispute</u> or <u>Request Edits</u>, only <u>Accept</u> the verified assessment report or <u>Delete</u> it.



2. The Tool

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

2.1. Sections and Subsections of the Tool

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

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

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

Facility and Verifier Mode Sections and Subsections

Tool Section	Tool Subsection	Total Number of Master Type "Question" (Step 3 scope)
1. FACILITY PROFILE	 Step Selection OAR/ OS ID Basic Information Building Structures Worker Demographics Nationalities Languages Operating Licenses Certifications Production / Operation Information Subcontractors Used for Production / Operation Facility Comments 	309
2. RECRUITMENT & HIRING	 Child Labor Apprenticeship / Trainee / Internship Programs Forced Labor Recruitment Practices Discrimination Employment Practices Homeworkers Facility Comments 	165
3. WORKING HOURS	Working HoursForced LaborOvertimeFacility Comments	71
4. WAGES & BENEFITS	Wages and BenefitsFacility Comments	230
5. WORKER TREATMENT	 Forced Labor Harassment and Abuse Discrimination Discipline Worker Treatment Facility Comments 	162

6. WORKER INVOLVEMENT	Workplace CooperationGrievance SystemsWorker FeedbackFacility Comments	145
7. HEALTH & SAFETY	 General Work Environment Building Safety Risk Assessment HS Policy/ Plan Qualified HS Staff HS Committee HS Worker Engagement Emergency Preparedness Flammable and Combustible Materials Chemicals and Hazardous Substances Worker Protection Materials Handling and Storage Safety Warnings Electrical Safety First Aid and Medical Contractor Safety Dormitories Canteens Childcare Children Facilities Health & Safety Facility Comments 	394
8. TERMINATION	 Forced Labor Employment Practices Discrimination Termination Facility Comments 	39
9. MANAGEMENT SYSTEMS (STEP 2 AND 3 ONLY)	 Plan (Policies & Procedures, Strategy and Goals) Do (Roles and Responsibilities, Communication and Training) Check (Monitoring, Self-Assessment) Act (Continuous Improvement) Facility Comments 	435
10. ABOVE AND BEYOND (STEP 3 ONLY)	Workplace Well-BeingCommunity ImpactFacility Comments	83

FOA & CB



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

Tool Section	Tool Subsection	Number of Questions
11. VERIFICATION / ASSESSMENT DETAILS	 Validation Method Verification/Assessment Dates Verification/Assessment Duration Verification/Assessment Window Verifier/Assessor Information APSCA ID Verification/Assessment Participants Exception Requests Worker Interviews Verification/Assessment Observations 	51
12. VERIFICATION SUMMARY	 Automated information pulling from Verifier answers generated by the Tool with a Verifier click. To facilitate the Closing Meeting and provide the Verifier and facility with a key summary of all "Inaccurate – Incorrect" and "Non-Compliance" items. 	NA

Maximum number* of questions in each Step:

Step 1	973 + country specific questions (Bangladesh; Cambodia; Ethiopia; Indonesia; Pakistan; Viet Nam)	
Step 2	Step 1 (973) + 969 = Total 1942	
Step 3	Step 2 (1942) + 340 = Total 2282	

^{*}Note: this includes all possible keys that require a facility response, so the number of questions will be less depending on actual Facility Responses.

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2.2. Tool Features

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



2.2.1. The Four Parts of the Data Collection Tool

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



- OVERVIEW contains important information on the Tool, including enabling macros, SLCP process information and Terms of Use
- 2) **INSTRUCTIONS** explains how to navigate the file, fill in the required content, select the appropriate Step for assessment completion, and understand the applicable standards, scope and timeframe
- 3) SLCP Data Collection Tool 1.6 contains questions organized into 10 different sections for the facility to complete. The questions that appear depend on what Step has been selected and the answers the facility has provided (e.g., presence of workers under 18, migrant workers, specific operational processes)
- 4) Verification Summary contains a blank table that the Verifier can automatically fill in with "Inaccurate Incorrect" and "Non-Compliance" items by selecting "Click here (no double-click) and wait to create/update Verification Summary" at the very top left corner of the sheet. After the Summary is generated, the Verifier can go back to the SLCP Data Collection Tool 1.4 to make changes and return to the Verification Summary to update it with one click of the link. Hence, the prompt notes "create/update". Double clicking may create an error in the file, so only click once and be patient, especially if the Tool contains a lot of Inaccuracies and/or Non-Compliances.



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2.2.2. The Navigation Bar

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

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



See Verifier Guidance tutorial on how to navigate the offline Tool.

2.2.3. Facility Comments

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

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



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2.2.4. Conditional Questions

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

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

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2.2.5. Follow up questions

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

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

Since all Follow-up Questions have free narrative answers; the Assessor/Verifier Explanation field is sufficient to offer an opportunity for the Verifier to provide the correct information and additional details on the facility's circumstances, if necessary.

For example: "FP-BUI-7: Number of off-site housing sites occupied by workers managed and controlled by an entity other than the facility". If the facility selects a response great than 0 (>0) then a follow up question appears marked by ".1" at the end of the number:

"FP-BUI-7.1: Please provide details of the housing arrangements, including at minimum how many workers are living in the building, who is managing the building and what is the relationship between the facility and the entity providing the housing:"

The facility responds with a free narrative answer. Any correction/ addition made by the Verifier can then be entered into the Assessor/Verifier Explanation field.



2.2.6. Tool "More Info" Guidance

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



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

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

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2.3. The Tool in Verifier Mode

There are five (5) columns that apply to the Verifier during verification of the facility responses. These five (5) columns are next to the Facility Self/Joint-Assessment Response in the Data Collection Tool in Verifier Mode. **Note: the labelling of the fields in the offline Tool differs from those of the online Tool** (see table below):

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

Since the online Tool is the preferred and recommended version of the Tool for onsite verification, and the only available version of the Tool for Virtual + Onsite and Full Virtual Verification, reference to the field labels in the online Tool have been made throughout this document.

2.3.1. Color Guide for Verification Completion

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

Dark Blue: You must complete this field* Light Blue: You do not have to act but you may choose to OR Light Blue: You have completed this field

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

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2.3.2. Using the Colors to Guide You

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

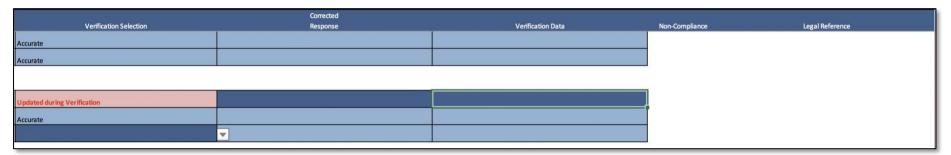
The dark blue cells tell you that you need to select an Assessor/Verifier Selection, which is mandatory for each question in the Tool.

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

2.3.3. The Use of Colors in Facility Profile

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

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



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

Inaccurate-Incorrect / Inaccurate-Misunderstanding [Red]

- You must enter an Assessor/Verifier Response and explain in "Assessor/Verifier Explanation" why the data is inaccurate
- There are now two Inaccurate response options
 - 1. Inaccurate Incorrect (the facility intended to mislead by not sharing accurate data)
 - 2. Inaccurate Misunderstanding (the facility misunderstood the question). **Note**, that the "more info" accompanying Tool questions aims to keep this response option to a minimum.
- When you enter both "Non-Compliance" and "Legal Reference" both cells change to red so you can easily find them to discuss specifics with the facility during the closing meeting.

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



Accurate [Light Blue]

- No need for further action. But you can still determine a Non-Compliance if applicable. If the column is not whited out, you should check for any applicable Non-Compliances according to the defined applicable legal requirements. See 3.3 for details.
- Note: if a non-compliance is applicable, the Verifier must explain in "Assessor/Verifier Explanation" the reason for the non-compliance along with providing the legal reference to the non-compliance in the "Legal Reference" column.
- You can still add information in the Assessor/Verifier Explanation field (even if no non-compliance). It is recommended to do so when relevant. See Section 3.2 The Assessor/Verifier Explanation Field and the Standardized Narrative Template
- What is the Assessor/Verifier Explanation field and why is it relevant?

NOTE: Whenever the term "non-compliance" is used within the CAF (Verification Protocol, Verifier Guidance, Facility Guidance and Protocols) it pertains to both national law and International Labour Standards.

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

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

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

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



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

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

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

No longer applicable due to verification

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

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

Not applicable due to special facility circumstances [Light Blue]

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

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



Verification not Required

Applicable to a few questions where verification is not necessary. It is the only drop-down selection option in the Assessor/Verifier Selection. No Assessor/Verifier Response is applicable (whited out). If the Verifier chooses to add comments under Assessor/Verifier Explanation they can do so, but it is not required. Below is the example of the Facility Comments question. The only Assessor/Verifier Selection option for all the Facility Comments questions is "Verification not Required".



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2.3.5. Completing the Assessor/Verifier Response

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

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



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

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

	Accurate			
x	Inaccurate - Misunderstanding			Inde
	No longer applicable due to verif	ication	_	
x	Accurate	X		Sewers,
	Not visible to facility during SA/J	Α		
		Corrected		
Facility Response (ANSWERS IN ENGLISH ONLY)	Verification Selection	Response	Verification Data	
x	Accurate			
х	Inaccurate - Incorrect		Discrepency between payroll and attendance records d	due to switch
		Corrected		
Facility Response (ANSWERS IN ENGLISH ONLY)	Verification Selection	Response	Verification Data	
	Inaccurate - Misunderstanding	x	Occasionally during peak season/ rush orders to ensure	hours are re





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

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



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

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

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



2.3.6. Verification/Assessment Details

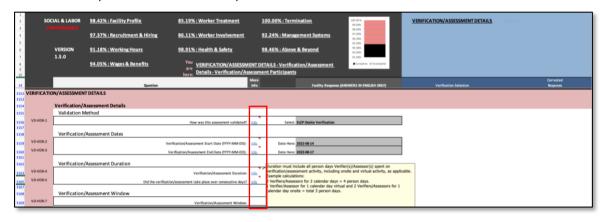
There is a specific section that has to be completed by the Verifier in addition to the verification of the Facility Self/Joint-Assessment Responses. This "Verification/Assessment Details" section is provided when the Tool is in Verifier Mode. Clicking on the link "VERIFICATION/ASSESSMENT DETAILS" will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



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2.3.7. Verification/Assessment Details "More Info"

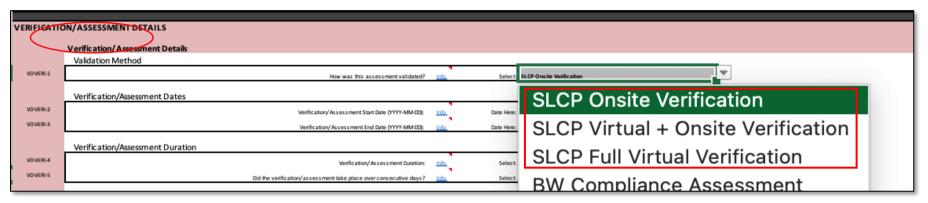
Just like for the Facility Self/Joint-Assessment Responses, each entry in the Verification/Assessment Details section of the Tool has guidance in the form of a "More Info" pop-up box. This guidance provides details and necessary information on how to complete the field. This is important to read! The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





2.3.8. Validation Method (online Tool only)

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



The Three (3) SLCP Validation Methods are:

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



2.3.9. Verification/Assessment Details

Verification / Assessment Details section has been revised in v1.6 to help the Verifier provide more specific information on verification processes related to Integrity and honest data. Questions have been added and are now more specific. The Verifier must select the option that applies to their specific verification processes.

	Worker Interviews	
VD-VERI-14	What is the total number of worker interviews conducted?	Info Number Here:
VD-VERI-15	What is the total number of interviews conducted with contract workers/ workers employed by third party who are not part of the production process?	
VD-VERI-16	Provide details about number and type of workers interviewed:	: Info Response Here:
VD-VERI-17	Management Interviews Provide the titles of the management staff interviewed, as well as the titles of senior management who	
	attended the opening and/or closing meetings: Physical Scope Covered	: Response Here:
VD-VERI-18	How many onsite dormitories were visited? (provide total)	Number Here:
VD-VERI-19	How many off-site dormitories were visited? (provide total)	Number Here:
VD-VERI-20	Did the Assessor/ Verifier visit all applicable canteens (onsite and off-site managed by the facility)?	Info Select:
	Facility Cooperativeness	
VD-VERI-21	1. Cooperativeness of facility	Info Response Here:
	Integrity / Honest Data	
VD-VERI-22		Which of the following behaviors impacting integrity/ honest data did the facility engage in? [SELECT all that apply with an "X"]:
VD-VERI-22-1	Bribery	"X" to select:
VD-VERI-22-2	Coaching of workers	"X" to select:
VD-VERI-22-3	Falsification of payroll records	"X" to select:
VD-VERI-22-4	Falsification of pay slips	s "X" to select:
VD-VERI-22-5	Falsification of working hours records	"X" to select:

Important: if any of the Integrity / Honest Data questions are applicable, i.e., the facility is being dishonest, the Verifier must complete the Confidential Information Report Form in addition to providing details in the Verification/ Assessment Details. The information in Verification/ Assessment Details is visible to the facility; however, the information from the Confidential Information Report Form you submit will not be attributed to you and is not visible to the facility but only to SLCP and other approved VBs and Verifiers who will engage with the facility on verifications in the future.



2.4. Accessing the Offline Excel Tool for Completion

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

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

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

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

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

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

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

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

See our Helpdesk to download these documents.

To learn how to collect the findings with the offline Tool please see this FAQ in SLCP Helpdesk.

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



2.4.1. Opening and Saving the Offline Tool after Download from Accredited Host

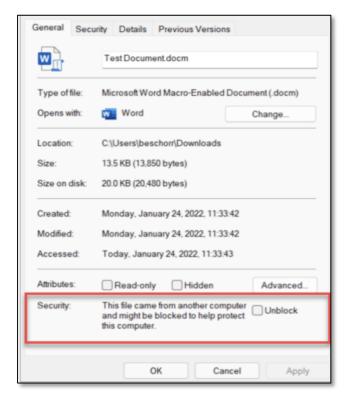
You must have **Macros enabled** for the content to show up correctly.

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

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

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

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



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

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

For a short tutorial on how to enable macros please see this FAQ in Helpdesk.



2.4.2. Uploading the offline Tool and attachments to the AH platform for completion

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

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

Note: Question VD-VERI-25 asks: Are there any photos you would like to add to the verification that did not directly correspond to a question? This is where the Verifier can upload files/ photos/ documents that do not directly relate to any specific question. If the Verifier chooses to upload multiple photos/ documents, it is recommended to create one document (Word or PDF) that contains all files and to label the files/photos appropriately to give the user a clear description of the item.

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2.4.3. Data privacy

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

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

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

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2.4.4. Reviewing Documents

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



2.5. Trouble Shooting/ Errors Guide for Offline Excel Tool

2.5.1. Assessor/Verifier Selection

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

2.5.2. Macros

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

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

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

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

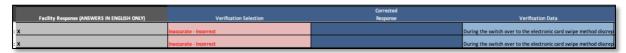
Convergence Program

2.5.3. Offline Tool limitation

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

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

The image below shows one such example.



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



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

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

Return to the top.

2.5.4. Formulas

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



3. How to Complete the Tool

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

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

In addition to this, the Verifier has to complete the Verification/Assessment Details section for more information about the verification. The Verification/Assessment Details provide the Verifier with the opportunity to give specific details related to the facility's level of integrity and cooperativeness during the verification process.

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

There are six (6) Assessor/Verifier Selection options for the Verifier to manually select and three (3) automated verification options that are automatically made for the Verifier by the Tool.

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

The fales of what / 6565551/ Verifier Gelection to choose are as follows.				
Accurate	Information provided by the facility is 100% correct and supported by data			
Updated during Verification	This can only be found in the Facility Profile. When the Verifier arrives on-site the Facility Profile circumstances may be different from what they were during the self/joint-assessment. For all other questions, the assessment period only includes the 12 months prior to the submission date of the self/joint-assessment. However, for Facility Profile information, the Verifier must include the most up-to-date information which may require an update. This applies to question responses that can change frequently, such as number of workers. These changes are not considered "Inaccuracies" but rather updates to the provided facility data (provided that the information shared by the facility was initially correct).			
Inaccurate – Incorrect	Information provided by the facility has one or more errors because the facility intended to mislead by not sharing accurate data (for example, the business license is no longer valid, or the facility leaves out the number of young workers from the overall worker count). This Assessor/Verifier Selection is chosen if: - At least one data point shows that the answer is incomplete or incorrect (i.e., the facility answer is not 100% accurate); or information cannot be			
	verified (i.e., the Verifier cannot prove that the facility answer is accurate) - If there is a lack of documentation that does not permit accurate verification of specific questions			
Inaccurate –	To be selected by the Verifier when the facility has misunderstood the question (e.g., wrong understanding of "worker" and including supervisors in the calculations of total number of workers) and provided an Inaccurate Facility Self/Joint-Assessment Response. This type of facility response is not intended to mislead but is an honest mistake.			
Misunderstanding:	Remember! More Info that provides clarification with definitions and examples to the data points in the Tool should help avoid any potential misunderstandings!			
	However, misunderstandings can still happen. It is important that SLCP is aware of these for continuous improvement.			
Facility did not	This means that the facility did not provide a response.			
reply during SA/JA	This feature is automated. The Verifier does not need to select "Facility did not reply during SA/JA" as it is automatically done for the Verifier in the offline and online version of the Tool. When going from the online AH platform to the offline Tool (available for onsite verification only), the AH completes the			

	"Facility did not reply during SA/JA" Assessor/Verifier Selection before the Verifier opens the offline Tool.
Not visible to facility during SA/JA	The Assessor/Verifier Response opens up conditional questions not previously visible for the facility to answer during self/joint-assessment, and therefore the Facility Self/Joint-Assessment Response is blank. This feature is automated. The Verifier does not need to select "Not visible to facility during SA/JA" as it is automatically done for the Verifier in the online and offline (available for onsite verification only) version of the Tool.
Not applicable due to special facility circumstances:	This is rarely likely to be used. It offers Verifiers the option of noting if something is 'not applicable' if the question has no "Not Applicable" option. Facility circumstances that SLCP has not considered can come up and it is the responsibility of the Verifier to decide if these special circumstances mean that all answer options SLCP provides are not suitable. If this Assessor/Verifier Selection is chosen by the Verifier, then the Assessor/Verifier Response column remains blank and must not be completed because the question is not applicable.
No longer applicable due to verification	The Assessor/Verifier Response makes the conditional questions that were answered (or not answered) by the facility in the self/joint-assessment no longer applicable. This feature is automated. The Verifier no longer needs to select "No longer applicable due to verification" as it is automatically done for the Verifier in the offline and online version of the Tool. The Verifier does not need to provide an explanation in Assessor/Verifier Explanation. Once this option has been automatically selected the Assessor/Verifier Response column remains blank because the question is not applicable. For the user of the verified data the Assessor/Verifier Selection alone makes clear that this data can now be ignored due to verification. Note: No longer applicable due to verification" will be applied for conditional questions depending on the Assessor/Verifier Response AND also if the Assessor/Verifier Selection of the parent question is "Not applicable due to special facility circumstances.
Verification not required	Applicable to a few questions where verification is not necessary. It is the only drop-down selection option in the Assessor/Verifier Selection. No Assessor/Verifier Response can be completed/is needed. If the Verifier chooses to add comments under Assessor/Verifier Explanation they can do so, but it is not required.

Note: Automated Assessor/Verifier Selections may be overridden by the Verifier, i.e., the Verifier can manually change an automated Assessor/Verifier Selection IF the Verifier thinks the system has made a mistake; however, the Verifier MUST raise a ticket to SLCP Support to advise of this change so SLCP can validate the change.



3.1.1. Requirements for Completion of Verification Fields

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

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

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

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

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

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

See Table 1 for Requirements for Completion of Verification Fields.



Table 1: Requirements for Completion of Verification Fields

Assessor/Verifier Selection	Assessor/Verifier Response	Assessor/Verifier Explanation	Non-Compliance	Legal Reference	Photo/ File upload to AH
NEVER BLANK		NEVER BLANK			
For every question that appears in Tool (even if no response provided)		For 195 specific keys that appear in the Tool (even if no response provided), See Appendix III and Section 3.2 for more information.			
		NEVER BLANK if Non-Compliance selected Must fill in narrative to explain the non-compliance so users of the verified data can make corrective action plans.	IF NON- COMPLIANCE OF APPLICABLE LEGAL REQUIREMENTS Non-Compliance selected with "X"2	NEVER BLANK if Non-Compliance selected Must fill in legal reference information	MUST UPLOAD if Non- Compliance selected and if proof/ documentation available
Updated during Verification selected	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to explain why update is necessary.			If proof/ documentation available to emphasize a point shared in Assessor/Verifier Explanation, then must upload
Inaccurate - Incorrect selected	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Incorrect and share facility details so users of the verified data can make corrective action plans as necessary.	As applicable	If Non-Compliance selected, must fill in narrative	MUST UPLOAD if proof/ documentation available



² Note that there is automation for Non-Compliance selection and Legal Reference narrative completion on the Accredited Host platform for select countries.

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Inaccurate - Misunderstanding selected	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to explain why the Facility Self/Joint-Assessment Response was Inaccurate – Misunderstanding and share facility details so users of the verified data can make corrective action plans as necessary. Information helps SLCP to continuously improve.	As applicable	If Non-Compliance selected, must fill in narrative	MUST UPLOAD if proof/ documentation available
Facility did not reply during SA/JA automatic selection	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to explain why the facility did not respond, what Verifier reviewed to support answer and share facility details, as necessary, so users of the verified data can make corrective action plans, as necessary.	As applicable	If Non-Compliance selected, must fill in narrative	If Non-Compliance selected OR if there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload
Not visible to facility during SA/JA automatic selection	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to briefly explain why this question is now applicable. If there is a Non-Compliance must fill in narrative. If there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding, the Verifier must share facility details so users of the verified data can make corrective action plans, as necessary.	As applicable	If Non-Compliance selected, must fill in narrative	If Non-Compliance selected OR if there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload
Accurate selected		As applicable Must fill in narrative if Verifier wants to provide additional information about facility circumstances	As applicable	If Non-Compliance selected, must fill in narrative	If Non-Compliance selected OR if there is an issue that as per Verifier social audit experience would result



	If there is a Non-Compliance If there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding, the Verifier must share facility details so users of the verified data can make corrective action plans as necessary		in a Code of Conduct finding AND if proof/ documentation available THEN must upload
Not applicable due to special facility circumstances selected	NEVER BLANK Must fill in narrative to explain why there is a special facility circumstance that results in the Assessor/Verifier Response not being applicable		If proof/ documentation available to emphasize a point shared in Assessor/Verifier Explanation, then must upload
No longer applicable due to verification automatic selection	Verifier can choose to leave comments		
Verification not Required	Verifier can choose to leave comments		



3.1.2. Examples of Assessor/Verifier Selections and Entries

	EXAMPLES: Assessor/Verifier Selections and Entries				
Inaccurate – Incorrect	A facility's business license is no longer valid, but the facility enters in the information as if still valid.	 The user of the data needs to understand what the accurate situation is (Assessor/Verifier Response) and why the situation was not captured accurately by the facility in the self/joint-assessment (Assessor/Verifier Explanation). Specifically, the Assessor/Verifier Explanation must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Assessor/Verifier Explanation must address: number of persons affected name of the policy or procedure in question dates of the relevant records 			
Inaccurate – Misunderstanding	A facility did not understand meaning of casual worker (note, the Tool provides the user with all SLCP definition of terms and data point clarifications in "More Info", which should minimize misunderstandings).	 place of incidence or activity any other information that the user of the data should know to assist them with future follow-up or corrective actions, which are outside of the SLCP assessment process 			
Not visible to facility during SA/JA	& Hiring, Wages & Benefi If the Verifier finds that the changes the Assessor/Ver facility become visible for In this case, the option "N Assessor/Verifier Explana	nhide questions in other Sections (Recruitment ts, etc.). e facility was inaccurate by NOT selecting "X", "Yes" or entering a number >0 in worker demographics and rifier Response to "X", "Yes" or a number above 0 then the conditional questions that were hidden for the the Verifier (further down in various sections of the Tool). lot visible to facility during SA/JA" will be automatically selected in the Tool and the Verifier must then enter ation to support the Assessor/Verifier Response. cility answered accurately, the conditional questions remain hidden (if the facility did not select "X" or "Yes" or			



Updated during verification	An additional production building was found during verification that was not mentioned in the facility's self-assessment. In this case, the Verifier must select "Updated during Verification" in the Facility Profile and enter the correct number of production buildings. Under "Assessor/Verifier Explanation", the Verifier should note why this information was not included in the self-assessment. If the Verifier suspects that the facility was deliberately providing inaccurate information, this should be noted under "Assessor/Verifier Explanation" and also repeated in Verification/Assessment Details.
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3.2. The Assessor/Verifier Explanation Field and the Standardized Narrative Template

3.2.1. What is the Assessor/Verifier Explanation field and why is it relevant?

Similar to taking a photograph, the Assessor/Verifier Explanation field serves as a thorough record of the situation within the facility.

To gain a comprehensive understanding of the actual working conditions within the facility, end-users require access to detailed and comprehensive information regarding the circumstances in that facility. Verifiers are, therefore, requested to include a detailed and comprehensive narrative in the Assessor/Verifier **Explanation field** to clearly explain the current circumstances of the facility.

The Assessor/Verifier Explanation field serves as a thorough record with detailed evidence of the situation assessed during verification. It offers a comprehensive understanding, even for individuals not physically present during the assessment. It functions similarly to taking a photograph, capturing essential details to help readers understand the reasons behind the Assessor/Verifier Selection the Verifier entered.

Due to the high importance of the Assessor/Verifier Explanation field for end-users, with the release of CAF v1.6, the Assessor/Verifier Explanation field will be subject to automated quality checks (for more details on this see Sections 3.2.6 and 3.2.7).

Through automated quality checks, SLCP will be able to assess whether the minimum requirements to fill in the Assessor/Verifier Explanation information (as displayed in Table 2) were followed.

In the event of insufficiently detailed information and/or missing information, the Verifier will be notified of their mistakes through the automated system and must make corrections to proceed. The recurrence of this type of failure to follow the Protocol and Guidance will also lead to a Corrective Action Request (CAR) that will have an impact on the VB score.

Consequently, it is very important that all the Verifier's selections are backed up with thorough evidence: information gathered during verification shall always be recorded accurately and in a detailed and comprehensive manner and included in the Assessor/Verifier Explanation field.

3.2.2. How to accurately complete the Assessor/Verifier Explanation field

Be specific, detailed and consistent when writing the narrative.

To ensure the comprehensiveness of the narrative included in the Assessor/Verifier Explanation field, you must:

- a) Be specific and detailed in your narrative:
 - Explain Assessor/Verifier Selection: Verifiers must start with a concise explanation of the reasoning behind the specific "Assessor/Verifier Selection" (e.g., Why did you select "Accurate" "Inaccurate-Misunderstanding"?). This provides clarity and context for the rest of the narrative, helping to ensure consistency and understanding throughout the assessment report.
 - Clearly state the source: Verifiers must include specific references on how the information reported in the Assessor/Verifier Explanation was gathered and how it was cross-checked during the verification. The Verifier should have a good understanding of how to connect different sources of information to inform a specific situation. This is included in general social auditing training/examinations/certifications. Therefore, Verifiers must clearly state the source of their specific information. This level of detail ensures transparency and allows for better understanding for end-users on the information presented in the report.



- Level of impact and the frequency of occurrence: Additionally, whenever applicable, Verifiers must include specific references to the level of impact and the frequency of occurrence of the information gathered. For example, the narrative should address guestions such as: How many workers were impacted? How often did the issue occur? By including this level of detail, the Verifiers enable end-users to understand the severity and frequency of the issues identified during the verification.
- b) Be consistent on interconnected topics in your narrative throughout the assessment report:

As explained in the SLCP training "Holistic triangulation to ensure high-quality data" (mandatory for all SLCP Verifiers and available on the STEP platform), Verifiers are requested to approach the Data Collection Tool holistically.

Holistic means dealing with or treating the system as a whole and interconnecting different parts to form the bigger picture. In practice, applying a holistic approach to the narrative writing process means being able to:

- Think about all the topics that relate (= are interconnected) to the information gathered (e.g., if you identified inaccurate and/or incomplete working hours records, the interconnected topic would be the accuracy of payroll records).
- **Identify all the interconnected data points** in the Data Collection Tool related to the information gathered. (For example: WH-WOR-3- Does the facility maintain only one accurate set of working hour records? YES-Inaccurate-Incorrect is interconnected with WB-WAGE-2 Does the facility maintain only one accurate payroll record? And, with WH-WOR-4-2 Working hour records are consistent with payroll and other records and with WB-WAGE-3-2 Payroll records are consistent with attendance records and other records).
- Record the information consistently in the narrative displayed under all the interconnected data points in the Data Collection Tool.

If the Verifier is unclear on how to use the SLCP Data Collection Tool holistically and how to connect different data to provide a clear picture of a specific situation. SLCP recommends the Verifier refresh their skills by repeating the SLCP training on Holistic triangulation to ensure high-quality data.



3.2.3. What kind of information to include in the Assessor/Verifier Explanation field

Always use SLCP "standardize narrative text" when filling in the Assessor/Verifier selection fields

To support the Verifier in the writing process and to streamline the format of the information included in the Assessor/Verifier Explanation field, a standardized narrative text was developed.

Table 2: Standardized narrative text

The facility response is Accurate because: "xxx"

The facility response is Incorrect because: "xxx"

The facility misunderstood the question because: "xxx"

This requirement is not applicable due to the following special circumstances: "xxx"

The facility did not reply during self/joint-assessment because: "xxx"

The facility did not see this question during the self/joint assessment because: "xxx"

This question is not applicable to the facility because: "xxx"

Source of information: Facility walkthrough: "xxx" Facility walkthrough of location ..., name of the department... Details: "xxx" Summary: It was observed that ... Impact: # out of total # workers are impacted lmpacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, nonproduction... Occurrence: This was observed ... times during walkthrough. Attachment: Picture shows evidence related to...

Source of information: Worker interview: "xxx" # out of total # workers interviewed reported that ... Details: "xxx" Summary: Workers reported that ... Impact: # out of total # workers are impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on in the months of during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays ...

Source of information: Management interview: "xxx" Interview with title of management person(s) xxx Details: "xxx" Summary: Managers reported that.... Impact: # out of total # workers are impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, nonproduction... Occurrence: This happened on..., in the months of ..., during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays...

Source of information: Documentation review: "xxx" The following document was checked: personnel file, working hour records, production record, policy on xxx, procedure on xxx, name of document, document dated, document from xxx month xxx Details: "xxx" Summary: Documentation shows # discrepancy between ... and .../ missing records of... Impact: # out of total # records reviewed shows ..., the number of workers impacted are # out of # records reviewed.... Occurrence: This happened on ..., in the months of ..., during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays... Attachment: Document titled ... shows evidence related to..



The standardized narrative text displayed in Table 2 includes different fonts and colors. To avoid any confusion, below is the guidance on how to interpret the different fonts and colors displayed in the standardized text narrative:

Black and bolded text = mandatory text to copy/paste and keep in the narrative of the final verified assessment report

Three red X's (XXX) = Text field needs to be added by the Verifier to provide required details

Italicized and grey text = reminders and a guide of how to structure the narrative, indicating necessary details to include

The standardized narrative text must be used as a compass providing clear direction to Verifiers on which information to include in the narrative.

All the details displayed under "Source of information" - such as the level of impact and the frequency of occurrence of specific situations - provide the necessary context for report users to assess the working conditions within the facility. At the same time, because Verifiers will provide details on how data was gathered and validated on-site, report users will gain a deeper understanding of the verification processes conducted onsite. This fosters confidence in the professional judgment of Verifiers.

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3.2.4. How to use the standardized narrative text to fill in the Assessor/Verifier Explanation field

Check SLCP "minimum requirements for narrative writing" below when using the standardized narrative text.

Verifiers are not required to use the entire standardized narrative text as displayed in Table 2. Instead, Verifiers are requested to modify the text as necessary to accurately reflect the specific circumstances of the facility.

However, certain parts of the standardized text are mandatory: they shall always be included in the narrative. This required text to keep in the narrative is called: "SLCP minimum requirements for narrative writing".

Table 3 displays all the minimum requirements that must always be included in the Assessor/Verifier Explanation field.



Table 3: How to use the standardized narrative text - SLCP minimum requirements for narrative writing

Standardized narrative text	SLCP minimum requirements for narrative writing
1. The facility response is Accurate because: "xxx"	1 of the 7 combinations must always be
2. The facility response is Incorrect because: "xxx"	included in the narrative
3. The facility misunderstood the question because: "xxx"	Black and bolded text must always be
4. This requirement is not applicable due to the following special circumstances: "xxx"	included in the narrative
5. The facility did not reply during self/joint-assessment because: "xxx"	
6. The facility did not see this question during the self/joint assessment because: "xxx"	 Text must always follow the ":" sign and where the triple red X's "xxx" are displayed.
7. This question is not applicable to the facility because: "xxx"	
Source of information: Facility walkthrough: "xxx" Facility walkthrough of location, name of the department Details: "xxx" Summary: it was observed that Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This was observed times during walkthrough. Attachment: Picture shows evidence related to Source of information: Worker interview: "xxx" # out of total # workers interviewed reported that Details: "xxx"	At least 1 of the 4 sources of information must always be included in the narrative Black and bolded text must always be included in the narrative
Summary: Workers reported that Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on, in the months of, during the year; at hiring, at termination; during peak low season; weekdays, rest days, public holidays	Text must always follow the ":" sign and where the triple red X's "xxx" are displayed.
Source of information: Management interview: "xxx" Interview with title of management person(s) xxx Details: "xxx" Summary: Managers reported that Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on, in the months of, during the year; at hiring, at termination; during peak low season; weekdays, rest days, public holidays	
Source of information: Documentation review: "xxx" The following document was checked: personnel file, working hour records, production record, policy on xxx, procedure on xxx, name of document, document dated, document from xxx month xxx Details: "xxx" Summary: Documentation shows # discrepancy between and/ missing records of Impact: # out of total # records reviewed shows, the number of workers impacted are # out of # records reviewed Occurrence: This happened on, in the months of, during the year; at hiring, at termination; during peak low season; weekdays, rest days, public holidays Attachment: Document titled shows evidence related to	



To apply SLCP minimum requirements to narrative writing. Verifiers must follow these 3 steps:

1. Copy/paste the "standardized narrative text" into the Assessor/Verifier Explanation field (see Table 2)

The facility response is Accurate because: "xxx" The facility response is Incorrect because: "xxx" The facility misunderstood the question because: "xxx" This requirement is not applicable due to the following special circumstances: "xxx" The facility did not reply during self/joint-assessment because: "xxx" The facility did not see this question during the self/joint assessment because: "xxx" This question is not applicable to the facility because: "xxx"

Source of information: Facility walkthrough: "xxx" Facility walkthrough of location ..., name of the department... Details: "xxx" Summary: it was observed that ... Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production... Occurrence: This was observed ... times during walkthrough. Attachment: Picture shows evidence related to ...

Source of information: Worker interview: "xxxx" # out of total # workers are impacted workers are: migrant, ... Details: "xxx" Summary: Workers reported that ... Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on in the months of during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays

Source of information: Management interview: "xxxx" Interview with title of management person(s) xxxx Details: "xxxx" Summary: Managers reported that.... Impact: # out of total # workers are impacted. Impacted workers are: migrant. voung, part-time, full-time, contracted, migrant, female, non-production... Occurrence: This happened on in the months of during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays...

Source of information: Documentation review: "xxx" The following document was checked: personnel file, working hour records, production record, policy on xxx, procedure on xxx, name of document, document dated, document from xxx month xxx. Details: "xxx" Summary: Documentation shows # discrepancy between ... and .../ missing records of... Impact: # out of total # records reviewed shows ... , the number of workers impacted are # out of # records reviewed.... Occurrence: This happened on ..., in the months of ..., during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays... Attachment: Document titled... shows evidence related to...

2. Edit the text as needed, making deletions as necessary:

2.1 Keep only 1 of the 7 facilities' response assessment and delete the ones that are not applicable:

The facility response is Accurate because: "xxx" The facility response is Incorrect because: "xxx" The facility misunderstood the question because: "xxx" This requirement is not applicable due do the following special circumstances: "xxx" The facility did not reply during self/joint-assessment because: "xxx" The facility did not see this question during the self/joint assessment because: "xxx" This question is not applicable to the facility because: "xxx"

2.2 Keep 1 or more of the source of information and delete the ones that are not applicable:

Source of information: Facility walkthrough: "xxx" Facility walkthrough of location ..., name of the department... Details: "xxx" Summary: it was observed that ... Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production... Occurrence: This was observed ... times during walkthrough. Attachment: Picture shows evidence related to ...

Source of information: Worker interview: "xxxx" # out of total # workers are impacted workers are: migrant, ... Details: "xxx" Summary: Workers reported that ... Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on in the months of during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays

Source of information: Management interview: "xxx" Interview with title of management person(s) xxx Details: "xxx" Summary: Managers reported that.... Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production... Occurrence: This happened on..., in the months of ..., during the year ...; at hirring, at termination; during peak low season; weekdays, rest days, public holidays...

Source of information: Documentation review: "xxx" The following document was checked: personnel file, working hour records, production record, policy on xxx, procedure on xxx, name of document, document dated, document from xxx month xxx. Details: "xxx" Summary: Documentation shows # discrepancy between ... and .../ missing records of... Impact: # out of total # records reviewed shows ... , the number of workers impacted are # out of # records reviewed.... Occurrence: This happened on in the months of ..., during the year ...; at hiring, at termination; during peak low season; weekdays, rest days, public holidays... Attachment: Document titled... shows evidence related to...



3. Add required detailed text as necessary to complete the narrative and pay attention to include all the "SLCP minimum requirements" (see Table 3)

EXAMPLE:

Scenario: Facility response: No/ Verifier assessed that the facility response is Inaccurate-Incorrect. Legal non-compliance identified.

Question: HS-GEN-28: Are workers allowed access to toilets/restrooms at any time?

The facility misunderstood the question because: they thought "at any time" means that the workers can access toilets during the shift. Since they are given 2 passes, the facility thought they can answer this question as Yes.

Source of information: Facility walkthrough: Ironing department Details: There is 1 permission registry on the wall with workers and supervisors' signatures. Majority of dates refer to "January 2022". Attachment: picture shows evidence of permission registry on the wall.

Source of information: Worker interview: 3 out of total 12 workers interviewed reported that permission needs to be asked to go to the toilet during peak seasons. **Details**: All workers impacted. During peak season, at least 3 times/year (January-March-December).

Source of information: Documentation review: The following document was checked: HR policy dated July 2020 Details: Summary: Footnote p. 22, Chapter 3, stating that workers might be subject to restrictions during peak season. Examples of restrictions include toilet, lunch breaks. Attachment: "HR policy" contains evidence related to the restrictions in place during peak season. Attachment: Document titled HR policy shows evidence related to the restriction in place.

For more examples of narrative aligned with SLCP requirements, please check Section 3.2.8. Please note that the standardized narrative text IS NOT visible on the Accredited Host platform. Verifiers must input the narrative manually for all applicable Assessor/Verifiers Explanation fields.



Do I have to fill in the Assessor/Verifier Explanation field and use the standardized text for all the data points in the Data Collection Tool?

Yes. As explained in the Verification Protocol, Verifiers must fill in specific and detailed narrative for all the data points in the Data Collection Tool with the following Assessor/ Verifier Selections:

Table 4: Assessor/Verifier Selections and mandatory narrative

Assessor/Verifier Selections	Must Verifiers fill in the Assessor/Verifier Explanation?	Must Verifiers use the standardized narrative text to fill in the Assessor/Verifier Explanation?
Inaccurate – Incorrect	Yes - NEVER BLANK	Yes - Use Standardized Narrative Text
Inaccurate - Misunderstanding	Yes - NEVER BLANK	Yes - Use Standardized Narrative Text
Not applicable due to special facility circumstances	Yes - NEVER BLANK	Yes - Use Standardized Narrative Text
Facility did not reply during SA/JA	Yes - NEVER BLANK	Yes - Use Standardized Narrative Text
Not visible to facility during SA/JA	Yes - NEVER BLANK	Yes - Use Standardized Narrative Text
No longer applicable due to assessment/verification	Yes - NEVER BLANK	Yes - Use Standardized Narrative Text



ATTENTION

In addition to the above requirements, Verifiers must fill in the Assessor/Verifier Explanation fields even if Assessor/Verifier Selection is "Accurate" for the 195 highly relevant keys and for "unique cases". See more information below.



What are the "195 highly relevant keys"?

In 2023, SLCP - supported by a group of report users - completed a project that identified the most relevant keys for compliance and remediation within the Data Collection Tool. As a result, a list of 195 "highly relevant keys" (see Appendix III for full list) was developed.

The 195 keys relate to **7 different sections of the Tool**:

Worker Involvement: 18 questions; Wages and Benefits: 31 questions; Health and Safety: 47 questions:

Recruitment and Hiring: 55 questions:

Working Hours: 22 questions; Worker Treatment: 15 questions:

Termination: 7 questions.

For the 195 keys, even if the Assessor/Verifier Selection is Accurate and even if there is NO legal non-compliance, Verifiers must add specific and detailed narrative by following the SLCP minimum requirements for narrative writing.

See Appendix III for the full list of the 195 keys.

What are "unique cases"?

- Cases related to specific national legal requirements not explicitly addressed in the Data Collection Tool but highly relevant for the report users to fully understand the situation in the facility. An example is the Variance Dearness Allowance (VDA) in India.
- Situations of facilities being in line with specific national legal requirements that might still result in a potential Code of Conduct violation, such as legally required medical tests (e.g., hepatitis tests).
- Cases related to hiring of prison labor, forced labor, unethical recruitment, child labor, discrimination, harassment, and abuse.

In summary, for the 195 highly relevant keys and for unique cases, even if Accurate and even without legal non-compliances, Verifiers must fill in the Assessor/Verifier Explanation with the standardized narrative text.



3.2.6. Will SLCP check the narrative filled in for all the data points of the Data Collection Tool?

NO. Currently, SLCP will only check - through automated checks - the Assessor/Verifier Explanation fields of the 195 highly relevant keys. In the future, SLCP is planning to check the narrative included in all the data points of the Data Collection Tool.

Starting from August 2024, all entries in the Assessor/Verifier Explanation field of the 195 highly relevant keys will undergo an automated quality check to identify whether the narrative is in line with SLCP minimum requirements.

What are automated checks?

Automated checks are technology-driven checks run on each verified assessment report to identify failures related to implementation of SLCP verification procedure and verified assessment report content. In a very short amount of time (approx. 5 minutes), automated checks can examine more than 3000 data points. Examples of flags identified include missing completion of required fields and mistakes in Assessor/Verifier Selection. If failures are identified, Verifiers are notified and must make edits to the assessment report.

With the launch of CAF v1.6, SLCP extended the scope of the existing automated checks to the Assessor/Verifier Explanation field. Automated checks on the Assessor/Verifier Explanation field will identify whether:

- a) Verifiers are filling the Assessor/Verifier Explanation field as per requirement
- b) Verifiers are correctly using the standardized narrative text to fill in the Assessor/Verifier Explanation field as per requirement.

More information on our automated checks is on our Helpdesk. The list of checks will be updated on a regular basis.

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3.2.7. What does SLCP check in the narrative field of the 195 highly relevant keys?

Existence of the narrative: SLCP will check whether all the Assessor/Verifier Explanation fields of the 195 highly relevant keys are included in the narrative. If the machine detects **empty fields**, it will generate an ERROR.

REMEMBER that for the 195 highly relevant keys, Verifiers must include narrative even if Assessor/Verifier Selection is Accurate and there is no legal non-compliance.

Comprehensiveness of the narrative: SLCP will check whether the information included is structured as per minimum requirements. To check the comprehensiveness of the narrative, the machine will run two different checks:

- o Word search: the machine will scan the text written by the Verifier to ensure that specific words are always included in the narrative.
- o Count of characters: the machine will count the number of characters used after the ":" sign and where the triple red X's "xxx" are as per Table 2. If the machine detects less than 40 characters, it will generate an ERROR.

Therefore, Verifiers must pay particular attention to possible misspelling of the mandatory text and to the length of the text included: the automated checks will identify errors if the black and bolded text is misspelled and if the text added in the "Details" part has less than 40 characters. See Table 5 below.



Table 5: Requirements to pass "word search" and "count of characters" during automated checks

Standardized narrative text	Requirements to pass the word search	Requirements to pass the count of characters
The facility response is Accurate because: "xxx" The facility response is Incorrect because: "xxx" The facility misunderstood the question because: "xxx" This requirement is not applicable due to the following special circumstances: "xxx" The facility did not reply during self/joint-assessment because: "xxx" The facility did not see this question during the self/joint assessment because: "xxx" This question is not applicable to the facility because: "xxx"	 1 of the 7 combinations about facility response must always be included in the narrative Black and bolded text must always be included in the narrative 	 Text displayed after the ":" sign and where the triple red X's "xxx" has at least 40 characters
Source of information: Facility walkthrough: "xxx" Facility walkthrough of location, name of the department Details: "xxx" Summary: it was observed that Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This was observed times during walkthrough. Attachment: Picture shows evidence related to Source of information: Worker interview: "xxx" # out of total # workers interviewed reported that Details: "xxx" Summary: Workers reported that Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on, in the months of, during the year; at hiring, at termination; during peak low season; weekdays, rest days, public holidays Source of information: Management interview: "xxx" Interview with title of management person(s) xxx Details: "xxx" Summary: Managers reported that Impact: # out of total # workers are impacted. Impacted workers are: migrant, young, part-time, full-time, contracted, migrant, female, non-production Occurrence: This happened on, in the months of, during the year; at hiring, at termination; during peak low season; weekdays, rest days, public holidays Source of information: Documentation review: "xxx" The following document was checked: personnel file, working hour records, production record, policy on xxx, procedure on xxx, name of document, document dated, document from xxx month xxx. Details: "xxx" Summary: Documentation shows # discrepancy between and/ missing records of Impact: # out of total # records reviewed shows, the number of workers impacted are # out of # records reviewed Occurrence: This happened on, in the months of, during the year; at hiring, at termination; during peak low season; weekdays,	At least 1 of the 4 sources of information must always be included in the narrative Black and bolded text must always be included in the narrative	Text displayed after the ":" sign and where the triple red X's "xxx" has at least 40 characters

During the VB quality review process, quality reviewers should check if all the requirements to pass the automated checks have been applied to the 195 highly relevant keys. In case of missing requirements, quality reviewers should promptly alert the Verifiers. The report completed by the Verifier before it goes to VRC (Verification Completed) and undergoes the automated check (VRQ - Verification Quality Check) must include all required text and amount of text to avoid errors during automated checks.

What happens if an ERROR is identified?

Where we identify reoccurring mistakes in report writing, the VOO will issue Corrective Action Requests to the VB and consequently the VB score will be negatively impacted.

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3.2.8. Examples of Assessor/Verifier Explanation in line with SLCP requirements

Question: HS-EME-9: Does the facility regularly test and service fire extinguishers and other firefighting equipment in line with legal requirements?

Scenario: Facility response: YES / Verifier assessed that the facility response is Accurate.

This question is one of the 195 highly relevant keys.

The facility response is Accurate because: fire extinguishers and sprinklers, were regularly tested, and maintained as legally required.

Source of information: Facility walkthrough: Throughout the facility tour. Details: Fire extinguishers were inspected on April 4th and have consistently been inspected during the initial five days of each month. It was noted that the fire extinguishers were appropriately positioned as per legal requirements. Sprinklers were tested by an external provider. Attachment: Picture showing evidence related to fire extinguishers inspection tag. Sprinklers pictures displayed.

Source of information: Documentation Review: The following document was checked: Fire extinguisher maintenance inspection records. Details: Fire extinguisher maintenance inspection reports from the past year consistently show adherence to NFPA 10 standard standards. The sprinkler inspection records demonstrate compliance adherence.

Question: HS-EME-15: Are all emergency exits accessible, unobstructed, and unlocked during working hours (including overtime) and lead to a place of safety? Scenario: Facility response: YES / Verifier assessed that the facility response is Inaccurate-Incorrect.

This question is one of the 195 highly relevant keys.

The facility response is Incorrect because: exit doors were either inaccessible, obstructed, or locked.

Source of information: Facility walkthrough: Throughout the facility tour. Details: It was observed that 6 out 10 exit doors in the production floor were either inaccessible. obstructed or locked. Attachment: picture of some of these obstructed emergency exits doors in the production floor.



Question: HS-CAN-4: Do food service workers have valid health/sanitation certificates/permits, as legally required?

Scenario: Facility response: No/ Verifier assessed that the facility response is Inaccurate-Incorrect.

This question is one of the 195 highly relevant keys.

The facility response is Incorrect because: The answer is rather Not Applicable. The canteen service is no longer provided to workers.

Source of information: Management interview: Interview with 3 managers. Details: managers shared that starting from June 2023 workers are bringing their own food. Facility only has an eating area but no onsite/offsite canteen.

Question: WH-WOR-3: Does the facility maintain only one accurate set of working hour records?

Scenario: Facility response: Yes / Verifier assessed that the facility response is Inaccurate-Incorrect

This question is one of the 195 highly relevant keys.

The facility response is Incorrect because: Inconsistency between training records and facility's attendance records.

Source of information: Documentation review: The following document was checked: attendance records of a training on how to use the laminating machine delivered on Sunday March 10, 2024 to the workers using the machine (in tot. 20) and the facility's attendance records (automatic attendance records). Documentation shows discrepancy between the training attendance records and facility's attendance records. Impact: 3 out of the 12 records reviewed shows that the 3 workers were on site receiving the training on Sunday March 10. Occurrence: This happened only once, in the month of March. The factory provided attendance records showed that the 3 workers rested on that day. Attachment: Picture shows training records with the employee signature.

Source of information: Worker interview: 6 out of total 12 workers interviewed reported working on Sunday due to laminating trainings. Details: 6 out of total 12 workers interviewed reported that when they attended the laminating machine training on a Sunday but were requested not to swipe the attendance badge.



Question: WT-FOR-2: Have any cases of violence or threats of violence to intimidate workers and force them to work occurred at the workplace?

Scenario: Facility response: No / Verifier assessed that the facility response is Inaccurate-Incorrect

The facility response is Incorrect because: cases of management yelling to newly hired workers were reported.

Source of information: Worker interview: 60% of the workers interviewed reported that they have often seen the management yelling to newly hired workers, during probation. Interviewed workers reported that the new workers have shared that they do not know how to respond to that constant yelling.

Source of information: Management interview: Interview with 3 managers. Details: managers described that during probation workers are often raising their voice to encourage the new workers to do their job correctly. They reported that none of the workers have complained. They mentioned, however, that some workers were not fit for the job and left a few weeks after being hired.

Source of information: Document review: Payroll records from November 2023 shows that 3 new hires (hired in October) were paid only half of the month. Grievance mechanism records: In October 2022, one complaint was recorded referring to management yelling to workers. Resolution date was December 2023. Info recorded "management" talked with the xx worker and through open communication solved the issue."

3.3. How do I identify and explain when a facility is not in line with legal requirements?

SLCP assesses compliance against legal and regulatory frameworks and does not assess compliance against Codes of Conduct and voluntary standards. An SLCP non-compliance refers to both national regulation and International Labour Standards. When a country has ratified an ILO convention, the foundation is set for that country to apply the basic principles of the convention to national law and practice. In this sense, national law can be more specific than ILO conventions as it is customized to a country or regional context.

In SLCP's Tool, if there is no applicable national regulation, then the Fundamental Principles and Rights at Work from the Internation Labour Organization are applied, even if a country has not ratified these core conventions. Otherwise, the national law prevails or ILO conventions that have been ratified by the applicable country, whichever is stricter.

Whenever the term "non-compliance" is used within the CAF (Verifier and facility guidance and protocols) it pertains to both national law and International Labour Standards that have been ratified by the applicable country or the Fundamental Principles and Rights at Work even if they have not been ratified.

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

Important! When a Non-Compliance is identified, the Verifier must check the "Non-Compliance" column and fill out the applicable legal requirement in the "Legal Reference" column.

3.3.1. Tool meaning of "Consult applicable legal requirements"

The Tool is aligned with international labor standards and national laws. Any time a question references the law (e.g., "in line with legal requirements", "legally required"), the facility (and Verifier) must consult applicable legal requirements to assess the answer (verified answer) to the question. "More Info" provides instructions on what to do if there are no applicable legal requirements.

Applicable legal requirements include:

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



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

Law Overlay will be provided by Better Work for select countries and only for Step 1 scope. Information on country-specific laws will be attached to each applicable question in Step 1 on the Accredited Host platform in the form of "Law Guidance". Similar to More Info, the facility and Verifier will have access to country-specific "Law Guidance" on the Accredited Host platform.

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

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

The Law Overlay = Law Guidance and the automated application of the law information depending on the Verifier's actions. If the Final Response determined by the Verifier results in a Non-Compliance, and Better Work has provided Law Guidance to SLCP for that specific country in which the verification is taking place, then the automatic Law Overlay will be implemented on the Accredited Host platform.

- Final Response means the facility Self/Joint-Assessment response if the Assessor/Verifier Selection is "Accurate", or it is the Assessor/Verifier Response.
- Once the Final Response has been determined. The Accredited Host will automatically complete the Non-Compliance "X" and the Legal Reference narrative as per Better Work provided information. For Step 1 questions with Law Guidance, the Verifier does not need to determine whether a specific facility circumstance is not in compliance with applicable legal requirements. The system will automatically do it for them. This automatic feature increases report quality through standard application of non-compliances and legal references.

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

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

- derived from international instruments
- materials developed within the ILO and in consultation with tripartite constituents.

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

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

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

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



3.3.3. Examples of Legal Reference Questions

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

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

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

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

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



3.4. How do I review and verify wages and hours records?

3.4.1. Reviewing Records

When reviewing wages and hours, Verifiers must select three pay periods (recent, high, low production period) from the 12-month assessment period to verify the self/joint-assessment data. If closure of production happened, the pay period during/ after closure must also be included.

NOTE: In CAF 1.6, the Verifier will be required to check the facility's calculation of the "average monthly" wage data information for both the lowest and most represented wage grade / level in the facility (WB-WAGE-62 to WB-WAGE-75). For the new questions on the "average monthly" wages, the facility will have to calculate wages over the 12 months of the assessment period (regardless if payroll occurs weekly, daily or hourly) and then divide the total by 12 to calculate the monthly average. The Verifier's role will be to check the validity of the calculation of the manufacturer and be able to follow the calculation the facility made.

3.4.2. Examples of Reviewing and Verifying Wages and Hours records

EXAMPLES

Reviewing Wage and Hours Records

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

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

Example 2: If the facility reports something that the Verifier did not find in their sample, e.g., the facility reports transparently about overtime hours, but the Verifier does not identify overtime hours worked in the chosen sample, then the Verifier must extend the sample to validate the facility's information.

The Verifier not finding overtime, does not necessarily mean that the facility did not have any overtime and the Facility Self/Joint-Assessment Response is Inaccurate - Incorrect. The Verifier must ask the facility to present the records showing overtime so the Verifier can accurately reflect the facility circumstances.

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

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

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

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

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

EXAMPLES

Number of languages spoken by workers

Example 1

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



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

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

Example 2:

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

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

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

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3.6. How do I address facility concerns during verification/ closing meeting?

The Verifier must address any facility concerns brought up during the verification/ closing meeting within two days (48 hours) from end of onsite verification and address any applicable requests for edits by the facility in VRE as soon as possible.

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3.6.1. Example of using the 48-hour period to address facility concerns

EXAMPLE Addressing Facility Concerns

If a facility is unsure if they can share a document due to confidentiality, then the Verifier can use the 48 hours period after the onsite assessment to allow the facility to share more information with the Verifier

During the onsite, it should be evaluated that this document really exists and is something that is being implemented.

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3.7. How do I verify worker engagement in the facility?

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

A worker management committee functions as a forum for communications, consultation and deliberation between a facility and representatives of trade unions (if applicable) or workers. A worker management committee is also responsible for identifying, reporting and verifying issues. The overall aim is to increase workers' productivity and welfare, which in turn will ensure the sustainability of the business.

The Verifier must confirm if the facility engaged workers in the SLCP process (FP-BAS-27) and then also follow up to understand the extent of engagement by workers (FP-BAS-27.3). All information should be included in the Verification/ Assessment Details section of the Tool as well as including any additional, relevant information about the process.

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

EXAMPLE: Verifying Worker Engagement in the Facility

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

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

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3.8. What is the Verification Summary?

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

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

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

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

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

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

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

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3.8.1. How do I generate the Verification Summary?

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



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

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

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

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

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





4. Full Virtual Verification

4.1. Facility Eligibility

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

A facility is eligible for SLCP Full Virtual Verification if:

- 1) The facility is **currently** experiencing a restriction in operations due to force majeure,
- 2) The restriction in operations that the facility is experiencing due to force majeure has continued for the past 3 months or longer,
- The restriction in operations that the facility is experiencing due to force majeure is not expected to ease within the next 1 month or longer.

Evidence for 1), 2) and 3) is required. The facility must also complete and sign an SLCP Full Virtual Self-declaration form affirming and providing evidence that the above three points are true. The facility must also confirmation that they meet additional eligibility requirements for Full Virtual Verification, i.e., technology requirements, operational capacity, electronic record keeping.

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

The number of questions for Full Virtual Verification has been reduced to adequately verify facility conditions. However, the facility must complete, at minimum, all of Step 2 in the self/ jointassessment process.

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

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4.2. Verifying Facility Eligibility

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

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

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

Important: If the facility has falsified any information provided in the Full Virtual Verification Self-Declaration Form and the Verifier proceeds with verification the verification will be invalidated.

If the VB/ Verifier suspects that information has been falsified in the Full Virtual Verification Self-Declaration Form, the Verifier must contact the VOO immediately at slcp@sumerra.com and stop any further activity.



4.3. Special Requirements for Verifying Full Virtual Verification

- The Verifier must confirm that all policies and procedures are attached to the applicable data point/ question in the self/joint-assessment prior to starting the Full Virtual Verification.
- The Verifier must also be granted access to and reference the final verified assessment report data from the immediately preceding verification for consistency of findings from virtual verification. If there is no prior SLCP verification, the Verifier must be granted access to all (may be several) applicable audit reports from the past 18 months. If there are no applicable audit reports, the timeframe is extended to include the most recent social audit report.
- The Verifier must request proof of presence of specific policies and procedures onsite during the virtual tour. Specific documents requested will not be made known to the facility prior to the date of Full Virtual Verification and must be available upon request.

See the Verification Protocol for all mandatory Full Virtual Verification requirements.

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4.4. WE Question Set

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

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

The facility and the Verifier Body/ Verifier(s) receive the We Tech Summary Report from the WE Tech Service Provider at the same time. If the WE Tech Service Provider only has the VB admin contact email, it is the responsibility of the VB admin to forward the report to the Verifier(s).

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

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

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

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4.4.1. FVV Verification Plan

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



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

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

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4.6. WE Tech Summary Report Action Planning

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

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

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

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4.6.1. Facility Actions to Tool Questions

If a question from the WE Question Set relates to a specific Tool question, the Verifier shall ask if the facility has done anything related to that question as a follow-up to the WE Tech Summary Report (e.g., put the issue on the agenda for the next workers meeting; ask the worker committee to investigate further, etc.). The Verifier must then document the facility answer in the Assessor/Verifier Explanation field related to that Tool question. The Verifier must attach any applicable documents the facility provides to that specific Tool question on the Accredited Host platform. If the documentation is general in nature and applies to multiple Tool questions, attach the document to question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section.

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4.6.2. Facility Action Planning post WE tech Summary Report

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



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

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4.7. Full Virtual Verifier Training

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

The VOO reserves the right to invalidate the verification if the Verifier conducting a Full Virtual Verification has not completed the Full Virtual Verification Training for Verifiers.

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5. Verifier Body/ Verifier Quality Review

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

5.1. Post VRF Edits

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

5.2. Verifier Feedback

The VOO provides VBs with feedback in any instances where a QA activity shows a Verifier has "less than average" performance. While there is no report detailing the specifics, the feedback should be enough for the VB to address any gaps and improve the Verifier's performance. VBs that fail to respond to VOO feedback and inquiries may be subject to their approval status being deactivated.

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

EXAMPLE: Low Verifier Quality Score

Recent reports received a low-quality score because the Verifier(s) did not properly address questions that the facility did not answer. If a facility does not respond to a question, it is the Verifier's responsibility to answer the question by choosing a "Assessor/Verifier Response".

The Assessor/Verifier Explanation entered must support the Assessor/Verifier Response by describing the types of evidence they reviewed.



5.3. What should I remember when reviewing the completed verification report?

- Verification entries must be in English
- All entries must use correct spelling and grammar
- 195 highly relevant keys must have narrative following SLCP requirements
- Any time the Assessor/Verifier Explanation field is completed, the Verifier must provide a thorough response following SLCP requirements
- Verification entries, including photos, do not contain worker names or any personally identifiable information for reasons of confidentiality and privacy. If facility does not permit photographs due to confidentiality, then please note in report under the Verification/Assessment Details section that the facility did not permit a photo of the work in progress/ production line (or other) due to confidentiality/ visibility of brand logos, etc.
- Photos are attached, at minimum, where the Assessor/Verifier Selection is "Inaccurate -"Incorrect" or "Inaccurate - Misunderstanding" or where there is a legal non-compliance and the Verifier has visual proof
- Photos/ attachments accompany the correct question/ topic, i.e., it is clear what question or what topic they refer to
- Where the Verifier identifies that the facility is not in line with applicable local laws, Assessor/Verifier Explanation, Non-Compliance "X" and Legal Reference are included
- If any part of the Facility Response is inaccurate, i.e., the Facility Response is not 100% accurate, "Inaccurate - Incorrect" must be selected
- Check if one inaccuracy also affects other questions and apply the Assessor/Verifier Selection accordingly. Remember holistic triangulation.

5.4. What mistakes should I avoid?

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

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



A Verifier does not enter legal issues correctly.	This includes: - Raising a Non-Compliance when an "Inaccurate - Incorrect" or "Inaccurate - Misunderstanding" Assessor/Verifier Selection relates to a legal requirement - Raising a Non-Compliance when an "Accurate" Assessor/Verifier Selection relates to a legal requirement
A Verifier does not read the "More Info".	The More Info is there for the facility and the Verifier. If there is any doubt in the Verifier's mind that the facility did not respond accurately, the Verifier must consult the " More Info ". Consulting "More Info" avoids misunderstanding or misinterpretation of the questions and ensures correct verification
A Verifier does not take the time to assess the accuracy and completeness of the information provided by the facility.	Verifiers have marked questions as "Inaccurate" because of perceived non-compliances, rather than properly assessing the information, which has resulted in incorrect verification.
A Verifier does not include details in the Assessor/Verifier Explanation field so the user of the report can better determine remediation efforts	If the Final Response shows a result that according to Verifier's social auditing experience would normally result in a code of conduct or standard non-compliance (no matter if the Assessor/Verifier Selection is Accurate or Inaccurate), Assessor/Verifier Explanation must include details so that the user of the report can better inform remediation efforts.

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5.5. Commonly Asked Questions

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



6. Appendix I: Sample Meeting Agendas

6.1. Opening Meeting Agenda Recommendations

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

6.2. Closing Meeting Agenda Recommendations

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



7. Appendix II: Sample Verification Plan

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

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

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

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

7.1. Verification Plan Sample for Virtual + Onsite Verification

Rabat Apparel: SLCP Verification Plan

Job No.: 000001 Verified Facility: Rabat Apparel

Facility address: 123 Morocco Enclave. PRJ000001 Assessment ID:

Rabat, Morocco 10000

No of employees: [Name] 498 Verifier(s):

3 Person-days virtual: 1.5 Step completed Person-days onsite: Verification Start Date: 2021-03-01 2

Verification End Date: 2021-03-02 Total Person-days: 3.5

2021-03-01: Day 1 Virtual

Duration Team A: [Name] Team	m B: [Name]
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	·			
09:00 – 10:00	Virtual pre-verification meeting with [Name] (HR Manager)			
	 Testing video conferencing software including in production areas 			
	 Explanation to facility management on virtual verification methodology 			
	 Question and answer period 			
	Opening Meeting with			
	1) [Name] (HR Manager)			
10:00 – 10:15	2) [Name] (Facility Manager)			
	3) [Name] (OSH Manager)			
	4) [Name] (Trade Union Representative/ Worker Engagement Committee/ Worker Representative)			
	Verification Team Internal Meeting + docume provided:	ents review of soft copies		
	 Policies and procedures as attached by facility in Mgt System section 			
	 Occupational health and safety certificates & operation records 			
10:15 – 11:00	 Production and quality records 			
10.10 11.00	Employee handbook & Facility rules			
	 Production and quality records 			
	Emergency Response Plan			
	 Evacuation procedures 			
	 Complaints/ dispute resolutions procedures 			
	Virtual Management interview with [Name] (Facility Manager)	Virtual walkthrough (refer to facility map) with		
	 Follow up questions re: documentation 	[Name] (OSH Manager)		
11:00 - 12:30	reviewed	Areas listed in map as: Wantabara Wantabara		
	Virtual document review with [Name] (HR Workshop, Wareho			
	Manager) - Training records			
12:30 – 13:30	<u> </u>			
12.30 - 13.30	Lunch Break + Verification Team Internal Meeting			
13:30 - 17:00 Virtual document review with [Name] (HR Manager)		er)		
	"Real time" review of wage and hours records			

	(8 x set of 3 = 24)
17:00 – 17:30	Wrap up meeting with Management Representative

2021-03-02: Day 2 Onsite

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

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

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

7.2. Verification Plan Sample for Full Virtual Verification

Rabat Apparel: SLCP Verification Plan

Verified Facility: Rabat Apparel Job No.: 000001

Facility address: 123 Morocco Enclave, PRJ000001 Assessment ID:

Rabat, Morocco 10000

No of employees: 498 Verifier(s): [Name(s)]

Step completed 3 Person-days virtual: 1.5 Verification Start Date: 2021-03-01 Person-days onsite: 2 Verification End Date: 2021-03-02 Total Person-days: 3.5

2021-03-01: Day 1 Virtual

Duration	Team A: [Name]	Team B: [Name]	
09:00 – 10:30	9:00 – 10:30 Virtual pre-verification meeting with [Name] (HR Manager)		
	cluding in production areas		
	virtual verification methodology		
	 Discussing privacy and confidentiality 	issues	
	for attachments		
	is onsite and available		
	and workforce capacity		
	 Question and answer period 		
	Opening Meeting with		
	1) [Name] (HR Manager)		
10:30 – 11:00	2) [Name] (Facility Manager)		
	3) [Name] (OSH Manager)		
	 (Name) (Trade Union Representative) Worker Representative) 	Worker Engagement Committee/	

	Verification Team Internal Meeting + documents review of soft copies provided:			
	 Policies and procedures present onsite 			
	 Occupational health and safety certificates & operation records 			
	 Production and quality records 			
11:00 – 12:30	Employee handbook & Facility rules			
11.00 - 12.30	 Production and quality records 			
	Emergency Response Plan			
	 Evacuation procedures 			
	 Complaints/ dispute resolutions procedures 			
	WE Tech summary report			
	 Verified assessment report data from immediately preceding verification 			
12:30 – 13:30	Lunch Break + Verification Team Internal Meeting			
13:30 - 14:30	Documents review of soft copies (continued)			
	Virtual Management interview with [Name] (Facility Manager)			
14:30 - 17:00	 Follow up questions re: documentation reviewed 			
	Virtual document review with [Name] (HR Manager)			
	Training records			
17:00 – 17:30	Wrap up meeting with Management Representative			

2021-03-02: Day 2 Virtual

Duration	Team A: [Name]	Team B: [Name]
09:00 – 11:30	Virtual document review with [Name] (HR Manager)	
00.00	"Real time" review of wage and hours records (8 x set of 3 = 24)	



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

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



8. Appendix III: List of 195 "highly relevant" keys

ID	Key	Number	Section	Sub-Section	Main Text
1	cl-1	RH-CHI-1	RECRUITMENT & HIRING	Child Labor	Does the facility verify minimum age requirements prior to hiring workers?
2	cl-12	RH-CHI-2	RECRUITMENT & HIRING	Child Labor	What is the age of the youngest worker in the facility?
3	rh-chi-13	RH-CHI-4	RECRUITMENT & HIRING	Child Labor	Were any workers under the legal minimum working age when hired?
4	cl-410	RH-CHI-18	RECRUITMENT & HIRING	Child Labor	Are protective restrictions for workers under the age of 18 in line with legal requirements?
5	cl-412-1x	RH-CHI-20-1	RECRUITMENT & HIRING	Child Labor	Work in a hazardous environment and/or work that is hazardous in nature in violation of legal standards
6	rh-chi-11	RH-CHI-21	RECRUITMENT & HIRING	Child Labor	Have there been any incidences of forced labor, including sale and trafficking, prostitution, pornography, or illegal activities involving workers under age 18, or work that exposes them to physical, psychological or sexual abuse?
7	fl-1	RH-REC-1	RECRUITMENT & HIRING	Recruitment Practices	Are any monetary deposits required of workers?
8	rh-rec-4	RH-REC-2	RECRUITMENT & HIRING	Recruitment Practices	Are monetary deposits out of line with legal requirements?
9	fl-31	RH-REC-4	RECRUITMENT & HIRING	Recruitment Practices	Is the facility's recruitment process for foreign migrant workers in line with applicable legal requirements?
10	fl-4	RH-REC-5	RECRUITMENT & HIRING	Recruitment Practices	Who is responsible for paying recruitment fees and related costs, the worker or the facility?
11	fl-44	RH-REC-7	RECRUITMENT & HIRING	Recruitment Practices	Are workers reimbursed for recruitment fees and related costs paid?
12	fl-45	RH-REC-8	RECRUITMENT & HIRING	Recruitment Practices	Are recruitment fees and related costs paid by workers in line with legal requirements?
13	fl-5	RH-FOR-1	RECRUITMENT & HIRING	Forced Labor	Does the facility use prison labor?
14	rh-for-3	RH-FOR-2-1	RECRUITMENT & HIRING	Forced Labor	Prison laborers have not freely and formally consented to perform the work
15	rh-for-4	RH-FOR-2-2	RECRUITMENT & HIRING	Forced Labor	The facility does not treat prison laborers and non-prison workers similarly (conditions of work such as wages, hours of work, health and safety, etc.)
16	rh-for-5	RH-FOR-2-3	RECRUITMENT & HIRING	Forced Labor	There is no supervision and control by a public authority
17	disc-1	RH-DIS-1	RECRUITMENT & HIRING	Discrimination	During the recruitment process, do materials such as job description or job application forms ever reference an applicant's race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age (other than the legal minimum age) or nationality/foreign migrant worker status?
18	rh-dis-3	RH-DIS-3	RECRUITMENT & HIRING	Discrimination	Are written job descriptions or job application forms that reference an applicant's race / ethnic group / skin color in line with applicable legal requirements?
19	rh-dis-4	RH-DIS-4	RECRUITMENT & HIRING	Discrimination	Are written job descriptions or job application forms that reference an applicant's sex or gender in line with legal requirements?
20	rh-dis-5	RH-DIS-5	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's religion in line with legal requirements?



21	rh-dis-6	RH-DIS-6	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's political opinion in line with legal requirements?
22	rh-dis-7	RH-DIS-7	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's national extraction in line with legal requirements?
23	rh-dis-8	RH-DIS-8	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's social origin in line with legal requirements?
24	rh-dis-9	RH-DIS-9	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's disability in line with legal requirements?
25	rh-dis-11	RH-DIS-11	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's sexual orientation in line with legal requirements?
26	rh-dis-12	RH-DIS-12	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's pregnancy / maternity status in line with legal requirements?
27	rh-dis-13	RH-DIS-13	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's marital status in line with legal requirements?
28	rh-dis-14	RH-DIS-14	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's age in line with legal requirements?
29	rh-dis-15	RH-DIS-15	RECRUITMENT & HIRING	Discrimination	Are written job description or job application forms that reference an applicant's nationality/foreign migrant status in line with legal requirements?
30	rh-dis-19	RH-DIS-18	RECRUITMENT & HIRING	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age (other than the legal minimum age) or nationality/foreign migrant worker status been a factor in decisions regarding hiring?
31	rh-dis-20	RH-DIS-20	RECRUITMENT & HIRING	Discrimination	Is an applicant's race / ethnic group / skin color factored into hiring decisions in line with legal requirements?
32	rh-dis-21	RH-DIS-21	RECRUITMENT & HIRING	Discrimination	Is an applicant's sex / gender factored into hiring decisions in line with legal requirements?
33	rh-dis-22	RH-DIS-22	RECRUITMENT & HIRING	Discrimination	Is an applicant's religion factored into hiring decisions in line with legal requirements?
34	rh-dis-23	RH-DIS-23	RECRUITMENT & HIRING	Discrimination	Is an applicant's political opinion factored into hiring decisions in line with legal requirements?
35	rh-dis-24	RH-DIS-24	RECRUITMENT & HIRING	Discrimination	Is an applicant's national extraction factored into hiring decisions in line with legal requirements?
36	rh-dis-25	RH-DIS-25	RECRUITMENT & HIRING	Discrimination	Is an applicant's social origin factored into hiring decisions in line with legal requirements?
37	rh-dis-26	RH-DIS-26	RECRUITMENT & HIRING	Discrimination	Is an applicant's HIV / AIDS status factored into hiring decisions in line with legal requirements?
38	rh-dis-27	RH-DIS-27	RECRUITMENT & HIRING	Discrimination	Is an applicant's sexual orientation factored into hiring decisions in line with legal requirements?
39	rh-dis-28	RH-DIS-28	RECRUITMENT & HIRING	Discrimination	Is an applicant's pregnancy / maternity status factored into hiring decisions in line with legal requirements?
40	rh-dis-29	RH-DIS-29	RECRUITMENT & HIRING	Discrimination	Is an applicant's marital status factored into hiring decisions in line with legal requirements?
41	rh-dis-30	RH-DIS-30	RECRUITMENT & HIRING	Discrimination	Is an applicant's age factored into hiring decisions in line with legal requirements?
42	rh-dis-31	RH-DIS-31	RECRUITMENT & HIRING	Discrimination	Is an applicant's nationality/foreign migrant status factored into hiring decisions in line with legal requirements?



43	rh-dis-33	RH-DIS-32	RECRUITMENT & HIRING	Discrimination	Are an applicant's family responsibilities factored into hiring decisions in line with legal requirements?
44	disc-3-1x	RH-DIS-34-1	RECRUITMENT & HIRING	Discrimination	Facility requires pregnancy test before or at hiring
45	rh-dis-42	RH-DIS-35	RECRUITMENT & HIRING	Discrimination	Facility requires pregnancy tests that are not required by applicable legislation
46	disc-3-2x	RH-DIS-35-1	RECRUITMENT & HIRING	Discrimination	Facility requires virginity test before or at hiring
47	disc-3-3x	RH-DIS-35-2	RECRUITMENT & HIRING	Discrimination	Facility requires worker to provide commitments (verbally or in writing) that they will not become pregnant
48	ер-3	RH-EMP-8	RECRUITMENT & HIRING	Employment Practices	Do all persons who perform work for the facility, both on the premises and offsite, have a contract?
49	ep-31	RH-EMP-9	RECRUITMENT & HIRING	Employment Practices	Are contracts for all persons who perform work for the facility, both on the premises and offsite, in line with legal requirements?
50	rh-emp-13	RH-EMP-11- 1	RECRUITMENT & HIRING	Employment Practices	When making changes to contracts, the facility does not seek the written agreement of the affected worker
51	rh-emp-14	RH-EMP-11- 2	RECRUITMENT & HIRING	Employment Practices	Signed copies of contracts between the facility and each worker are not maintained on file
52	rh-emp-15	RH-EMP-11- 3	RECRUITMENT & HIRING	Employment Practices	Contracts do not clearly and accurately state the terms and conditions of employment
53	rh-emp-16	RH-EMP-11- 4	RECRUITMENT & HIRING	Employment Practices	Copies of contracts are not provided to workers, in line with applicable legal requirements
54	ер-7	RH-EMP-26	RECRUITMENT & HIRING	Employment Practices	Has the facility acted against legal requirements by hiring temporary/probationary/trainee/fixed-term contract workers to avoid legal obligations?
55	rh-hom-1	RH-HOM-1	RECRUITMENT & HIRING	Homeworkers	Does the facility comply with applicable legal requirements concerning homeworkers?
56	wh-3	WH-WOR-3	WORKING HOURS	Working Hours	Does the facility maintain only one accurate set of working hour records?
57	wh-31-5x	WH-WOR-4-5	WORKING HOURS	Working Hours	Working hour records are consistent with payroll and other records
58	wh-6	WH-WOR-11	WORKING HOURS	Working Hours	Are all overtime working hours in line with legal limits?
59	wh-7	WH-WOR-16	WORKING HOURS	Working Hours	Did any workers work more than 60 hours in total (regular + overtime) within any given week?
60	wh-71	WH-WOR-17	WORKING HOURS	Working Hours	Did any workers work more than 72 hours in total (regular + overtime) within any given week?
61	wh-72	WH-WOR-18	WORKING HOURS	Working Hours	Did any workers work more than 80 hours in total (regular + overtime) within any given week?
62	wh-73	WH-WOR-19	WORKING HOURS	Working Hours	Did any workers work more than 90 hours in total (regular + overtime) within any given week?
63	wh-81	WH-WOR-21	WORKING HOURS	Working Hours	Does the facility provide time off for breastfeeding in line with legal requirements?
64	wh-wor-20	WH-WOR-23	WORKING HOURS	Working Hours	Number of weekly rest days (at least 24 consecutive hours long) provided by the facility:
65	wh-91	WH-WOR-24	WORKING HOURS	Working Hours	Are the weekly rest days provided by the facility in line with legal requirements?
66	wb-wag-68	WH-WOR-25	WORKING HOURS	Working Hours	Is the facility failing to correctly provide workers time off for any of these types of leave, as legally required: • All public holidays • Annual leave • Sick leave



					 Maternity leave Paternity leave Personal leave Other types of required leave (which may include country-specific leave requirements)?
67	fl-71	WH-FOR-1	WORKING HOURS	Forced Labor	Are workers forced to work overtime under threat of penalty?
68	wh-ove-1	WH-OVE-1	WORKING HOURS	Overtime	Are workers able to refuse overtime for ANY REASON?
69	wh-ove-2	WH-OVE-2	WORKING HOURS	Overtime	Is overtime voluntary, in line with legal requirements?
70	wh-ove-6	WH-OVE-6	WORKING HOURS	Overtime	When production/volume is lower than expected, how are workers impacted? (SELECT all that apply with a "X")
71	wh-ove-7	WH-OVE-6-1	WORKING HOURS	Overtime	No impact to workers (workers receive their regular pay and come to work)
72	wh-ove-8	WH-OVE-6-2	WORKING HOURS	Overtime	Workers must stay at home and are required to use vacation time/paid time off
73	wh-ove-9	WH-OVE-6-3	WORKING HOURS	Overtime	Worker's hours are reduced
74	wh-ove-10	WH-OVE-6-4	WORKING HOURS	Overtime	Workers must stay at home and are paid legal minimum wage
75	wh-ove-11	WH-OVE-6-5	WORKING HOURS	Overtime	Workers must stay at home and are paid less than legal minimum wage
76	wh-ove-12	WH-OVE-6-6	WORKING HOURS	Overtime	Workers must stay at home and are not paid
77	wh-ove-13	WH-OVE-6-7	WORKING HOURS	Overtime	Other action impacting workers
78	wh-ove-14f	WH-OVE-6.1	WORKING HOURS	Overtime	If other, please describe:
79	wb-22	WB-WAGE-2	WAGES & BENEFITS	Wages and Benefits	Does the facility maintain only one accurate payroll record?
80	wb-21-2x	WB-WAGE-3- 2	WAGES & BENEFITS	Wages and Benefits	Payroll records are consistent with attendance records and other records
81	wb-wage-1	WB-WAGE-3- 3	WAGES & BENEFITS	Wages and Benefits	Payroll records do not show all the types of social insurance the workers are paid
82	wb-wage-2	WB-WAGE-4	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay any worker AT LEAST the legal minimum wage for any regular hours worked?
83	wb-wage-3	WB-WAGE-5- 1	WAGES & BENEFITS	Wages and Benefits	Permanent workers
84	wb-wage-4	WB-WAGE-5- 2	WAGES & BENEFITS	Wages and Benefits	Temporary workers
85	wb-wage-5	WB-WAGE-5- 3	WAGES & BENEFITS	Wages and Benefits	Casual workers
86	wb-wag-7x	WB-WAGE-5- 4	WAGES & BENEFITS	Wages and Benefits	Part-time workers
87	wb-wag-8x	WB-WAGE-5- 5	WAGES & BENEFITS	Wages and Benefits	Agency/contract workers
88	wb-wag-9x	WB-WAGE-5-	WAGES & BENEFITS	Wages and Benefits	Contract workers who are not part of the production process



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89	wb-wag-10x	WB-WAGE-5- 7	WAGES & BENEFITS	Wages and Benefits	Workers under probation
90	wb-wag-11x	WB-WAGE-5-	WAGES & BENEFITS	Wages and Benefits	Workers who are trainees, apprentices or interns
91	wb-wage-6	WB-WAGE-6	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay any worker AT LEAST the basic wage required under their employment contract for any regular hours worked?
92	wb-wage-7	WB-WAGE-7	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay any worker AT LEAST the basic wage required under the Collective Bargaining Agreement for any regular hours worked?
93	wb-wage-8	WB-WAGE-8	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay workers overtime in line with legal requirements (Incl. overtime rate and types of overtime)?
94	wb-wag-12	WB-WAGE-9	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay workers correctly for any of these types of overtime hours, as legally required: Ordinary overtime hours Overtime hours performed at night Overtime hours performed on weekly rest days Overtime hours performed on public holidays?
95	wb-wag-13	WB-WAGE- 12	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay workers correctly for any of these types of regular hours worked at a premium rate, as legally required: Regular hours worked at night Regular hours worked on weekly rest days Regular hours worked on public holidays?
96	wb-14	WB-WAGE- 94	WAGES & BENEFITS	Wages and Benefits	Are wage payments made regularly and on time and in line with legal requirements?
97	wb-wag-43	WB-WAGE- 95	WAGES & BENEFITS	Wages and Benefits	Are workers paid their full wages in the legally required manner?
98	wb-16	WB-WAGE- 106	WAGES & BENEFITS	Wages and Benefits	Are workers informed about their individual wages and deductions in line with legal requirements (e.g. through pay slips)?
99	wb-wage-64	WB-WAGE- 110	WAGES & BENEFITS	Wages and Benefits	Do workers have the ability to dispute and correct wage payments in the event of an error?
100	wb-wag-46	WB-WAGE- 116	WAGES & BENEFITS	Wages and Benefits	Does the facility take any deductions from wages that are not in line with legal requirements?
101	wb-wage-65	WB-WAGE- 121	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to collect and forward social insurance or social security contributions for workers in line with legal requirements?
102	wb-wage-75	WB-WAGE- 123	WAGES & BENEFITS	Wages and Benefits	Does the facility register their workers with social security institutions, in line with legal requirements?
103	wb-wage-76	WB-WAGE- 124	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to contribute the legally required amount for all legally required types of social insurance/social security?
104	wb-wag-111	WB-WAGE-	WAGES & BENEFITS	Wages and Benefits	Vietnam: Does the facility collect and forward workers' contributions as legally required and pay the legally



		126			required employer contributions to social, health and unemployment insurance funds on time?
105	wb-wag-94	WB-WAGE- 129	WAGES & BENEFITS	Wages and Benefits	Does the facility provide legally required compensation/ benefits related to social protection directly to workers (e.g. old age, accident, illness and death benefits)?
106	wb-wage-90	WB-WAGE- 135	WAGES & BENEFITS	Wages and Benefits	If the facility has overdue social insurance / social security debts due to non-payment or untimely payment of contributions, is the facility actively correcting this legal non-compliance?
107	wb-wage-91	WB-WAGE- 136	WAGES & BENEFITS	Wages and Benefits	Has the facility been subject to any fines or sanctions related to social insurance/ social security?
108	wb-wag-78	WB-WAGE- 144	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to correctly pay workers for any of these types of leave, as legally required: *All public holidays *Annual leave * Sick leave * Maternity leave * Paternity leave * Personal leave * Other types of required leave?
109	wt-for-2	WT-FOR-1	WORKER TREATMENT	Forced Labor	Does the employer use any other coercive tactics to force workers to work?
110	hb-1	WT-FOR-2	WORKER TREATMENT	Forced Labor	Have any cases of violence or threats of violence to intimidate workers and force them to work occurred at the workplace?
111	hb-2	WT-FOR-6	WORKER TREATMENT	Forced Labor	Have any cases of threats, such as reporting to authorities, deportation or threats against a worker's family/close associates, or cancelation of visa or other documents (e.g. work permits, residence permits, etc.) occurred in order to force migrant workers to stay at the job?
112	hb-3	WT-FOR-7	WORKER TREATMENT	Forced Labor	Have workers been forced to work as a disciplinary measure or as punishment for participation in a strike?
113	fl-91	WT-FOR-9	WORKER TREATMENT	Forced Labor	Are workers restricted from leaving the workplace in order to force them to work?
114	wt-for-5	WT-FOR-10	WORKER TREATMENT	Forced Labor	Are workers free to come and go from the dormitories and the industrial park or zone in which the facility is located?
115	wt-for-6	WT-FOR-11	WORKER TREATMENT	Forced Labor	Do workers keep all of their original personal documents (such as birth certificates, passports, work permits and ID cards)?
116	fl-141	WT-FOR-12	WORKER TREATMENT	Forced Labor	Have workers been denied access to any of their original personal documents (such as birth certificates, passports, work permits and ID cards) when they need them?
117	hb-4	WT-HAR-1	WORKER TREATMENT	Harassment and Abuse	Have there been any cases of physical, verbal, psychological harassment, violence or abuse?
118	hb-5	WT-HAR-12	WORKER TREATMENT	Harassment and Abuse	Have there been any cases of harassment based upon race, ethnic group, skin color, religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, gender identity, pregnancy/maternity status, marital status, family responsibilities, age, nationality/foreign migrant worker status?
119	wt-dis-2	WT-DIS-1	WORKER TREATMENT	Discrimination	Have there been cases of sexual harassment?
120	wt-dis-6	WT-DIS-6	WORKER TREATMENT	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign migrant worker status been a factor in decisions regarding compensation?



121	wt-dis-24	WT-DIS-8	WORKER TREATMENT	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign migrant worker status been a factor in decisions regarding conditions of work?
122	wt-dis-47	WT-DIS-17	WORKER TREATMENT	Discrimination	How many workers became disabled for a work-related reason?
123	wt-dis-35	WT-DIS-22	WORKER TREATMENT	Discrimination	If yes, are these infection or illness tests administered in line with legal requirements?
124	wi-foa-2	WI-FOA-1	WORKER INVOLVEMENT	FOA & CB	Are workers free to form a trade union of their choosing?
125	wi-foa-3	WI-FOA-2	WORKER INVOLVEMENT	FOA & CB	Are workers free to join a trade union of their choosing?
126	wi-foa-35	WI-FOA-46	WORKER INVOLVEMENT	FOA & CB	Does the employer allow workers to carry out trade union activities in accordance with applicable legal requirements?
127	foa-cb-4	WI-FOA-47	WORKER INVOLVEMENT	FOA & CB	Are workers and workers' representatives free to meet without the presence of management?
128	foa-cb-43	WI-FOA-49	WORKER INVOLVEMENT	FOA & CB	Has the facility management tried to control, manipulate or interfere with any of the unions in the facility?
129	foa-cb-47- 1x	WI-FOA-51-1	WORKER INVOLVEMENT	FOA & CB	Threatened intimidated, or harassed
130	foa-cb-47- 2x	WI-FOA-51-2	WORKER INVOLVEMENT	FOA & CB	Punished
131	foa-cb-47- 3x	WI-FOA-51-3	WORKER INVOLVEMENT	FOA & CB	Terminated workers or did not renew their contract
132	wi-foa-37	WI-FOA-52	WORKER INVOLVEMENT	FOA & CB	Were terminations of trade union official(s) (if any) in line with applicable legal requirements?
133	wi-foa-71	WI-FOA-53	WORKER INVOLVEMENT	FOA & CB	Do Trade Union representatives have time off to carry out their representative functions?
134	wi-foa-72	WI-FOA-54	WORKER INVOLVEMENT	FOA & CB	Do Trade Union representatives have time off to attend relevant trainings or meetings outside the factory?
135	wi-foa-73	WI-FOA-55	WORKER INVOLVEMENT	FOA & CB	Are Trade Union Officers from the Federation/External Trade Union granted access to meet with Trade Union members' representatives?
136	wi-foa-39	WI-FOA-81	WORKER INVOLVEMENT	FOA & CB	If the facility has no trade union, are workers free to choose their non-union representatives?
137	erg-21	WI-WOR-2	WORKER INVOLVEMENT	Workplace Cooperation	Has the facility threatened, intimidated, harassed, punished, terminated or not renewed worker contracts due to their worker representative role or activities?
138	wi-wor-21	WI-WOR-5	WORKER INVOLVEMENT	Workplace Cooperation	Are workers aware of the committee's role and advantages?
139	wi-wor-23	WI-WOR-14	WORKER INVOLVEMENT	Workplace Cooperation	Were at least two-thirds of the meetings attended by 100 % of members?
140	wi-gri-11	WI-GRI-2	WORKER INVOLVEMENT	Grievance Systems	How often has the grievance mechanism been used in the assessment period?
141	wi-whi-1	WI-WHI-1	WORKER INVOLVEMENT	Whistleblower Systems	Does the facility have a whistleblower system in place?
142	hs-gen-7	HS-GEN-14	HEALTH & SAFETY	General Work Environment	Are the facility's waste disposal practices in line with legal requirements?
143	hs-gen-10	HS-GEN-28	HEALTH & SAFETY	General Work Environment	Are workers allowed access to toilets/restrooms at any time?



			HEALTH & SAFETY	General Work Environment	Are workers allowed access to drinking water at any time?
45	hs-bui-1	HS-BUI-1	HEALTH & SAFETY	Building Safety	Are building/construction, structural safety and fire permits and certificates in line with legal requirements?
46	hs-8	HS-BUI-2	HEALTH & SAFETY	Building Safety	Do approved building plans reflect the current building's structure and use?
47	hs-82	HS-BUI-3	HEALTH & SAFETY	Building Safety	Have there been and/or are there currently cases of concern about the physical integrity and stability of the facility?
48	hs-83	HS-BUI-4	HEALTH & SAFETY	Building Safety	Are facility doors, exits and stairs in line with legal requirements?
49	hs-ris-1	HS-RIS-2	HEALTH & SAFETY	Risk Assessment	Has the facility conducted a health and safety risk assessment in line with legal requirements?
50	hs-193	HS-EME-3	HEALTH & SAFETY	Emergency Preparedness	Does the facility have a fire detection and alarm system in place?
51	hs-eme-1	HS-EME-4	HEALTH & SAFETY	Emergency Preparedness	Is the fire detection and alarm system in line with legal requirements?
52	hs-eme-8	HS-EME-5	HEALTH & SAFETY	Emergency Preparedness	Is there a manual or automatic emergency alarm system (for all types of emergencies other than fire)?
53	hs-eme-2	HS-EME-6	HEALTH & SAFETY	Emergency Preparedness	Is the emergency alarm system (for all types of emergencies other than fire) in line with legal requirements?
54	hs-195-1x	HS-EME-7-1	HEALTH & SAFETY	Emergency Preparedness	Emergency alarm system is fully functioning
55	hs-195-2x	HS-EME-7-2	HEALTH & SAFETY	Emergency Preparedness	Emergency alarm system is regularly maintained and inspected/ tested
56	hs-204	HS-EME-8	HEALTH & SAFETY	Emergency Preparedness	Does the facility have legally required firefighting equipment?
57	hs-203-4x	HS-EME-9	HEALTH & SAFETY	Emergency Preparedness	Does the facility regularly test and service fire extinguishers and other firefighting equipment in line with legal requirements?
58	hs-eme-9	HS-EME-10-3	HEALTH & SAFETY	Emergency Preparedness	Fire Fighting equipment is accessible
59	hs-206	HS-EME-11	HEALTH & SAFETY	Emergency Preparedness	Has the facility trained workers to use fire-fighting equipment in line with legal requirements?
60	hs-22-1x	HS-EME-13	HEALTH & SAFETY	Emergency Preparedness	Are there sufficient emergency exits from all work stations and rest areas, and on every floor?
61	hs-22-2x	HS-EME-14	HEALTH & SAFETY	Emergency Preparedness	Are all emergency exits clearly marked?
62	hs-22-4x	HS-EME-15	HEALTH & SAFETY	Emergency Preparedness	Are all emergency exits accessible, unobstructed and unlocked during working hours (including overtime) and lead to a place of safety?
63	hs-22-3x	HS-EME-16-1	HEALTH & SAFETY	Emergency Preparedness	Emergency exits are illuminated and visible when it is dark or there is smoke
64	hs-22-5x	HS-EME-16-2	HEALTH & SAFETY	Emergency Preparedness	Emergency exit doors open outwards or are securely kept open during working hours
65	hs-232	HS-EME-17	HEALTH & SAFETY	Emergency Preparedness	Are emergency exits in line with other legal requirements?
66	hs-23	HS-EME-18	HEALTH & SAFETY	Emergency Preparedness	Does the facility conduct regular emergency drills for all workers and are they in line with legal requirements?
67	hs-eme-10	HS-EME-19-3	HEALTH & SAFETY	Emergency Preparedness	All workers with disabilities or special needs are assisted by pre-assigned partners during emergency drill and in case of actual emergency
68	hs-eme-11	HS-EME-21	HEALTH & SAFETY	Emergency Preparedness	Does the facility have a legally required Fire Brigade/Emergency Response Team of designated workers with special responsibilities for fire safety?



169	hs-che-13	HS-CHE-5	HEALTH & SAFETY	Chemicals and Hazardous Substances	Has all legally required action been taken to assess, monitor and prevent environmental exposure to chemicals and hazardous substances?
170	hs-261-2x	HS-CHE-8	HEALTH & SAFETY	Chemicals and Hazardous Substances	Are Safety Data Sheets ("SDS", formerly MSDS) available for all chemicals used in the workplace in line with legal requirements?
171	hs-261-4x	HS-CHE-9	HEALTH & SAFETY	Chemicals and Hazardous Substances	Are chemicals and hazardous substances stored in line with legal requirements?
172	hs-wor-8	HS-WOR-2	HEALTH & SAFETY	Worker Protection	Is required Health and Safety training for workers offered free of charge and does it take place during working hours?
173	hs-wor-9	HS-WOR-6	HEALTH & SAFETY	Worker Protection	Do any occupational safety and health measures, including collective measures or personal protective equipment, involve any cost to workers?
174	hs-32-11x	HS-WOR-10	HEALTH & SAFETY	Worker Protection	Does the facility have legally required and up to date permits/ certificates/ licenses for the installation/ operation/ maintenance of special machines and equipment (e.g., electrical installations, generator, boiler, other pressure vessels, lifting equipment, elevators and/or welding)?
175	hs-32-12x	HS-WOR-11	HEALTH & SAFETY	Worker Protection	Do operators/ technicians for machinery, equipment, electrical installations, boiler, lifting equipment, and/or welding have legally required license/ permit/ certification/ training?
176	hs-wor-17	HS-WOR-22	HEALTH & SAFETY	Worker Protection	Does the facility have any work areas with risk of heat or cold stress (extreme hot or cold temperature areas)?
177	hs-ele-14	HS-ELE-1	HEALTH & SAFETY	Electrical Safety	Are electrical wires, cables, switches, plugs, panels, distribution boards, and equipment (e.g. transformers, generators, compressors, circuit breakers) installed, grounded (for equipment), maintained and in line with legal requirements?
178	hs-42	HS-ELE-2	HEALTH & SAFETY	Electrical Safety	Is electrical equipment inspection and maintenance carried out by a certified, competent and authorized entity (i.e. is the electrician licensed) in line with legal requirements?
179	hs-fir-30	HS-FIR-5	HEALTH & SAFETY	First Aid and Medical	Are arrangements in case of medical emergency, including on-site medical facilities/clinic(s) and staff in line with legal requirements?
180	hs-fir-4	HS-FIR-7	HEALTH & SAFETY	First Aid and Medical	Are workers allowed access to on-site medical facilities at any time?
181	hs-52	HS-FIR-10	HEALTH & SAFETY	First Aid and Medical	Does the facility record work-related accidents and diseases and report them to the competent authority in line with legal requirements?
182	hs-551	HS-DOR-1	HEALTH & SAFETY	Dormitories	Are building/construction, structural safety and fire permits and certificates for housing/dormitories in line with legal requirements?
183	hs-553	HS-DOR-6	HEALTH & SAFETY	Dormitories	Are housing/dormitories in line with all other health and safety legal requirements?
184	hs-dor-26	HS-DOR-7	HEALTH & SAFETY	Dormitories	Are building/construction, structural safety and fire permits and certificates for off-site housing sites not managed and controlled by the facility in line with legal requirements?
185	hs-561	HS-CAN-1	HEALTH & SAFETY	Canteens	Are onsite canteens in line with legal requirements?
186	hs-562-7x	HS-CAN-4	HEALTH & SAFETY	Canteens	Do food service workers have valid health/sanitation certificates/permits, as legally required?
187	hs-572	HS-CHI-1	HEALTH & SAFETY	Childcare	Are on-site childcare facilities in line with legal requirements?
188	hs-chil-1	HS-CHIL-1	HEALTH & SAFETY	Children	Are children below the legal minimum age for employment allowed in the production area, even if they are not working?
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189	ter-for-3	TER-FOR-2	TERMINATION	Forced Labor	Does any worker owe debts to the facility and/or a third party?
190	ter-for-2	TER-FOR-3	TERMINATION	Forced Labor	Can workers who owe debts to the facility and/or a third party freely leave their jobs?
191	fl-14	TER-FOR-4	TERMINATION	Forced Labor	Has the facility ever withheld - or threatened to withhold - or delayed wage payments in order to keep workers at the facility?
192	fl-15	TER-FOR-5	TERMINATION	Forced Labor	Are workers free to terminate their employment after their notice period and/or contract expiry?
193	ter-dis-2	TER-DIS-1	TERMINATION	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign migrant worker status been a factor in decisions regarding termination, forced resignation, retrenchment or retirement?
194	disc-13	TER-DIS-4	TERMINATION	Discrimination	Has termination, forced resignation, retrenchment or retirement ever occurred due to a worker filing a complaint or taking part in proceedings against the facility?
195	ter-dis-4	TER-DIS-5	TERMINATION	Discrimination	Are facility practices failing to comply with any legal requirements not covered elsewhere regarding Discrimination in Termination?