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## **Social and Labor Convergence Program (SLCP) Verification Protocol**

**June 29, 2020**

**Change Log**

<b>Date</b>	<b>Section</b>	<b>Change Summary</b>
2019/11/27	Glossary	Multiple terms updated to match our one, standard SLCP glossary
2019/11/27	Overview of the SLCP Assessment Process - 2019 Data Hosting & Sharing	Diagram with new details about Passive Accredited Host and sharing
2019/11/27	Details of the SLCP Assessment Process	Improved explanation of timeline/ timeframe
2019/11/27	Pre-Onsite Verification Actions - 2. Facility discusses verification cost/timeline offline with VBs	Place to find date of Self/Joint-Assessment submission
2019/11/27	Pre-Onsite Verification Actions - 9. VB/ Verifier reviews Self/ Joint-Assessment to determine correct person-day requirements	More details around person-day requirements and documentation review
2019/11/27	Onsite Verification Actions - 14. Verifier conducts onsite verification	Requirement to use translators who are trained to understand social compliance topics.  Wage and hour record sampling: If there are no clear high and low production months, then the selection must be random.
2019/11/27	Annex III Verification Communication Template (suggested communication)	Information on on-site verification that must occur no more than 2 months after the completion of the Self/ Joint-Assessment.
2020/06/29	Entire document	Updating of hyperlinks and email addresses throughout the document  Edits to make language clearer
2020/06/29	Entire document	Additions related to COVID-19, e.g. verification scheduling, onsite verification procedures, etc.
2020/06/29	New Annex III: COVID-19 – Enhancement to Verified Assessment Report Information	Annex III gives detailed instructions on how to include COVID-19 information, as applicable, in the self/joint-assessment and verification
2020/06/29	Terms of Use	New CAF Terms of Use as referenced on the Gateway
2020/06/29	Glossary	Additions to the Glossary
2020/06/29	Overview of the SLCP Assessment Process	Inclusion of short statement about Verification Data for “Accurate” items (more details included in Verifier Guidance)  Updated graphic to explain the assessment process

2020/06/29	Eligibility of Verifiers	Clearer language about eligibility to conduct a verification  Reference to Verifier Status Maintenance
2020/06/29	Details of the SLCP Assessment Process	Added new statuses of VRE, VRQ and made some additions/ changes to timeframes for edit/review by Verifier and facility  Updated visual of SLCP assessment process with VRQ, VRE
2020/06/29	3.-5. Facility account creation on AH platform, initiating self/joint-assessment, completing self/joint-assessment	Note for newly operation facilities; min. 3 months data required in self-assessment
2020/06/29	7. VB assigns Verifier on Gateway	Ensuring meaning of no two verifications in a row by same Verifier is clear
2020/06/29	9. VB/ Verifier reviews self/joint-assessment to determine correct person-day requirements	More clarity on person-day assignments if step 1+2 or step 1+2+3 is selected
2020/06/29	11. Verifier reviews self/joint-assessment in detail to prepare for onsite verification, including facility background check	Background check addition: previous social audit/ SLCP reports
2020/06/29	14. Verifier conducts onsite verification (opening meeting, walk through, interviews, document review, closing meeting)	Additions to: <ul style="list-style-type: none"> <li>○ clarify potential change to person-days when onsite;</li> <li>○ ensure all types of production employees are considered in verification;</li> <li>○ clarify language requirements;</li> <li>○ remind Verifier to add translator information in Verification Details</li> <li>○ add detail around management interviews;</li> <li>○ cover the topic of denied access</li> </ul>
2020/06/29	15. Verifier focuses on Verification Summary; addresses facility questions/ concerns during closing meeting	Addition of Verifier guidance around reporting verified assessment data to users other than the facility
2020/06/29	16.-20. Resolving facility concerns, filling in Tool, completing report online to run AH checks, VB quality check, VRQ check with VRE edits, changing assessment status to VRC	Explanation of new statuses VRQ and VRE and Verifier responsibilities  Recommendation for Verifier/ Verifier Body downloading of verified assessment report for document retention
2020/06/29	21.-24. Facility reviews verified assessment, connects offline with Verifier/ VB for concerns and	Explanation of new status VRE and Verifier responsibilities

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	requests edits as necessary, accepts verification or raises Dispute	New timeframe for facility report finalization as multiple edit rounds can occur (14 calendar days instead of 10)
2020/06/29	Annex IV Verification Communication Template (suggested communication)	Revision to make it easier to read/ understand  Addition of COVID-19 document reference
2020/06/29	Annex VII Additional On-site Verification Information	More details about what types of employees to interview  Management Interview guidance

**Table of Contents**

Terms of Use..... 7

Glossary..... 8

Overview of the SLCP Assessment Process ..... 10

Overview of the Converged Assessment Framework ..... 12

Introduction to the SLCP Verification Protocol ..... 13

Eligibility of Verifiers ..... 14

Details of the SLCP Assessment Process ..... 15

Pre-Onsite Verification Actions..... 21

    1. Account creation on Gateway ..... 21

    2. Facility discusses verification cost/timeline offline with VBs ..... 21

    3.-5. Facility account creation on AH platform, initiating self/joint-assessment, completing self/joint-assessment ..... 22

    6. Facility selects VB on AH platform ..... 23

    7. VB assigns Verifier on Gateway..... 23

    8. VB/ Verifier obtain access to self/joint-assessment on AH along with any uploaded documents ..... 24

    9. VB/ Verifier reviews self/joint-assessment to determine correct person-day requirements ... 24

    10. Verifier conducts off-site documents review, if applicable ..... 26

    11. Verifier reviews self/joint-assessment in detail to prepare for onsite verification, including facility background check ..... 27

    12. Pre-verification communication to facility (document list, verification planning information et al.) ..... 27

    13. Verifier downloads Data Collection Tool from AH platform for back-up during onsite verification..... 28

Onsite Verification Actions ..... 29

    14. Verifier conducts onsite verification (opening meeting, walk through, interviews, document review, closing meeting)..... 29

    15. Verifier focuses on Verification Summary; addresses facility questions/ concerns during closing meeting ..... 34

    16.-20. Resolving facility concerns, filling in Tool, completing report online to run AH checks, VB quality check, VRQ check with VRE edits, changing assessment status to VRC ..... 36

    21.-24. Facility reviews verified assessment, connects offline with Verifier/ VB for concerns and requests edits as necessary, accepts verification or raises Dispute ..... 37

    25. If accepted: facility shares verified assessment via the Gateway and/or the Accredited Host ..... 38

    26.-28. If Dispute: VOO deems substantiated or not substantiated ..... 38

    29. VOO Quality Assurance Procedures for accepted verified assessments ..... 38

Annex I Verifier Expectations ..... 40

Annex II: Filtering of Verifier Body and Verifier ..... 42

Annex III: COVID-19 – Enhancement to Verified Assessment Report Information ..... 44

Annex IV Verification Communication Template (suggested communication) ..... 52

Annex V Document List ..... 54

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**Annex VI SLCP Code of Conduct ..... 57**  
**Annex VII Additional On-site Verification Information..... 60**

**Disclaimer:**

*This file represents only one aspect of the SLCP assessment framework. The file should be viewed in conjunction with the other 2 elements of the Converged Assessment Framework: Data Collection Tool and Verifier Guidance.*

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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](mailto: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.

**“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 verification data gathering.

**“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 a facility can choose which one they want to use.

**“Converged Assessment Framework”** or **“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. Verification Protocol; and 3. Verifier Guidance.

**“CAF Assessment Process”** means a procedure, as developed in the context of SLCP, serving to implement the Converged Assessment Framework, starting with self/joint-assessment for facilities that is augmented via verification by external parties and verification oversight and a methodology for data sharing by the facility, Verifier and Accredited Host via the ITC Gateway.

**“Data Collection Tool”** or **“Tool”** Element 1 of the Converged Assessment Framework. ‘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 through an excel file downloadable from an Accredited Host.

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

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, Verifier Bodies 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.

**“Self-assessment”** Facility alone fills in the Data Collection Tool (CAF Element 1).

**“Joint-assessment”** Facility contracts outside help to fill in the Data Collection Tool (CAF Element 1).

**“SLCP”** means the Social & Labor Convergence Program (SLCP), an independent multi-stakeholder program which has developed the Converged Assessment Framework (CAF) and a data hosting and sharing process.

**“User”** means end users of the CAF including facilities, Verifier Bodies, Verifiers and Accredited Hosts, registered with the ITC Gateway to use the Service.

**“Verification Oversight Organization (VOO)”** Entity responsible for the day-to-day management of SLCP verifications. It manages the selection of Verifier Bodies 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, 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, and handles dispute resolution between a facility and a Verifier.

**“Verification Protocol”** Element 2 of the Converged Assessment Framework. The document that contains the procedures, rules and process requirements for conducting an SLCP verification.

**“Verified assessment”** uses the CAF and follows the CAF Assessment Process and results in a report in pdf,



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excel and html format made available to facilities and shareable by facilities on the ITC Gateway.

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

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

**“Verifier Guidance”** Element 3 of the Converged Assessment Framework. The document that helps Verifiers complete the verified assessment report by giving guidance on how to verify a facility’s answers to questions in the Data Collection Tool.

**Overview of the SLCP Assessment Process**

The SLCP process consists of three main steps:

- Step 1) Data Collection
- Step 2) Data Verification
- Step 3) Data Hosting and Sharing

<b>STEP 1: Data Collection</b>
Collection can be done by either self-assessment (facility only) or joint-assessment (facility + external assistance), online or offline by using the Data Collection Tool.
Self/joint-assessment can be carried out via an excel document downloaded from the Accredited Host (AH) or online via an AH platform. If the facility has a stable internet connection, it is recommended to use the online AH platform to complete the self/joint-assessment.
The objective of this Step 1 is for the facility to enter complete and accurate data into the Data Collection Tool. SLCP believes in facility ownership. In the SLCP process, the facility owns the process. They start it, and they own the data at the end of it. That is why SLCP asks the facility to first fill in the assessment data to get a full understanding of its working conditions.
<b>STEP 2: Data Verification</b>
The Verifier will check the correctness and completeness of the data gathered through the Data Collection Tool. They will confirm or provide corrections to the original self/joint-assessment data online on the AH platform or offline via an excel document downloaded from the AH. If you have a stable internet connection, it is recommended to use the online AH platform to complete the verification.
For each question in the Tool, even if the facility did not provide an answer in the self/joint-assessment, the Verifier must indicate “Accurate/ Inaccurate/ No Response Provided/ Updated during Verification” in the Data Collection Tool. If “Inaccurate/ No Response Provided/ Updated during Verification” the Verifier must enter a “Corrected Response” and “Verification Data” to support the corrected outcome. If “Accurate”, the Verifier is encouraged to provide “Verification Data” where there is a legal non-compliance or a concern relating to general social compliance norms. More information about how to complete the Data Collection Tool is in the <a href="#">Verifier Guidance</a> .
A Verification Oversight Organization (VOO) is in place to oversee the integrity of SLCP verification and quality of verified assessment data.
The objective of this Step 2 is to verify the completeness and correctness of data gathered in the self/joint-assessment. Verification of self/joint-assessment data is a crucial step in the SLCP process to ensure end-users’ acceptance of SLCP data and the replacement of their own audit methodologies with the SLCP process.
<b>STEP 3: Data Hosting &amp; Sharing</b>
The verified assessment report, with facility permission, will be shared through a semi-decentralized model with a Gateway and AHs.
The objective of this Step 3 is to enable a secure way of sharing verified data with Users so multiple Users can use the data to inform their (proprietary) social responsibility benchmarks and compliance programs.

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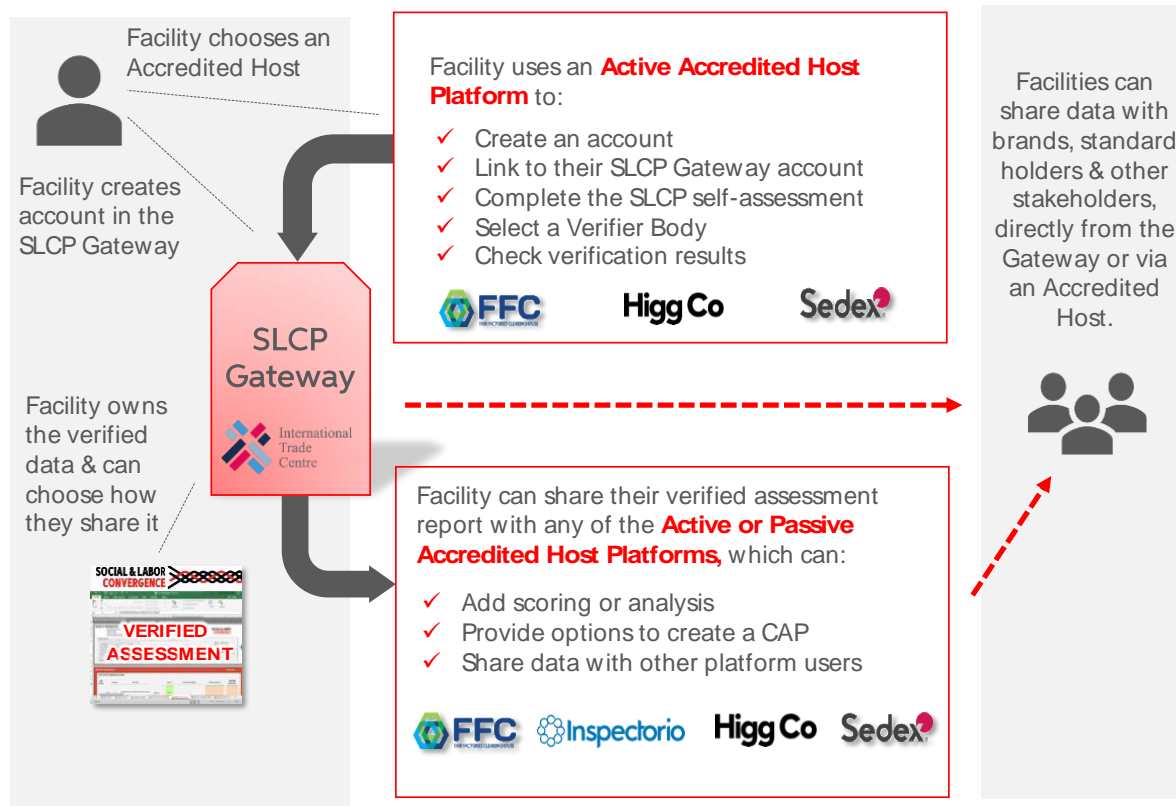
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Below is a visual depiction of the assessment process.

Note:

- The SLCP process begins with registration of all active parties on the Gateway.
- The Active Accredited Host is used to facilitate the data collection for self/joint-assessment and verification and sharing of verified data.
- The Passive Accredited Host only receives verified data from the Gateway, after completion of the full assessment process on an Active AH, and shares verified data with Users.

## SLCP System and Process



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**Overview of the Converged Assessment Framework**

It consists of three elements:

<b>Data Collection Tool</b>	<b>Verification Protocol</b>	<b>Verifier Guidance</b>
<ul style="list-style-type: none"> <li>• Used by facility &amp; Verifier</li> <li>• Records facility and verified data</li> <li>• Executed through AH online platform (recommended) or through downloadable excel from AH</li> </ul>	<ul style="list-style-type: none"> <li>• Used mainly by Verifier for verification methodology/ procedures/ rules</li> <li>• FYI for facility to understand verification process</li> </ul>	<ul style="list-style-type: none"> <li>• Used by Verifier</li> <li>• Detailed information about how to complete the Data Collection Tool and provide data for the verified assessment</li> </ul>

The Converged Assessment Framework is standard neutral. That means:

<b>SLCP Converged Assessment Framework does</b>	<b>SLCP Converged Assessment Framework does NOT</b>
<ul style="list-style-type: none"> <li>• Collect self-reported demographic, compliance related and performance information from facilities</li> <li>• Employ a robust verification process</li> <li>• Facilitate operation (data hosting &amp; sharing)</li> </ul>	<ul style="list-style-type: none"> <li>• Set minimum requirements</li> <li>• Be a scoring/ranking system, certification program or Code of Conduct</li> <li>• Provide corrective action plans or engage in other follow-up actions</li> </ul>

There is no judgement of the data collected through the SLCP process. It is objective data about the current social and labor conditions in a facility. This makes SLCP compatible with all compliance and certification programs. Users can use the data to come to their own conclusions and proceed with any applicable corrective action, remediation efforts or capacity/ capability building.

**Introduction to the SLCP Verification Protocol**

The SLCP Verification Protocol specifies procedures, rules and process requirements to complete the verification. The objective of the verification is to verify the completeness and correctness of data gathered in the self/joint-assessment.

It is important to highlight that this is not a conformance type of assessment/audit to determine to what extent working conditions comply with a certification or social compliance standard. To differentiate that this agnostic data collection (not dependent on a particular standard) and reporting varies from traditional compliance auditing, we use different terminology. This program will specify:

- **Verification** rather than Audit or Assessment
- **Verifier** rather than Auditor

“Audit”: A systematic review or assessment of something.

“Verification”: **The process of establishing the truth, accuracy, or validity of something.**

Source: Oxford University Press

Audit	SLCP Verification
<ul style="list-style-type: none"> <li>• <b>Inspection</b> by external party (2nd or 3rd party auditor) to assess social and labor conditions</li> <li>• <b>Pass or fail</b> regarding social and labor conditions topics</li> <li>• <b>Facility subject</b> to audit process</li> <li>• <b>Brand owner</b> of audit report and attached Corrective Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Verification of <b>facility assessment</b> of social and labor conditions</li> <li>• <b>Agnostic data</b> collection without judgement</li> <li>• Facility <b>active participant</b> in verification process, e.g. by providing facility information upfront</li> <li>• <b>Facility owner</b> of verified assessment report (facility permission needed for data sharing)</li> </ul>

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### **Eligibility of Verifiers**

Only SLCP approved Verifiers can produce a valid verified assessment report.

Verifiers will only be eligible for a specific verification if:

- They did not verify the facility's previous assessment (this rule applies even if a facility has moved locations);
- Their Verifier Body was not involved in the joint-assessment that is now undergoing verification.

For more information about the VB and Verifier application process, Verifier qualifications and Verifier Status Maintenance, please read the [SLCP Quality Assurance Manual](#).

In addition to specific Verifier criteria, SLCP has Verifier expectations (see Annex I) that address requirements in terms of ethics, Verifier behavior and competencies, and personal and facility safety. The Verifier must meet these expectations.

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### Details of the SLCP Assessment Process

In the Overview of the SLCP Assessment Process, we presented the 3 main Steps to the process. Now, we dive deeper into the process and present the:

- Activities/ actions of all SLCP actors
- SLCP assessment status associated with each applicable action
- Estimated timeline associated with each action.

More information, if applicable, to each Action Number will be presented following the summary table below.

#### SLCP Assessment Statuses:

ASI-Assessment Initiated	ASC-Assessment Completed			
VRP-Verification in Progress	VRQ-Verification Quality Check	VRE-Verification being Edited	VRC-Verification Completed	VRF-Verification Finalized
VRD-Verification Disputed	VRI-Verification Invalidated			

#### SLCP Actors:

F-Facility	V-Verifier	VB-Verifier Body	GW-Gateway	AH-Accredited Host	VOO-Verification Oversight Organization
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NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE <sup>1</sup>
			F	V	VB	GW	AH	VOO	
1.	Account creation on Gateway		✓	✓	✓	✓			<p style="text-align: center;"><b>Week 0</b></p> <p>All steps before Week 0 are prior to the start of the verification process. Note it takes facility on average 2 weeks to complete self/joint-assessment as Tool is complex and multiple individuals may be required to provide input/ documentation</p>
2.	Facility discusses verification cost/timeline offline with Verifier Bodies; note verification can be semi-announced with a 10-day window and cost/timeline will likely be estimates as self/joint-assessment information is needed to determine exact person-day requirements for verification		✓		✓				
3.	Facility creates account on Accredited Host platform using Facility ID from Gateway		✓				✓		
4.	Facility accesses Data Collection Tool through AH and initiates self/joint-assessment	ASI	✓				✓		
5.	Facility completes self/joint-assessment; recommend online	ASC	✓				✓		

<sup>1</sup> There are various factors that impact the actual assessment process timeline. This is the recommended timeframe. It is not a strict requirement unless explicitly noted in subsequent sections of the Protocol (e.g. time allowed between completion of self/joint-assessment and the onsite verification).

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NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE <sup>1</sup>
			F	V	VB	GW	AH	VOO	
	completion but download into excel from AH is available with final step of upload to AH required								
6.	Facility selects Verifier Body to conduct verification on Accredited Host platform	ASI or ASC	✓					✓	
7.	Verifier Body assigns Verifier on Gateway	VRP			✓	✓			
8.	Verifier Body/ Verifier obtain access to non-editable/ locked self/joint-assessment data on AH platform along with documents the facility uploaded	VRP		✓	✓			✓	
9.	Verifier Body/ Verifier reviews self/joint-assessment to determine correct person-day requirements	VRP		✓	✓			✓	
10.	Verifier conducts off-site documents review, if applicable	VRP		✓				✓	
									<b>Week 1</b>
									<b>Typically, no earlier than week 3 Typically, no later than week 6</b> Note self/joint-assessment must be delivered to Verifier at least 10 working days prior to scheduled onsite visit. Some Verifier Bodies may need up to 4 weeks advanced notice to schedule a verification, as Verifier schedules are booked well in advance.
11.	Verifier reviews self/joint-assessment in detail to prepare for onsite verification, which includes facility background check	VRP		✓				✓	
12.	Verifier or Verifier Body provide pre-verification communication to facility, including document list and verification planning information according to Verification Protocol requirements	VRP		✓	✓				
13.	Verifier downloads Data Collection Tool from AH platform with non-editable/ locked self/joint-assessment data to have back-up during onsite verification in case AH platform connectivity issues occur	VRP		✓				✓	
14.	Verifier conducts onsite verification following Verification Protocol requirements, including opening meeting, document review, interviews, facility walk through, and closing meeting; facility cooperates with Verifier to provide access to site, documents, personnel	VRP	✓	✓					
									<b>Typically, no earlier than week 4</b>



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NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE <sup>1</sup>	
			F	V	VB	GW	AH	VOO		
15.	Verifier focuses on entering “Updated during Verification”, “Inaccurate”, “Legal Flag” items to inform Verification Summary for closing meeting; completion online or in downloaded excel offline; Verifier addresses any facility questions/ concerns during closing meeting	VRP		✓				✓		<b>Typically, no later than week 8</b> Note Verifier availability may require up to 4 weeks advanced notice and verification can be semi-announced with 10-day window
16.	Verifier or Verifier Body resolves any further facility concerns/ questions about verification latest 48 hours after onsite verification ends then proceeds with filling in the Data Collection Tool (recommend online)	VRP		✓	✓			✓		<b>Typically, no earlier than week 6</b> <b>Typically, no later than week 10</b>
17.	Verifier uploads offline verification to online AH platform and/or fills in verification online and follows Accredited Host automated checks/flags for proper completion	VRP		✓				✓		
18.	Verifier Body conducts quality check of Verifier's work and either Verifier or Verifier Body changes the assessment status to “Verification Completed” on AH	VRC		✓	✓			✓		
19.	Automated Data Quality checks are performed on the verified assessment data submitted by the Verifier	VRQ				✓		✓	✓	
20.	If VRQ fails, the Verifier reviews the failures on AH platform and makes necessary edits and -again- changes status to “Verification Completed on AH	VRE		✓				✓		<b>VRQ failures are almost immediately submitted to Verifier after Verifier completes verification (VRC); Verifier can choose to immediately review and make changes and submit again to VRC or after 4 calendar days status automatically changes from VRE to VRC with or without edits by Verifier</b>
21.	Facility reviews the verified assessment online or offline in excel through download from AH. The facility has 14 calendar days to review and request edits by the Verifier before facility’s manual finalization by changing status to VRF or AH’s automated finalization on calendar day 15.	VRC	✓					✓		
22.	Facility reaches out to Verifier Body/ Verifier directly (offline) with any concerns/ questions about the verification data. Once edits agreed between Verifier Body/ Verifier and facility, facility changes VRC to VRE to allow Verifier access to the assessment	VRC and maybe VRE	✓	✓	✓			✓		

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NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE <sup>1</sup>
			F	V	VB	GW	AH	VOO	
	for edits.								<b>Typically, no earlier than week 8</b> <b>Typically, no later than week 12</b>
23.	Verifier reviews facility concerns and edits the assessment as agreed. Verifier changes status to VRC so the facility can review the edits and request further changes as necessary. Status change from VRC to VRE to VRC can occur as often as necessary within the 14 calendar days. On calendar day 15 the process ends and the assessment changes to VRF, unless the facility manually changes to VRF before 14 calendar days are up.	VRE then VRC	✓	✓			✓		
24.	Facility changes assessment status to "Verification Finalized" by accepting the verification or opens a "Dispute" if there are complaints about Verifier following procedure or Verifier conduct. If facility takes no action, assessment status automatically changes to VRF after 14 calendar day review and edit period ends.	VRF or VRD	✓				✓		
25.	In VRF, facility can share the accepted verified assessment via the Gateway and/or the Accredited Host with other Users and other AH platforms	VRF	✓			✓	✓		
26.	If Dispute opened, VOO evaluates the validity of the Dispute and accesses the verified assessment data via the Gateway; facility can only open Dispute process once	VRD	✓			✓		✓	<b>Typically, no earlier than week 11</b> <b>Typically, no later than week 15</b> Note VOO evaluates validity of Dispute within 2 working days. If substantiated, VOO attempts to resolve Dispute within 10 days and gives 4 calendar day notice prior to change to VRI
27.	If Dispute substantiated, depending on the outcome, ○ VOO invalidates verified assessment (VOO notifies facility and 4 calendar days later changes to VRI) OR ○ VOO returns assessment to Verifier for edits and final facility review (Verifier and facility have 5 calendar days to make edits and review)	VRI or VRE and VRC	✓	✓	✓	✓	✓	✓	
28.	If Dispute not substantiated, VOO finalizes verified assessment and changes status to "Verification Finalized" after 4 calendar day notice to facility; see point 25 for next steps.	VRF				✓		✓	
29.	Note that in VRF, the VOO can choose to conduct quality assurance procedures for any verified assessment; outcome of	VRI				✓		✓	<b>Typically, no earlier than week 16</b> <b>Typically, no later than week 22</b>

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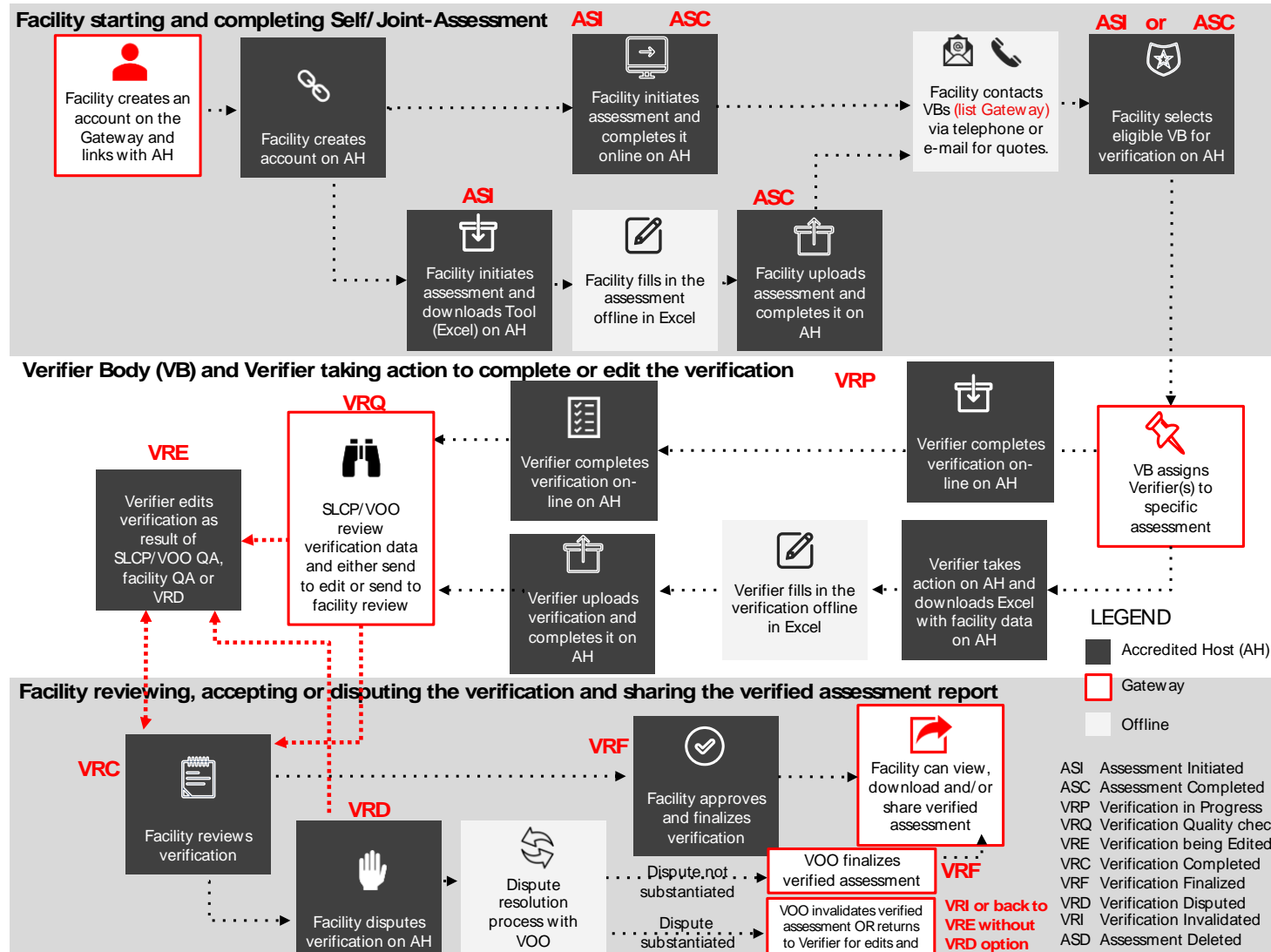
## SOCIAL & LABOR CONVERGENCE

NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE <sub>1</sub>
			F	V	VB	GW	AH	VOO	
	this verification oversight activity may result in invalidation of a verified assessment								Note duplicate verifications (most time intensive QA procedure) can take 8-10 weeks after VRF to complete

Converged Assessment.  
 Collaborative Action.  
 Improved Working Conditions.

# SOCIAL & LABOR CONVERGENCE

The following image also shows a summary of the SLCP assessment actions:



## Pre-Onsite Verification Actions

Any mandatory requirement applicable to the Verifier Body or Verifier will be highlighted through use of this icon:



### 1. Account creation on Gateway

Follow instructions on the [Gateway](#) to create your account as a facility or as approved Verifier Body and approved Verifier.

### 2. Facility discusses verification cost/timeline offline with VBs

A list that includes all SLCP approved Verifier Bodies is available on the [Gateway](#). However, not all Verifier Bodies will be eligible to conduct a verification in a specific facility. A list of Verifier Bodies available for the specific verification becomes visible on an Accredited Host platform once the facility requests a verification. Eligibility is based on whether the Verifier Body is operating in the country in which the verification will take place and which languages the Verifier Body can support through its Verifiers.

Prior to Verifier Body selection, the facility should have offline conversations with Verifier Bodies regarding quotes and services. If COVID-19 is a concern, the Verifier Body should communicate below Annex III to facilities to educate them on how to incorporate specific information into the self/joint-assessment and how the Verifier is going to address COVID-19 in the verified assessment report. Once agreement is reached (offline) between the facility and the Verifier Body, the facility selects that Verifier Body on the Accredited Host platform.

SLCP recommends having these offline conversations even prior to self/joint-assessment completion, as timelines are short.



Verification must happen within 2 months of completion of the self/joint-assessment. The date the Verifier must reference to determine completion of the self/joint-assessment is in the Data Collection Tool, Facility Profile section, Row 30 far right column UVW (offline Excel location) question FP\_BI-22: *Date of self/ or joint-assessment submission (DD/MM/YYYY)*. Should the facility/Verifier Body miss this timeframe for verification, the facility must contact SLCP through the [Helpdesk](#) to change the status of the assessment back to ASI-Assessment Initiated so the facility can update the self/joint-assessment.


SLCP also recommends scheduling the verification at a time where at least 80% of the workforce is active, i.e. to avoid scheduling the verification during very low volume or holiday seasons.





During the scheduling process, the VB must discuss with the facility any changes in their workforce due to COVID-19. If the facility has experienced a change of 50% or more of their workforce since the date of completion of their self-assessment, the Verifier Body must advise the facility to review and update the self-assessment. Note that if the workforce has changed considerably, there may be multiple questions that need to be updated by the facility, not just worker demographic information.


The facility can ask potential Verifier Bodies (available on the [Gateway](#)) if they operate in the country of verification and if their Verifiers speak the language(s) of the employees and also provide the estimated date of completion of self/joint-assessment so Verifier Bodies can evaluate scheduling. SLCP is committed to the principle of being able to communicate with any person at the facility. This can be challenging at sites with multiple languages. See Action No. 14. for more information.

Prior to Verifier Body selection, the Verifier Body does not have access to the self/joint-assessment data. When providing quotes to the facility, the Verifier Body will request facility data, such as, location, number of employees and languages spoken to estimate the onsite verification duration. The verification duration can only be *estimated* until the Verifier Body has access to the self/joint-assessment data and can properly assess verification requirements.

 Further, in relation to COVID-19 and the amount of onsite time required: onsite time is based on the facility's current workforce (workforce at the time of onsite verification). Changes to the workforce due to COVID-19 may impact the amount of time Verifier Bodies spend on site. During scheduling (and also when onsite if prior information was not available see Action No 14. onwards), the Verifier Body must confirm if any major changes to the workforce are permanent changes (e.g. terminations) or temporary changes (e.g. furloughs). If the changes are temporary, then these furloughed employees must also be considered when determining the amount of onsite time.


 Verification can be announced or semi-announced with a 10-day window. The facility determines the type of announcement. Should the facility wish to have an unannounced verification, this is also possible, but SLCP does not require the verification to be unannounced. In planning, the Verifier Body must consider local/national holidays as well as any specific dates or date ranges that the facility will be unavailable for verification.

 The verification must take place over consecutive days.

 The facility and the Verifier Body must have a documented agreement with a specified date or date range for onsite verification.

### ***3.-5. Facility account creation on AH platform, initiating self/joint-assessment, completing self/joint-assessment***

Modules 3 and 7 of the SLCP e-learning explain these actions in detail. Facilities can also access the [Helpdesk FAQs](#) to obtain more information. Once the facility initiates the self/joint-assessment on the Accredited Host site, the assessment status is "Assessment Initiated". Once the facility completes the self/joint-assessment on the Accredited Host site, the assessment status changes to "Assessment Completed".

 Note for newly operational facilities: At minimum, the facility must include 3 months of operation in the self or joint-assessment, because the Verifier needs to review 3 sets of records during verification. However, before completing the self/joint-assessment, SLCP recommends the facility discusses the SLCP assessment process with their customers to see if customers would prefer more months in operation prior to receiving a verified assessment report.

If a facility has difficulties understanding or completing the self-assessment, they can seek external assistance and thus complete a joint-assessment. Examples of entities that can provide external assistance are SLCP approved Verifier Bodies, SLCP signatories like brands, agents, civil society organizations or other social responsibility consultancies.

On the Accredited Host platform, the facility can upload documents or photos to provide more information for every question. All uploads will be attached to the final verified assessment. Should the facility choose to share the assessment with a business partner, the final verified assessment along with any attached documents/photos will be shared.

SLCP cannot police the type of documentation that the facility uploads. However, SLCP strongly recommends not to upload records that can violate an individual's privacy or data protection. Examples of appropriate documents to upload are policies, procedures, handbooks, training content, (risk) assessments, and organization's certificates/ certifications.

## **6. Facility selects VB on AH platform**

Modules 3 and 7 of the SLCP e-learning explain these actions in detail. Facilities can also access the [Helpdesk FAQs](#) to obtain more information.

In either "Assessment Initiated" or "Assessment Completed" status, the facility can select a VB on the Accredited Host platform.

Please refer to Annex II for more information on how Verifier Bodies are designated eligible for a specific facility.

If there are no Verifier Bodies for selection on the AH platform, the facility must contact the [Helpdesk](#).

## **7. VB assigns Verifier on Gateway**

To ensure data integrity and prevent bias, the facility cannot choose the SLCP approved Verifier. Rather, the Verifier Body assigns the SLCP approved Verifier to a verification. They do this on the Gateway where a list of SLCP approved Verifiers is available for selection.



The Gateway already provides some filtering to ensure some rules are enforced for Verifier selection, but it is still the Verifier Body's responsibility to ensure all rules for Verifier selection are enforced.



The Verifier Body must follow verification person-day minimum requirements (see Action No. 9. below) and must assign more than one Verifier accordingly.



Verifiers will only be eligible for a specific verification if:

- They did not verify the facility's previous assessment (this rule applies even if a facility has moved locations);
- Their Verifier Body was not involved in the joint-assessment that is now undergoing verification.

All Verifiers are encouraged to meet the following requirements to be eligible for a specific verification:

- Gender is appropriate for the facility circumstances;
- Gender is different from the previous assessment, if such switch in gender will facilitate gathering of different perspectives during the present verification.



At least one Verifier must meet the following requirements to be eligible for a specific verification:

- Eligible to verify in the country of verification according to VOO qualification;
- Speaks at least one of the employee languages;

Any additional Verifiers are encouraged to meet the following requirements to be eligible for a specific verification:

- Eligible to verify in the country of verification according to VOO qualification;
- Speaks at least one of the employee languages;



If the Verifier Body cannot follow the requirements, it must contact the VOO via [slcp@sumerra.com](mailto:slcp@sumerra.com).


Verifier Bodies can also access the [Helpdesk FAQs](#) to obtain more instructions on how to use the Gateway.

Please refer to Annex II for more information on how Verifier Bodies and Verifiers are designated eligible for a specific facility.

Once the Verifier takes action related to the assigned verification on the Accredited Host platform, the assessment status changes from “Assessment Completed” to “Verification in Progress”.

### **8. VB/ Verifier obtain access to self/joint-assessment on AH along with any uploaded documents**

The Accredited Host platform is configured to ensure the self/joint-assessment is completed according to SLCP minimum requirements to proceed to the next step of verification.


 The self/joint-assessment must be accessible to the Verifier at least 10 working days prior to the scheduled onsite visit. Failure by the facility to submit the assessment on time will be considered grounds for re-scheduling the onsite visit date or date range.


E-learning module 7 presents each Accredited Host platform. Verifier Bodies/ Verifiers can also access the [Helpdesk FAQs](#) to obtain more information.

### **9. VB/ Verifier reviews self/joint-assessment to determine correct person-day requirements**


It is likely that the Verifier Body has already provided the facility with a cost and person-day estimate for the verification. However, the Verifier Body can only accurately determine how many person-days are needed and if an off-site document review is possible once they have access to the self/ joint-assessment.

- Only facilities may request an off-site documents review, they must not be required by Verifier Bodies. Based on the documentation submitted, the Verifier Body determines if off-site Verification is possible. The Verifier Body/ Verifier can also determine if onsite person-days can be reduced if a documentation review is conducted prior to onsite verification.
- The data now shows how much of the self/joint-assessment has been completed, in particular if step 2 (Management Systems) and step 3 (Above & Beyond) are included. Depending on how much data there is to verify, the Verifier Body/ Verifier may change the person-day estimates. For example, facilities with fewer policies in place with regards to the management system questions will require less time to review policies.
- Ensure the steps (1 or 1+2 or 1+2+3) the facility has included in the self/joint-assessment match the verification scope negotiated between the Verifier Body and the facility.
- Ensure the self/joint-assessment contains at minimum 3 months of operation/ 3 months of self-assessed data.


 If an off-site documents review is requested and deemed feasible/ appropriate by the Verifier Body/ Verifier, the onsite person-days can be reduced by maximum one person-day.

 The number of calendar days for onsite verification must not exceed 4 consecutive working days unless the facility provides express documented permission to exceed the 4 calendar day requirement. If the number of calendar days exceeds 4 consecutive working days, the Verifier Body must send more than one Verifier.



 A person-day means one Verifier present for one 8 hour working day onsite for verification. Trainees, assistants or other individuals who are not SLCP approved Verifiers cannot count toward the person-day requirement. A half person-day means one SLCP approved Verifier present for 4 hours during a calendar day onsite for verification.

The below table shows information that informs person-day, interview and documentation review requirements.

 Step 1 person-day listing is a minimum requirement and must be followed. Person-day requirements for step 1 may only be decreased if off-site documents review is applicable. If the facility chooses more than step 1 (i.e. 1+2 or 1+2+3), person-day requirements must be at least half a person-day more than the indicated step 1 minimum. For example, if the facility has 1-100 employees, step 1 minimum is 2 person-days, step 1+2 minimum is 2.5 person-days, step 1+2+3 minimum is also 2.5 person-days.

Step 1+2 and 1+2+3 person-day listings are suggested timeframes, but the minimum addition to the step 1 timeframe is half a person-day. As the scope of verification can drastically differ from one facility to another in the sections of Management Systems and Above and Beyond, SLCP cannot require Verifiers to adhere to the suggested person-day information listed in these two columns. Rather, the information is a suggested duration of verification and the Verifier can determine the necessary additional person-day requirements depending on self/joint-assessment data. It is recommended that Verifier Bodies add additional onsite time if any of the following conditionals apply: facilities have migrant workers and/ or multiple languages spoken; facilities have specialized operations with additional health and safety hazards, such as vehicle fleets, water reservoirs or large quantities of hazardous materials; facilities have large compounds or more than one location associated with the business license.

Number of Workers <sup>o</sup>	Individual Interviews*	Number of Group Interviews*	Personnel Files	Wage & Hour Records	Person-Days (Step 1)	Minimum requirement	
						Person-Days (Step 1+2)	Person-Days (Step 1+2+3)
1 - 100	10	1	16-18 <sup>^</sup>	16-18 x set of 3 = 48-54 <sup>^</sup>	2	3	4
101-200	12	2	24-28 <sup>^</sup>	24-28 x set of 3 = 72-84 <sup>^</sup>	2	3	4
201 - 500	15	2	27-31 <sup>^</sup>	27-31 x set of 3 = 81-93 <sup>^</sup>	3	4	5**
501 - 1000	20	2	32-36 <sup>^</sup>	32-36 x set of 3 = 96-108 <sup>^</sup>	3	4	5**
1001+	26	3	44-50 <sup>^</sup>	44-50 x set of 3 = 132-150 <sup>^</sup>	4	5**	6**

Any step in addition to step 1 requires minimum 0.5 person-day more time than the "Minimum requirement". Below are just suggested total person days.

<sup>o</sup>Workers in this context means the workers who are within scope of the SLCP assessment. These are "Production Employees" (employees working on/with the facility's product or directly involved in the operations of the facility). They are non-supervisory. Which means, no one reports to them.

\* Time estimate: 15 minutes per individual interview, 30 minutes per group of 6-8. Group interviews are in addition to individual interviews. E.g. 1-100 workers total 16-18 employees must be interviewed.

<sup>^</sup> Range applicable, as group interviews are one group = 6-8 workers.

\*\* VBs must send at least two Verifiers onsite to limit the calendar days onsite (unless facility provides express permission to exceed the 4 calendar day requirement). Note, not all Verifiers need to be present every single day of the onsite verification, however details about who was present on which day must be noted in the Verification Details section of the report.

Exceptions to the person day-requirements or other requirements in the Verification Protocol may be made by the VOO. Exceptions can be requested by completing an [Exception Request form](#).

### 10. Verifier conducts off-site documents review, if applicable



An off-site Verification is only conducted if appropriate and sufficient documentation is provided.

- Appropriate documentation means the documents provide evidence or further context related to the question.
- Sufficient documentation means that the Verifier can fully or partially verify the self/joint-assessment answer to the question by documentation review only. More information through Verifier observation or interviews onsite may be necessary to fully verify the answers.

If the documentation is neither appropriate nor sufficient, off-site review can be declined by the Verifier, as the Verifier cannot execute proper off-site verification. The Verifier must explain in detail why off-site review is not possible.



If an off-site documents review is conducted, this must be completed prior to the onsite verification.

### **11. Verifier reviews self/joint-assessment in detail to prepare for onsite verification, including facility background check**



To prepare for the onsite verification, the Verifier must study the self/joint-assessment completed by the facility. This will also help with creation of the facility-specific verification plan (see Action No. 12.). The Verifier will gain an understanding of the facility's management systems, including management personnel onsite, scope of documentation and physical premises of the facility, as well as potential risk areas, such as presence of migrant labor, dormitories and hazardous operations.



Verifier Body and Verifier must also obtain relevant social and labor information related to specific conditions within the country and region of SLCP verifications, ensuring they have up-to-date knowledge. Verifiers must be knowledgeable on employment laws such as minimum wage, working hours and social benefits that pertain to the facility location, and on fundamental International Labour Organization (ILO) conventions that have not been ratified or are not being adhered to.

Furthermore, a background check of the facility must be conducted and include, at a minimum:

- Web-based research on facility and its local area for any social and labor issues or labor unrest that may have occurred in the last two years (potential sources of information are trade unions, regulatory bodies, community members, non-governmental organizations and government websites that provide information on present or past legal action);
- Employee demographics, especially the presence of migrant workers and young workers as well as any possible language challenges;
- The type of laws that apply to this particular facility.

The Verifier may also request previous social audit reports or the previous SLCP verified assessment report to obtain facility-specific information. The facility is not obligated to share this information with Verifiers. Also, the Verifier should be aware of potential bias that can develop with review of previous reports.

Further resources provided by the ILO are: [Industrial Relations Database](#) and [Working Conditions Laws Database](#).

### **12. Pre-verification communication to facility (document list, verification planning information et al.)**



After a verification is scheduled, the Verifier/VB must communicate the following information to the facility no later than ten working days prior to the date of the verification:

1. The number of person-days and calendar days required to complete the verification
2. Reminder of how the facility must include information on COVID-19 in the self/joint-assessment (use Annex III)
3. Document list (customized based on country of verification, but a basic document list is provided under Annex V)
4. The expectation that onsite verification requires access to all areas of the facility and its grounds, photographs (respecting and avoiding proprietary information) and confidential interviews between the Verifier and employees and management
5. A statement on the need for senior management and employees' representatives to be present at the opening and closing meeting
6. Contact details for Verifiers/ VB in case facility needs a local contact (telephone number and email)
7. An explanation that only under exceptional circumstances (e.g., non-access to documentation or information due to absence of key management personnel on the days of the verification assessment), the facility may provide additional information after the onsite verification. Normal

Protocol requires the facility to have all information ready during onsite verification. Delay of closing the verification process can last only up to 2 working days, i.e., the facility can only provide additional information up to 2 working days after the onsite verification. This gives the Verifier 8 working days to complete the verified assessment report. Additional fees may apply depending on the scope of work to be completed post verification.

8. This link for more information about SLCP and its process <https://slconvergence.org/helpdesk>
9. The [SLCP Code of Conduct \(see Annex V\)](#).
10. This link for the SLCP QA Manual, which explains the Dispute Process and how reports may be invalidated <https://slcp.zendesk.com/hc/en-us/articles/360014823394-Quality-Assurance-Manual>

SLCP has created a template (see Annex IV) that can be used to communicate the above.



Closer to the scheduled verification, but no less than five working days prior, the Verifier/ Verifier Body must send a verification plan outlining in more detail the daily activities of the verification, including, at minimum:

1. The calendar days onsite (or number if verification is semi-announced)
2. The hours of verification (start and finish for each day)
3. The expectations for the opening meeting, including who should be in attendance (Verifier can infer information about management, workers, workers' representatives/ union representatives from the self/joint-assessment)
4. The minimum number of interviews that have to be conducted
5. The minimum number of wage/hour/personnel records that have to be reviewed
6. The document request list either as a repeat, or slightly modified if off-site documents review occurred or Verifier already has access to documents through the self/joint-assessment.



Should COVID-19 be a concern, the Verifier Body should check in with the facility to ensure there have been no significant changes to the workforce or operations since the completion of the self/joint-assessment. See requirements around scheduling in Action No. 2. In addition, closer to the verification, Verifier Bodies should ensure that the processes the facility self-reported on will be in operation during the verification (e.g. if certain parts of what the facility does are not operational, the verification should not take place).

Prior to travelling to the verification site, Verifier Bodies should check for any health and safety or travel restrictions put in place by local governments. Additionally, Verifier Bodies and Verifiers should abide by any health and safety policies factories implement or any applicable laws/ regulations in place, whichever stricter, to protect workers and visitors (e.g. wearing a mask, temperature checks). Verifiers are expected to practice good hygiene and to respect social distancing when conducting verifications.

### **13. Verifier downloads Data Collection Tool from AH platform for back-up during onsite verification**

If not already done to complete Action No. 11., SLCP recommends downloading the offline excel Tool for verification in case the Verifier experiences Internet connectivity issues during the onsite verification.

## Onsite Verification Actions

### **14. Verifier conducts onsite verification (opening meeting, walk through, interviews, document review, closing meeting)**

#### What to verify?

A facility can decide to collect data on:

- Basic social and labor compliance topics (step 1),
- Basic social and labor compliance topics and facility management systems (steps 1+2), or
- Basic social and labor compliance topics, facility management systems and practices around workplace well-being and community impact (steps 1+2+3)



The SLCP approved Verifier must verify all data (according to steps chosen in the self/joint-assessment):

- Recruitment and Hiring (step 1)
- Working Hours (step 1)
- Wages and Benefits (step 1)
- Employee Treatment (step 1)
- Employee Involvement (step 1)
- Health and Safety (step 1)
- Termination (step 1)
- Management Systems (step 2)
- Above and Beyond (step 3)

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 verify what the correct answer is. Some Verifier selections in the Tool can open up questions that the facility did not see during the self/joint-assessment and therefore did not answer. The Verifier must provide the correct answer to these unanswered questions. See [Verifier Guidance](#) for examples.

#### What is the verification scope?



**TIMEFRAME:** The timeframe of the initial self/joint-assessment is based on the previous 12 months from the date that the Tool is completed. The timeframe of the verification process is also based on the same previous 12 months from the date that the Tool is completed. This is referred to as the assessment period. The only exception to this is when filling in the Facility Profile. When the Verifier arrives onsite the Facility Profile circumstances may be different from what they were during the self/joint-assessment. For all other questions, the assessment period 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/ current as of the onsite verification date information which may require an update and selection of “Updated during Verification”. These changes are not considered “Inaccuracies” but rather updates to the provided facility data.

Note, should the difference between the Facility Profile self/joint-assessment and actual circumstances during verification affect the person-day and/or other requirements, the Verifier must follow all Verification Protocol requirements applicable to the current facility circumstances.



**PHYSICAL SCOPE:** Each verification must cover the area as defined by the facility in the Facility Profile of the self/joint-assessment and all operations included therein. The physical scope reported, is usually tied to the facility’s business license and operations permitted therein. Should the actual physical scope greatly differ from the self-assessed/ facility-reported physical scope and the Verifier decides the scheduled verification timeframe is not enough to complete a verification of the actual physical scope, the Verifier may extend the verification person-days or reschedule the verification.

**!** **WORKER SCOPE:** The term "Employees" is used throughout the Tool. It refers to a facility's "Production Employees". In other words, the facility's workers. "Production Employee" refers to those employees working on/with the facility's product or directly involved in the operations of the facility. They are non-supervisory which means that no one reports to them. As facilities might not only be involved in production of goods, but also general operations activities, e.g. distribution, the term "production" should not be seen as limited to production of goods only, but rather general operations of the facility. Examples of "Production Employees" are cutters, sewers, QC, packers, etc. (all workers who contribute to produce the product), boiler workers, mechanics (machine repair persons), and workers who load product onto trucks.

Verifiers must include all applicable types of "Production Employees" in the onsite verification:

- New hire, under probation, under age 18, union/ worker representative, pregnant, returning from maternity leave, foreign migrants, domestic migrants, other vulnerable groups or minorities
- Part-time, fixed term, short-term (a person with a labor contract of limited or unspecified duration with no guarantee of continuation), temporary (e.g. labor supplied by a third-party employment agency)

In the event that Verifiers suspect potential issues among employees in the facility, Verifiers should also check third-party service providers not directly working on the product and therefore not included in the worker scope for the purposes of SLCP. These workers may shed more light on the situation. Examples of such workers are those working in food service, security, childcare, and custodial.

#### How to verify?

**!** The general principle of "triangulation" applies to verification activity as it applies to traditional social auditing. Verifiers must cross-check information gained from observation and documentation review with information gathered from the interview process with both management and employees to understand how workers are affected by various situations.

**!** Any verification activity, including the Verifier obtaining access to employee files and data for review and retention of such data/ information, must be in compliance with any applicable data privacy laws and regulations.

#### What is the verification process?

**!** **OPENING MEETING:** The onsite verification must start with an opening meeting, including, to the extent possible, facility management, workers' representatives and those individuals responsible for managing recruitment, contracts, wages, and health and safety to discuss verification objectives, scope, and methodology.

- !**
- Verifiers must encourage the facility to be open and transparent during the SLCP process. Data integrity is key to the success of SLCP. Data collection and verification should reflect actual labor conditions.
  - Authorization to take pictures must be requested. The Verifier will observe facility restrictions and not photograph sensitive (i.e., proprietary) products, materials or processes. If photo authorization is completely denied, the Verifier will note the denial in the verified assessment report. Should the facility refuse the Verifier's request to take photos and yet agree to take photos themselves on behalf of the Verifier, this must be noted in the report along with any incidences where the Verifier did not receive pictures they requested.
  - Verifier must inform management that the Verifier selects the employees to interview, and that the employee interviews are confidential, and that the employer is prohibited from taking retaliatory action against those who are interviewed.
  - If applicable, Verifiers must inform management that they wish to interview the head of the union(s)/ worker organization(s), and request that each union put forward a group of worker level union

members/ representatives.

- If the facility management does not agree to the participation of workers and/or their representatives in interviews, the Verifier must cancel the verification as information cannot be verified.

Opening meeting agenda recommendations:

- Introduction of the verification team and facility management personnel.
- Reviewing the scope and activities of verification.
- Reviewing a facility floor plan to ensure that all appropriate areas are part of the walk-through activity. Facility should advise whether Verifiers need PPE or a safety orientation to mitigate any health and safety risks.
- 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 or circumstances of not following legal requirements.
- Data, including potentially confidential data, will be gathered during the verification. Data that can be linked back to a specific individual/ employee 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.



Throughout the verification, the Verifier informs facility management about any inaccuracies, notable verification data entries and any legal flags. This will help the Verifier in conducting the closing meeting at the end of the verification, as any gaps or updates to the original facility response will not come as a surprise. In addition, the facility will likely have less questions and concerns about the Verifier Tool entries, as they will have already had the opportunity to discuss the items with the Verifier during the verification.



**WALKTHROUGH/ ONSITE OBSERVATION:** The purpose of the walkthrough is to visually verify the implementation of policies and procedures and observe workplace health and safety practices. The Verifier must take time to first look at the 'big picture' before homing in on the detail.

Recommended items to look out for to understand the 'big picture':

- People being ushered out of the workplace (e.g. children, or those without contracts)
- People being moved within the workplace (e.g. young people doing hazardous work or pregnant women working with chemicals being moved)
- Things being hastily hidden (chemicals in the general work area) or doors being quickly locked or unlocked
- PPE being hastily put on
- General demeanor of workers (are they willing to look up or do they avoid eye contact, are they allowed to talk to each other, go to the toilet when they wish)


Refer to Annex VII for tips concerning the walkthrough.




**WORKER INTERVIEW** sample size is based on Action No. 9. Verifier must meet or exceed the minimum number of interviews. Verifier decides, based on real-time information at the facility, how to compose or expand the sample to achieve the best quality possible. The Verifier and not the facility selects the employees to interview. The Verifier may increase the number of interviewees as long as they are able to provide clear justification in the Verification Details section of the Tool as to why they did so.





The Verifier must interview a representative sample of employees. This means, the Verifier must consider both the types of contracts and types of people in the workforce.

 The Verifier must interview the trade union and/or worker representative, where they exist, to explore their view of working conditions, management attitude as well as any specific issues. If the union is independent of the employer, this interview can be an important source of leads on other issues in the facility. If there are union/ worker representatives serving in committees, they must also be included in the interviews.

SLCP recommends that the Verifier speak with a worker representative – elected or not (this person could be a trade union representative or elected through an internal system or appointed by the facility) – or equivalent at the start of the Verification Process and also at the end of the process prior to the closing meeting. Where a Verifier suspects the union chairperson is influenced by management, they should also interview the other members of the trade union committee to determine the extent of management interference in the union, including through tactics such as threats, transfers, or bribes. Verifiers should be very clear that the group meeting should not involve management/ office staff even if they are union members/ representatives.


 Worker interviews are strictly confidential and subsequent reports will not identify the names of interviewees nor their individual responses. Verifiers must ensure that problems raised by employees are discussed with management in a non-attributed way. Verifiers must never provide specific names, identification numbers or other obvious indicators (e.g., if there is only one worker in a specific section and that section is cited in the report) of facility workers to facility management or within the assessment report. Verifiers may keep a confidential record of those with whom they have had interviews according to Verifier Body policy.


 Interviews must take place away from management and supervisors in a room or space where interviewees feel comfortable sharing sensitive information.

 Interviews must take place in a language understood by workers. This may involve the use of translators. SLCP is committed to the principle of being able to communicate with any person at the facility. This can be challenging at sites with multiple languages. Information about languages is in the Facility Profile, but for scheduling purposes, the Verifier Body will have to inquire about the languages prior to receiving the self/joint-assessment. The Tool asks for primary, secondary and third most prevalent language spoken by production employees, as well as the primary language spoken by facility management. The verification team must be able to support at least the top two languages spoken by employees and the primary language spoken by management. Verifiers who are fluent in a language but cannot read/write are considered as being able to support a language. However, the Verifier Body must take care in selecting the Verifier(s) to ensure they can read the facility's policies, procedures and other documentation relevant to completing the verification.

The facility has the right to insist on following a higher standard and requiring more language capability.

If the Verifier(s) cannot support the language requirements, the Verifier Body may use professional translation services. Translators must be present on site. It is required to use translators who are trained to understand social compliance topics to allow for a thorough, accurate and trusted communication.

 Translators must be independent of the facility and any labor agents present at the facility. Finding and contracting a translator is the responsibility of the Verifier Body. In cases where interpreter cost or lack of qualified interpreters is an issue, the Verifier may appeal to the VOO for permission to provide less language capability for the verification.

 If a translator is present during the onsite verification, the Verifier must provide information on the translator in the Verification Details section of the verified assessment report.



Refer to Annex VII for tips concerning worker interviews.

**!** **MANAGEMENT INTERVIEW:** To support understanding of management systems and documents, Verifiers must engage in management interviews with applicable facility personnel, including, at minimum, personnel working in Human Resources, Industrial Relations, and Health & Safety. Verifiers must conduct management interviews to verify all Tool steps (1+2+3). Especially questions related to step 2 Management Systems and step 3 Above and Beyond will require extensive engagement with management personnel, specifically those who engage in the aspects of Plan, Do Check, Act "PDCA" around management systems and those engaged in the management of employee well-being and community projects.

Refer to Annex VII for tips concerning management interviews.

**!** **DOCUMENTATION REVIEW:** Verifiers must review documents to understand the infrastructure of the facility's management system and to verify specific claims about how the workforce is managed. The data collected during interviews must be checked against documentation to ensure that all reports are congruent with each other. The individuals interviewed will form part, but not necessarily all, of the sample of persons whose files and payroll are verified. Sample size is based on Action No. 9. The Verifier may decide onsite to concentrate a review of personnel files or payroll on a set of employees or on those persons with the highest/lowest hours or wages per pay period. That decision is at the discretion of the Verifier. The personnel files will be reviewed to verify facts about contracts, age and identity proof, training, job performance, disciplinary action and resignation/ termination.

**!** **WAGE AND HOUR RECORDS:** The process for reviewing wages and hours involves selecting three pay periods from the 12-month assessment period to verify the self/joint-assessment data. The specific months will represent the most recent pay period, one month of high production and one month of low production. If there are no clear high and low production months, then the selection must be random. The Verifier may extend the sample within the 12-month assessment period if s/he deems it necessary to substantiate the verification.

**!** If the facility experienced any closures, e.g. due to COVID-19, the Verifier must include this time period in the record review to confirm that wages and benefits were paid in line with legal requirements. This means more than 3 sets of records may need to be reviewed (high, low, recent, closure).

**!** **ATTACHING PHOTOS/ DOCUMENTS:** At minimum, Verifiers must include photographic evidence and/or documentation attached to the applicable question of the Tool in the following instances:

- Outside general overview of the building and area surrounding the facility
- Inside general overview – main section(s) of the interior, the “shop floor”
- Attendance recording system
- Work in progress: e.g. assembly, cutting, packing
- Canteen, kitchen and/or dormitory (if present)
- Waste handling and storage areas
- Hazardous substance storage areas
- Personal protective equipment
- Firefighting equipment
- Emergency exits and marked non-exits
- Bulk storage tanks and secondary containment
- Supporting facilities such as wastewater treatment and boiler
- Abatement equipment (items used to reduce intensity of pollution)
- Good practices

- Issues identified as "Inaccurate" or "Legal Flags"
- Issues where more information would help the reader understand the facility circumstances, no matter the outcome of the "Corrected Response"

Examples of instances for attachments are noted in the Verifier Guidance.

Photographs must only be taken with the permission of the facility as they may contain confidential information, and all attachments should be free of personal/ private data. For example, if Verifiers want to demonstrate a wage issue, they may use a sample to highlight the issue and must black out any personal information.

Attachment of photos/ documentation is only possible through the online Accredited Host platform. Verifiers can attach a file at question level and thus select the most applicable question that relates to the attachment. Verifiers can also attach a file containing information of a more general nature or information that does not fit a specific question to the last question in the Verification Details section of the Tool: *Are there any photos you would like to add to the verification that did not directly correspond to a question?*

If multiple photos are shared in one file/ attachment, SLCP recommends using a word processing software (e.g. Microsoft Word or equivalent) or a presentation software (e.g. Microsoft PowerPoint or equivalent) to capture the multiple photos and write a detailed description for each photo.



**SITUATIONS OF DENIED ACCESS:** Should the Verifier experience any issues with viewing/ accessing information required to verify the self-assessed data:

- Remind the facility of the CAF Terms of Use, which they agreed to 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.*
- Remind the facility of the purpose of SLCP (data collection and data sharing) and that it is in the facility's interest to have the most complete set of verified data for sharing.
- Remind them that if the Verifier cannot verify the data, the Verification Selection will be "Inaccurate", affecting the Accuracy Index of the report.

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

If denial of access is due to confidentiality, the Verifier must check the applicable confidentiality clause in place, include details about confidentiality in the Verification Data and also in the Verification Details section of the report.

In either circumstance, the Verifier must also include information on the facility's general behavior toward the assessment.


### **15. Verifier focuses on Verification Summary; addresses facility questions/ concerns during closing meeting**





**PRE-CLOSING MEETING:** If the Verifier has not already completed all "Inaccurate", "Legal Flag" and "Updated during Verification" items to create the Verification Summary in the Tool, the Verifier must now take the time to complete as much as possible, and ideally all fields that will allow the Verifier to have a productive closing meeting with the help of the Verification Summary. Note, the "Updated during Verification" items do not appear in the Verification Summary, only in the Facility Profile filled in by the Verifier. But it is important to review these with the facility to ensure they are aware of the updated information.


Depending on the scope/ breadth of inaccuracies and legal flags, the Verifier may not have enough time to complete all fields that are shown in the Verification Summary onsite and may have to skip some entries in the Verification Summary or just provide highlights to the facility. More information about how to complete the

Verification Summary in the Tool is in the Verifier Guidance.

 The Verifier must also have a final conversation with the union representative and/or worker representative interviewed at the beginning of the interview process, as applicable. This will help the Verifier gather any further information related to differences between the original self/joint-assessment data and the verified data.


 **CLOSING MEETING:** The onsite verification must end with a closing meeting, ideally including the same individuals who were present during the opening meeting, but at minimum facility management and union/worker representatives, if applicable. During the meeting, the Verifier reviews the scope of the work performed and highlights any discrepancies (gaps) between the self/joint-assessment and the verification outcomes so that a facility can understand how to better complete the Data Collection Tool in the following cycle.

 It is out of scope and not the Verifier's role to train management, nor to help the facility identify the root causes of issues found. The Verifier is to explain the factual gaps between the assessment data and the verified data and review any instances (not already noted in the self/joint-assessment) where the facility is not following local legal requirements.

 If the Verifier Body has an agreement with a user of the facility's verified assessment report - other than the facility itself - and this agreement involves reporting of verified assessment data, the facility must be made aware of such reporting. For example, SLCP does not prohibit Verifier Bodies from sending zero tolerance/ critical issue reports immediately after the onsite verification; but since these reports (which are outside of the SLCP system) include facility data obtained through the SLCP assessment process and the facility owns their data, the Verifier or Verifier Body must inform the facility of this special data sharing process. The information on data sharing by the Verifier Body can be shared with the facility during the scheduling process, but must be shared with the facility during the closing meeting.

Closing meeting agenda recommendations:

- Thanking 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 it will focus on "Inaccurate" and "Legal Flag" items.
- 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 on site
- 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 as per Action No. 12.); 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
- Dispute process
- If applicable, Verifier Body/ Verifier sharing of facility verified assessment data with users other than the facility

 Should the facility have any queries and/or concerns about the verified data at a question level, the Verifier and facility must discuss and attempt to address the issues during the closing meeting.

If not able to address the issues during the closing meeting, the Verifier Body/ Verifier and facility must attempt to solve the issues within the two working days after closing of onsite verification. If the issues still cannot be resolved, the facility still has time to connect with the Verifier Body/ Verifier during the facility review process of the report (14 calendar days from receipt of verified assessment report). If concerns relate to Verifier following Verification Protocol and/or Verifier conduct, then the facility can raise a Dispute. See further information under Action No. 24.

**16.-20. Resolving facility concerns, filling in Tool, completing report online to run AH checks, VB quality check, VRQ check with VRE edits, changing assessment status to VRC**

Within two days of end of onsite verification:

- Verifier/ Verifier Body may have to address facility concerns about the verified data. If they relate to question level issues like disagreement about a legal flag, then the Verifier/ Verifier Body must handle this offline between them and the facility. If they relate to Verification Protocol or Verifier conduct, then the Verifier/ Verifier Body must refer the facility to the Dispute process.
- Verifier may have to review further documentation or conduct remote interviews due to the exceptional circumstances during onsite verification. See Action No. 12.



**REPORT WRITING:** The Verifier/ Verifier Body has 10 working days after end of onsite verification to complete the verified assessment report. Filling in the Tool to complete the report can occur online or offline, but the process must end online as the Accredited Host runs checks to ensure proper completion of the Tool. These checks focus on content being entered for mandatory fields or in a specific type of format. These checks do not include the level of quality of data, which is the responsibility of the Verifier and the Verifier Body when it runs mandatory quality checks.

More information about how to complete the Tool and tips on quality review are in the [Verifier Guidance](#).



The Verifier Body is responsible for conducting an internal quality check on the report before it is finalized. Once the Verifier Body has completed the quality check and the Accredited Host checks have been executed and, if applicable, resolved by the Verifier, the Verifier must complete the verification, this will result in the assessment status change from “Verification in Progress” to “Verification Completed”.



Before the status changes to “Verification Completed”, an automated SLCP data quality check is conducted behind the scenes in a hidden status called “Verification Quality Check” (VRQ). This search for data quality failures takes a few seconds. If the data quality check fails, the assessment status automatically changes to “Verification being Edited” (VRE) and an email is sent from [info@slconvergence.org](mailto:info@slconvergence.org) to all assigned Verifiers of the verified assessment report. The Verifier must:

- review the email which outlines all the failures,
- make changes to the verified assessment report, as necessary,
- finalize the report – again – by changing the status from “Verification being Edited” to “Verification Completed”, and ideally
- do this all in less than 4 calendar days.

On calendar day 5 after the assessment status changes from “Verification in Progress” (via VRQ) to “Verification being Edited”, the assessment status automatically changes from “Verification being Edited” to “Verification Completed”, whether the Verifier made edits or not. This guarantees that the assessment process continues and the facility can start reviewing the verified assessment report.

If the automated SLCP data quality check does not result in failures, the completion of the verification goes through and the assessment is in status “Verification Completed”.<sup>2</sup>

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<sup>2</sup> The first Accredited Host to support the SLCP automated data quality checks will be FFC, followed by Higg Co. Contact the Accredited Host to obtain the most up-to-date status on the VRQ roll out.

SLCP regularly reviews and updates the automated data quality checks. Go to our [Helpdesk](#) to see which data quality checks SLCP is currently running.



**DOCUMENT RETENTION:** Verifier Bodies must follow local legal requirements relating to the minimum retention of notes, documents, photographs and/or client files. SLCP requests at least 12 months of retention to facilitate any Dispute or quality assurance procedures.

Note, as the Verifier and Verifier Body do not have access to the finalized verified assessment report (status VRF), Verifiers should save a copy of the report (likely the offline Excel version) for their records prior to changing the status to “Verification Completed”. Verifier Bodies can always ask the facility to share the finalized verified assessment report with them, but SLCP recommends downloading a copy at this point in the SLCP assessment process.

***21.-24. Facility reviews verified assessment, connects offline with Verifier/ VB for concerns and requests edits as necessary, accepts verification or raises Dispute***

Once the Verifier completes the verification report (for the first or second time after VRQ failures), the facility is notified via the Accredited Host platform, can access the verified assessment report online or offline in excel through download from the Accredited Host for review, and has 14 calendar days to review the report and request edits from the Verifier/ Verifier Body, as necessary.

Within these 14 calendar days, the facility can:

- Accept the verified assessment report on the Accredited Host platform, which changes the assessment status from “Verification Completed” to “Verification Finalized”.
- Dispute the verified assessment report due to Verifier not following Verification Protocol or complaints about Verifier conduct. This changes the assessment status from “Verification Completed” to “Verification Disputed”. When raising the Dispute on the Accredited Host platform, the facility will have to provide more detailed information about the Dispute, so the Verification Oversight Organization is well informed.
- Reach out to the Verifier/ Verifier Body for clarifications, concerns, questions about the verified assessment report, especially with regards to question level issues that do not relate to Verifier following Protocol or Verifier conduct.
- Change the status from “Verification Completed” to “Verification being Edited” if the facility and Verifier/ Verifier Body have jointly agreed to report edits.

After 14 calendar days, if the facility has not accepted the verification or raised a Dispute, the Accredited Host automatically changes the status of the assessment to “Verification Finalized”.



Should the facility and Verifier/ Verifier Body agree to changes to the verified assessment report at this stage of review, the facility must change the status from “Verification Completed” to “Verification being Edited” and give the Verifier access to the report again through the Accredited Host platform so the Verifier can make the agreed changes. Any changes the Verifier makes to the report after completion/ during this facility review phase must be agreed upon by the facility. After edits are finalized, the Verifier must change the status to “Verification Completed” – again – so the facility can access the report and review the changes. The Verifier must work as quickly as possible to finalize the edits and change the status back to “Verification Completed” so the facility has enough time to review the report a final time before finalization.

This back and forth between facility review in status “Verification Completed” and Verifier changing the report in status “Verification being Edited” can occur as often as necessary within the 14 calendar days. The Accredited Host has a “countdown clock” feature which will help the facility and Verifier see how much time is left until the assessment is automatically finalized and the status is changed to “Verification Finalized”. Also, emails will be sent to the Verifier and facility to remind each party of the impending deadline.

Should the Verifier need to make edits to the report, per facility request, SLCP recommends that the Verifier again saves a copy of the report for their records prior to changing the status to “Verification Completed”.

### ***25. If accepted: facility shares verified assessment via the Gateway and/or the Accredited Host***

There are three ways to share the verified assessment report, once the facility has accepted it:

- 1) When registering on the Accredited Host site, the facility will probably have already indicated which end users they would like to share the final verified assessment report with. Note, these approved end users (e.g. brands, retailers, customers, agents) will have access to assessment status information via the Accredited Host site. They will not have access to the self/joint-assessment data or verification data until the facility accepts the verified assessment report.
- 2) Should an end user not be associated with an Accredited Host, the facility may also share the verified assessment report with another party through the Gateway. The facility will require the email address for that end user.
- 3) If the facility wants to have the verified assessment report available on multiple Accredited Host platforms, they can initiate this linking/ sharing on the Gateway.

### ***26.–28. If Dispute: VOO deems substantiated or not substantiated***

Once the facility raises a Dispute, the Verification Oversight Organization is notified about the Dispute and receives the details of the Dispute via the information the facility filled out on the Accredited Host site.

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

An assessment that is in “Verification Invalidated” status cannot be shared with end users and the full report is not available on the Accredited Host site or Gateway. Sharing of the report is not possible. The only information available is that the facility has an invalidated report and the reason the report was invalidated.

### ***29. VOO Quality Assurance Procedures for accepted verified assessments***

The VOO can choose to conduct any type of quality assurance procedures for any verified assessment. More information about these procedures is in the [SLCP Quality Assurance Manual](#).

Reports for Desktop Review are selected within 10 working days of an assessment changing to “Verification Finalized” and the Desktop Review is completed within another 10 working days. Sites for Counter Verifications are usually selected within 2-4 weeks of the verification date and the process of scheduling, conducting the Counter Verification and completing the QA report could take up to 6 weeks.

QA activity by the VOO can result in invalidation of the verified assessment report, which means that the report can no longer be shared with end users and the full report is no longer available on the Accredited Host site or Gateway. The sharing will also be revoked. The only information available is that the facility has an invalidated report and the reason the report was invalidated.

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## Annex

## Annex I Verifier Expectations

SLCP considers all Verifiers to be representatives of their Verifier Bodies when engaging with manufacturers. Note that any sign of bias, favoritism and/or wrongdoing, even if perceived, could compromise the validity of the verification process. SLCP expects that all Verifiers will behave in a manner that (1) demonstrates the highest levels of ethics, professionalism, and respect; (2) maintains integrity by ensuring neutrality and avoiding any conflicts of interest; and (3) safeguards the well-being of the Verifier team. This section outlines SLCP's requirements in terms of ethics, Verifier behavior and competencies, and personal and facility safety.

### Ethics

Accepting gifts of any value from facility managers, workers or others related to the verification is inappropriate and is not permitted. Exceptions to the rule may include accepting offers for water, soft drinks, tea, coffee and snack food similar to the kind and value consumed regularly by those who are offering it.

SLCP adheres to a strict policy against bribery. In the event that a Verifier is offered money, gifts or other unsolicited items, the following procedure must be followed:

1. Refuse the offer immediately, and explain that such a practice is strictly prohibited;
2. Take a photo of the item, if possible;
3. Contact the VB and/or VOO to report the incident and seek further guidance (based on the advice given, either abort the assessment or proceed with the verification. If the Verifier feels threatened or intimidated in any way, the verification should be aborted).

### Prohibition on Sales

At no time should Verifiers engage in selling consulting or other services by their organization.

### Acceptance of Lunch and Travel

Verifiers must never allow management to take them out for lunch during a verification nor accept payment for lunch. If the facility orders lunch, Verifiers must pay them back for the lunch and explain that this is SLCP policy. Rides may be accepted to and from the facility only when there is no other option. When the Verifier(s) arrives at the facility, their behavior should reflect that of an independent third party. If workers see a Verifier coming out of a facility owned vehicle, workers may believe that they are working for the management and are therefore not independent. If there is a security concern with transportation or during any other part of the verification, the Verifier must contact his or her VB.

### Confidentiality

All information shared between the Verifier and a facility worker or manager and all information the Verifier gathers in the course of his or her verification is the property of the facility and must be kept strictly confidential. Such confidential information can be shared only within verified assessment reports and to parties designated by the facility. Verifiers may not e-mail or give hard copies of the verified assessment template or report to any party other than the applicable Accredited Host and/or SLCP administrator in instances where technical failure has occurred.

### Impartiality

The Verifier must maintain impartiality at all times. They must not take sides or appear to be taking sides in the event of any dispute at a facility. All complaints by facility workers, managers and/or third parties are to remain allegations until they have been properly investigated and objective evidence is found to support the claim(s). The Verifier must also disclose if they have had any personal or professional affiliation or relationship with the employment site that is subject to the verification.

### Respectfulness and Professionalism

The role of a Verifier is to effectively and impartially gather information which requires listening to the perspectives, opinions, and comments of all stakeholders regardless of their position within the facility.

Verifiers must be respectful of facility owners, managers, production workers, and other persons who may be involved in the Verification. Verifiers must be sensitive and respectful of gender, racial, cultural, and socio-



economic issues. Acting in a demeaning, confrontational, or harassing manner to any persons before, during, or after a verification will not be tolerated. Verifiers must possess effective listening skills and awareness of non-verbal communication.

Verifiers must always be courteous, conscientious and be generally business-like in demeanor in the workplace. Verifiers must dress and act in a professional manner at all times. Verbal or physical altercations of any type will not be tolerated between Verifiers and facility workers or management/ owners

#### **Personal Safety**

There may be cases where travelling alone is not considered safe due to local conditions, gender, or other reasons. In these cases, additional personnel or escorts must be included as part of the verification team. Verifiers that feel unsafe visiting a facility alone must notify their supervisor.

#### **Facility Safety**

SLCP believes that Verifiers, whether internal or external, are ambassadors for the entire program. The expectation is that they demonstrate the highest level of professionalism and execute the work in the highest quality manner, taking every measure required to be safe and ensure the safety of others. It is the responsibility of the Verifier to act in a safe manner when onsite at a facility. Verifiers must exercise best judgment and must not proceed if they feel unsafe.

Verifier Bodies want to ensure that Verifiers:

- Perform all duties in accordance with applicable federal, state, provincial, regional, and other applicable health and safety regulations.
- Follow all site-specific (e.g. facility) safety rules and requirements.
- Act in a safe manner at all times including wearing appropriate clothing and personal protective equipment (PPE) where deemed necessary (hats, suits, gloves, eye protection, etc.). The following PPE is recommended in the following cases. When in doubt, err on the side of caution:
  - Foot protection/ safety footwear (whenever there is risk of crushing or heavy objects dropping onto feet or whenever there is a risk of slipping (e.g. wet areas));
  - Eye protection in areas with potential for flying objects or splashing of chemicals;
  - Head protection in areas with the risk of fall hazards;
  - Noise PPE to reduce exposure in certain circumstances.
- If available, all Verifiers should locate and review the facility or building safety rules/ plans to understand site specific safety risks that may apply within the specific location/ building being visited. Be aware of potential high noise areas.
- Watch for machinery or other electrical devices that are not properly plugged in and be aware of frayed or exposed electrical wires. Never touch any electrical fixtures or wires that appear unsafe.
- Prior to conducting any inspections that involve heights, or going on rooftops, ensure safety measures are in place, such as safety harnesses.
- Refrain from touching, smelling, or making contact with chemicals. Be aware of chemicals around the facility and use judgment when interacting with these chemicals.
- Always be aware of machinery and/or tools with rotating parts.

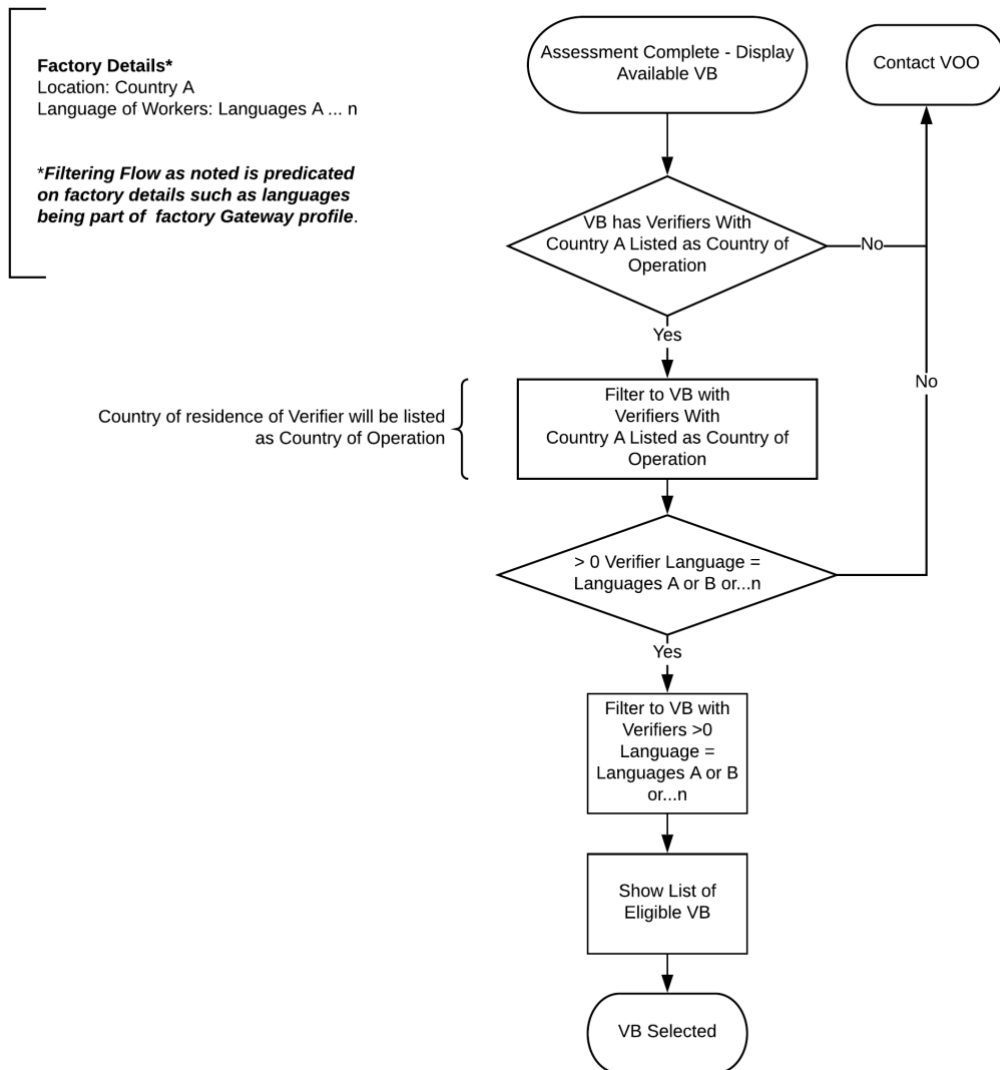
**Annex II: Filtering of Verifier Body and Verifier**

In order to enforce Verification Protocol rules regarding Verifier Body and Verifier selection, we are using available technology to filter in advance. Facilities choose the VB on the AH. Below is the flow chart for filtering of VB.

The rule as shown in the flow chart is that the initial Verifier selected must be eligible to verify in the verification country and speak (be listed in Verifier profile) at least one language listed by the facility as a language of the employees (>0 Language – Languages A or B or ...n). If there is such a Verifier, the VB will show as a possible selection for the facility on the AH.

For example, the factory has listed the following as employee languages:  
 English (A)  
 French (B)  
 Finnish (C)

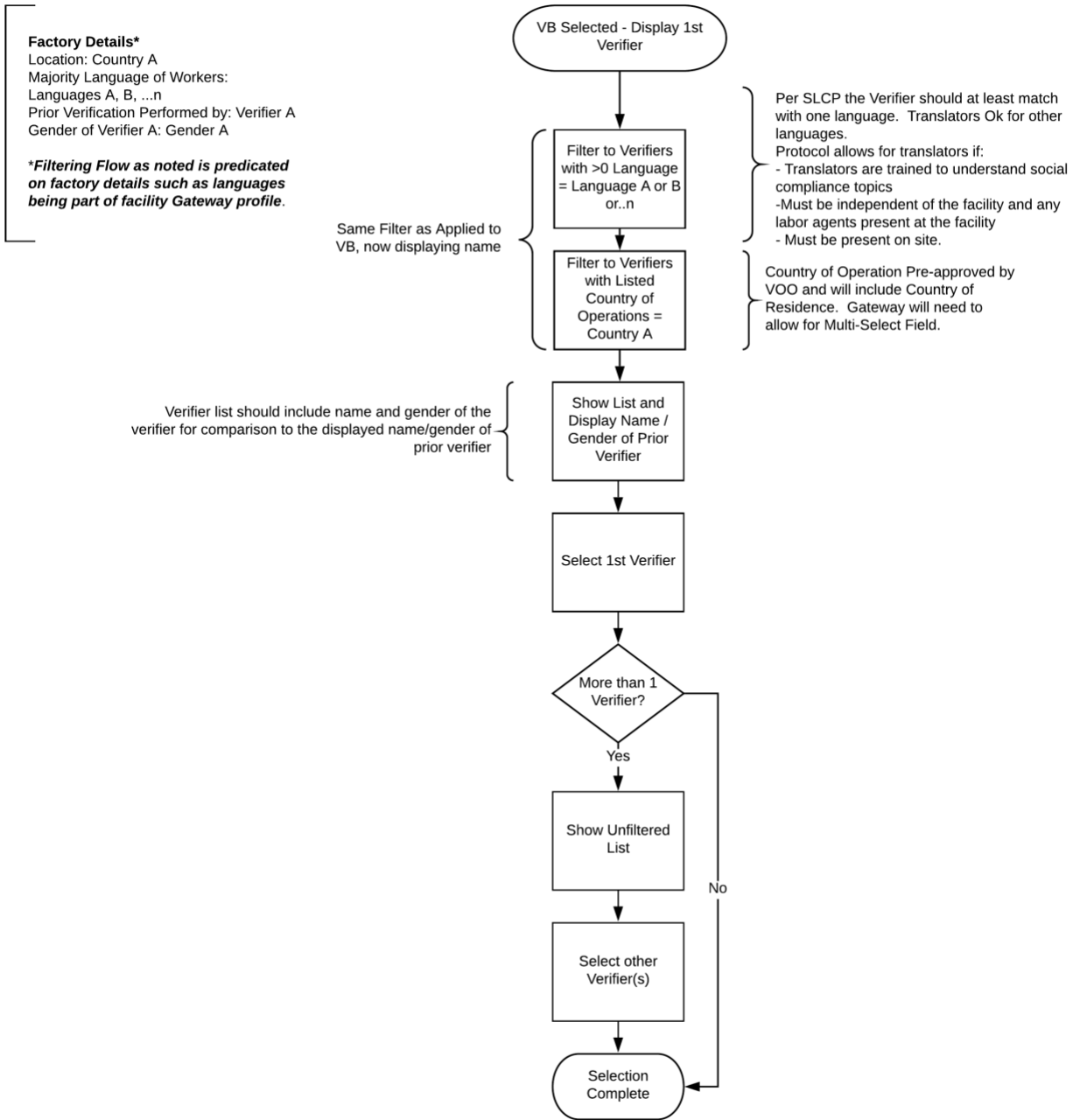
The filter will only show Verifiers that have either A, B or C listed in their profile.



Once a VB is selected by the facility on the AH, the VB selects the Verifier on the Gateway. Below is the flow chart for filtering of Verifiers that are associated to the VB. Rather than filter by Prior Verification and Gender,

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this data will be visible/transparent to the VB so that they may select based on Protocol Rules.



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### **Annex III: COVID-19 – Enhancement to Verified Assessment Report Information**

#### **Verifier Requirements for Completion of Verification Data Fields related to COVID-19**

##### **Introduction**

As we all know COVID-19 has disrupted supply chains and significantly impacted workplace conditions in facilities. To reflect this impact, we are hereby providing Verifiers with requirements on how information about the impact of COVID-19 on the facility must be included in the SLCP verified assessment report. This means that if the facility was affected by COVID-19 as it relates to the SLCP assessment scope, then the Verifier must provide more information. This document also indicates how facilities should respond to certain questions if they are impacted by COVID-19.

Contact us via the [SLCP Helpdesk](#) if you have any more questions.

##### **Reading Guide**

- **Area Impacted by COVID-19:** facility condition or process that is possibly impacted by COVID-19.
- **Data Collection Tool Question:** Tool question where information on possible impact can be captured.
- **Guidance for Facilities:** This indicates how facilities should respond to certain questions if they are impacted by COVID-19.
- **Verification Data Completion/ Information to Include, depending on facility circumstances:** type of information that must be included by the Verifier regardless of *Verification Selection* “Accurate” or “Inaccurate”.

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## SOCIAL & LABOR CONVERGENCE

Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
<b>Facility Closures and Changes in Workforce</b>			
Facility closures	FP-BI-9 Normal Hours of Operation per day:	N/A	If the facility has had any closures or reduction in normal working hours or changes to normal operations due to COVID-19 include this information under <i>Verification Data</i>
Reduction of workforce	FP-ED-2 Total Number of Production Employees  ep-11 In the last 12 months within this assessment period, has the facility experienced any mass layoffs as a result of economic, technological, structural or similar changes?	If the facility has laid off, retrenched or furloughed a significant percentage of workers as a result of COVID-19, the answer to ep-11 should be YES.	FP-ED-2 If differences between self-assessment completion and verification are due to COVID-19, include this in <i>Verification Data</i> .  ep-11 If the facility has experienced layoffs, retrenchments or furloughs due to COVID-19 under <i>Verification Data</i> note: <ul style="list-style-type: none"> <li>• Number of layoffs including gender breakdown (# of men vs # of women)</li> <li>• Number of temporary reductions (including workers who are furloughed or who have had their hours reduced). Include gender breakdown of workers who have had their hours reduced (# of men vs # of women)</li> <li>• For any temporary reductions note the duration of the reduction</li> </ul>

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Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
Conditions of work are non-discriminatory	disc-7 In the last 12 months within this assessment period, have other conditions of work for employees been dependent upon the following:		If conditions of work, such as, shift selection, access to overtime, demotion, etc. are impacted by COVID-19 check if this ever was dependent on certain factors such as gender.
Terminations/ retrenchments/ furloughs were made in a non-discriminatory manner	disc-14 When laying off employees does management follow objective, non-discriminatory criteria when selecting individual employees who will be retrenched/laid off?	N/A	If workers were terminated due to COVID-19, under <i>Verification Data</i> , describe the criteria that were used to decide which workers to terminate. If gender was a criterion, be sure to note that.
<b>Wages</b>			
Payment of wages	WB-14 In the last 12 months within this assessment period, were wage payments made on time and in line with legal or collective bargaining agreement requirements?	Facilities must consider any required payments to workers during closures due to COVID-19. Facilities must consider any required hazard pay/incentive pay to workers.  If the facility delayed any required payments due to COVID-19, the answer is NO.	Under <i>Verification Data</i> include information on changes to wage payment requirements (including pay due dates) as a result of COVID-19.
Payment of termination benefits	wb-27 Are termination benefits (including severance payments) in line with legal requirements?	Facilities must consider any legal requirements enacted specifically to protect workers terminated as a result of COVID-19.	If workers were terminated due to COVID-19, under <i>Verification Data</i> , describe what termination benefits were paid.

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Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
Paid leave	WB-23 In the last 12 months within this assessment period, please confirm if employees received time off - and were paid - for all forms of leave and if payments were in line with legal or collective bargaining agreement requirements:	If the facility was closed due to COVID-19 and the facility was required to pay employees during this closure, “other types of required leave” should be selected.  If workers who are diagnosed with COVID-19 are entitled to paid sick leave, “sick leave” should be selected.	If “other types of required leave” is selected due to paid COVID-19 leave, under <i>Verification Data</i> describe the required terms of payment.  If “sick leave” is selected under <i>Verification Data</i> describe any special provisions for paid sick leave due to COVID-19 .
<b>Working Hours</b>			
Overtime	WH-7; WH-7--1; WH-7--2  In the last 12 months within this assessment period, did any employees work more than 60/72/90 hours in total (regular + overtime) within any given week?	N/A	If the answer to any of these questions is yes, and if overtime was worked due to COVID-19 impacts, describe this under <i>Verification Data</i> . Include details such as whether the overtime was due to a reduced workforce or closures that impacted production planning.
Timekeeping	WH-1-4x How are hours of work recorded for all employees?	If the facility has changed their method of timekeeping as a result of COVID-19 (e.g., switching from biometric to manual timekeeping), both methods of timekeeping should be selected.	If the facility has changed their methods of timekeeping (e.g. from biometric to manually) to prevent the spread of COVID-19, under <i>Verification Data</i> indicate that more than one timekeeping system was used due to COVID-19.  If the facility uses biometric timekeeping, under <i>Verification Data</i> indicate how the biometric timekeeping system is sanitized to prevent spread of COVID-19.

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## SOCIAL & LABOR CONVERGENCE

Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
Grace period for clocking in and out	WH-3--1-4x Start and finish times in the payroll system match exact time in/out in time records	To allow for social distancing, facilities may implement a grace period for workers clocking in and out. If workers are required to clock in/out before/after the start of their shift and they are NOT compensated for this grace period, the answer to this question should be NO.	If the facility has a grace period for clocking in and out under <i>Verification Data</i> indicate if this was implemented to allow for social distancing and how long the grace period is.
<b>Testing and Treating Confirmed Cases</b>			
COVID-19 testing	disc-10 Does the facility require infection or illness tests (i.e. HIV/AIDS or Hepatitis B) at any time during employment?	If the facility requires COVID-19 testing for workers, the answer to this question should be YES	If the facility is requiring COVID-19 testing, under <i>Verification Data</i> , describe the details of the process (when, how often, how, who, etc.).
Policies and procedures for dealing with contagious illnesses	HS-18 Does the facility have a written Emergency Response Plan?	N/A	Under <i>Verification Data</i> , note if the facility's emergency response plan includes dealing with widespread contagious illnesses. Note if the facility has implemented any new procedures for dealing specifically with COVID-19. If the facility has implemented COVID-19 specific procedures, describe what they address. Note any local regulations to prevent the spread of COVID-19 that apply to the facility and how the facility is complying with these regulations.



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Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
Right to refuse work	<p>HS-29 Are employees able to remove themselves from imminent danger in the workplace without seeking permission?</p> <p>HS-29--1 Have employees who refused to work in unsafe conditions ever faced any negative consequences?</p>	If there are confirmed cases of COVID-19 in the facility and workers are not permitted to refuse work due to safety concerns, the answer HS-29 should be NO.	<p>HS 29 If there are confirmed cases of COVID-19 at the facility, under <i>Verification Data</i> indicate if the facility allows workers to refuse to work (with or without permission).</p> <p>HS 29-1 Workers who have refused to work due to confirmed cases of COVID-19 must be considered when answering this question.</p>
Workers diagnosed with COVID-19	HS-52 Does the facility track all types of employee illness?	N/A	Under <i>Verification Data</i> note the number of workers with confirmed cases of COVID-19.
Medical facilities	HS-51--1 Does the facility have on-site medical facilities/clinic(s)?	N/A	If the facility has medical facilities, describe what measures have been taken to protect medical facility staff (e.g. face shields, body suits) and to prevent the spread of COVID-19 in medical facilities (e.g. isolating workers with suspected cases of COVID-19, increased disinfection).
<b>Preventative Measures</b>			
Cleaning program	HS-4 Does the facility have a regular facility cleaning program in place?	HS-4 If the facility undertakes regular cleaning/sanitizing to prevent the spread of COVID-19, the answer to this question should be YES.	HS-4 Under <i>Verification Data</i> , provide details of how the cleaning program prevents the spread of COVID-19.
Hand washing	HS-5-3x Hand washing facilities are provided		HS-5-3x If additional hand washing/sanitizing stations have been installed to prevent the spread of COVID-19, indicate this under <i>Verification Data</i> .

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Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
PPE	HS-31 Are employees provided with Personal Protective Equipment (PPE)?	HS-31 If workers are provided with PPE <b>specifically</b> to prevent the spread of COVID-19, the answer to this question should be YES.	HS-31 Under <i>Verification Data</i> , indicate if workers are provided PPE (masks, respirators, face shields) <b>specifically</b> to prevent the spread of COVID-19. If PPE is provided specifically to prevent the spread of COVID-19, indicate if workers are trained on how to properly use PPE to prevent the spread of COVID-19.
Dormitories	HS-55--2-2x Accommodations are clean and safe		HS-55--2-2x If the facility has dormitories, under <i>Verification Data</i> indicate any measures the facility has implemented to prevent the spread of COVID-19 in dormitories. Note specifically if the facility has implemented curfews in dormitories to prevent the spread of COVID-19.
Canteens	HS-56--2-3x Food preparation, storage, and eating areas are kept clean, safe, and hygienic (including temperature, ventilation, light, noise etc.)		HS-56--2-3x If the facility has a canteen, under <i>Verification Data</i> indicate any measures the facility has implemented to prevent the spread of COVID-19 in the canteen.
General	add-11 Does the facility have any additional comments to share regarding their health and safety practices?	add-11: <ul style="list-style-type: none"> <li>Under <i>Verification Data</i> indicate any preventative measures the facility has taken to reduce the spread of COVID-19 (e.g. re-arranging workstations to be 6 ft apart, installing barriers between workstations, etc.). Include measures taken for all parts of the facility including the production floor, dormitories and canteens.</li> </ul>	add-11 <ul style="list-style-type: none"> <li>If the facility has not provided information, select “Accurate” but under <i>Verification Data</i> indicate any preventative measures the facility has taken to reduce the spread of COVID-19 (e.g. re-arranging workstations to be 6 ft apart, installing barriers between workstations, etc.).</li> <li>If the facility has not provided information, under <i>Verification Data</i> indicate any measures the facility has taken to reduce</li> </ul>

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Area Impacted by COVID-19	Data Collection Tool Question	Guidance for Facilities	Verification Data Completion/ Information to Include
		<ul style="list-style-type: none"> <li>Indicate any measures taken to reduce large gatherings of workers such as group trainings and emergency evacuation drills.</li> <li>Indicate any measures taken to prevent the spread of COVID-19 as workers enter the facility, such as temperature checks.</li> <li>Indicate what communications workers receive about COVID-19 and how workers are trained to prevent the spread of COVID-19.</li> </ul>	<p>large gatherings of workers such as group trainings and emergency evacuation drills.</p> <ul style="list-style-type: none"> <li>If the facility has not provided information, under <i>Verification Data</i> indicate any measures the facility has taken to prevent the spread of COVID-19 as workers enter the facility, such as temperature checks.</li> <li>If the facility has not provided information, indicate what communications workers receive about COVID-19 and how workers are trained to prevent the spread of COVID-19.</li> </ul>
<b>Impact on Verification Process</b>			
Impact on the verification process	Verification Details section - Verification observations – any other comments	N/A	Note if COVID-19 had any impact on the verification process, e.g. if certain areas of the facility were not operational.

## Annex IV Verification Communication Template (suggested communication)

Dear Facility Representative,

Thank you for choosing [Verifier Body name] to complete the verification of your [self][joint]-assessment.

### Role of the Verifier

SLCP is standard agnostic which means there is no judgment or scoring of the data. The Verifier's role is to check the correctness and completeness of your information provided in the Data Collection Tool. Our Verifiers and [Verifier Body name] will adhere to the SLCP Code of Conduct, see attached.

### Completing your assessment on the Accredited Host platform

Facilities can complete the SLCP assessment on an Accredited Host platform or offline in excel. If you choose to complete the assessment offline, you will need to upload it when finished to your chosen Accredited Host platform. The platform will check your assessment and will tell you if you need to add more data or edit any entries. You can also upload documents to the Accredited Host platform if you want us to do some off-site review. You can upload documentation. We ask that you do not upload any sensitive information, such as personally identifiable information relating to your employees, or any proprietary information.

### Timeline

The Verifier must receive your completed assessment with applicable uploaded documentation no later than 10 working days prior to the scheduled [verification date][verification window]. Verification must happen within two months of completion of the self/joint-assessment. The Verifier will check the date in the Data Collection Tool, Facility Profile section, Row 30 far right column UVW (offline Excel location) question FP\_BI-22: *Date of self/ or joint-assessment submission (DD/MM/YYYY)*. If this date is more than two months from the date of verification,, you must contact SLCP through the [Helpdesk](#) to change the status of your assessment back to ASI (Assessment Initiated) so you can update the self/joint-assessment.

### Verification details

The scheduled [verification date][verification window] is:

- The number of person-days required to complete the verification are:
- The number of calendar-days we will be onsite are:

If the off-site documents review is deemed appropriate and sufficient information is provided by the facility, the number of days listed above may be decreased by a maximum of one person-day.

- We will be sending [number of Verifiers] Verifier[s] to conduct the onsite verification. The Verifier[s] [has][have] the following notable characteristics: [Include information about gender and language capabilities at a minimum]. [Also include information on any applicable trainees, assistants, translators or other individuals joining the verification].
- To get in touch with the Verifier[s] you can email [address] or phone [number].

### Verification process: What to expect

- During the onsite verification we will conduct a facility tour, check documents and interview both management and workers.
- The Verifier(s) will require access to all areas of the facility and its grounds, photographs (respecting and avoiding proprietary information)
- The Verifier will conduct confidential interviews with employees and management. The interviewing of workers is done as part of their employment and as such, workers should not be financially penalized or retaliated against, abused or harassed in any form for participating in the interview process. Furthermore, during the opening and closing meeting it is important that senior management and employees' representatives (as applicable) are present.
- To prepare for the onsite documentation review, please find the attached Document List for your information. We appreciate your cooperation. At the end of the verification, we will conduct a closing meeting to review the verification summary at a high level.

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- For more details about the verification process, please read the [Verification Protocol](#).

**After the verification: What to expect**

We will complete the verified assessment report within ten working days. You should have all information ready for the onsite verification. Only under exceptional circumstances (e.g., non-access to documentation or information due to absence of key management personnel on the days of the verification assessment), may you provide additional information up to two days *after* the onsite verification.

After you have reviewed the verified assessment (14-calendar day window after Verifier completes report) and accepted it, you can share the verified assessment report with anybody you choose via the Gateway or your chosen Accredited Host. As this is not a compliance audit, we will not provide information about corrective action plans.

**Concerns or disputes**

Should you have concerns or questions about the verified assessment report during your 14-calendar day review period, you can directly reach out to us for clarification. If applicable, we can make edits to the verified assessment report. Edits will only be made with your knowledge and approval. Should you have concerns about the report quality, as it pertains to the Verifier following Protocol or Verifier conduct, you can also raise a formal Dispute and involve the Verification Oversight Organization. For more information about Verification Oversight, please see: <https://slcp.zendesk.com/hc/en-us/sections/360003592500-Verification-and-Data-Quality>

**COVID-19**

If your facility is affected or was affected by COVID-19, we will regularly contact you for updates on workforce and facility operations to ensure there are no substantial changes to your [self][joint]-assessment that could affect the onsite verification process. Please note that SLCP has issued a *COVID-19 – Enhancement to Verified Assessment Report Information* document which also contains information for facilities on how to complete the self/joint-assessment. Please find it attached.

For further information about SLCP, please go to <https://slconvergence.org/helpdesk>.

Kind regards,

[Verifier Body name/ Sender name]

## Annex V Document List

### List of Documents/Records to be made available to the Verifier(s)

#### Factory Profile:

1. Company Profile
2. Business Registration License
3. Tax Registration
4. Organization chart
5. Land use/construction permit
6. List of Machineries
7. Company vehicle list
8. Production process flow chart
9. List of subcontractors, if any
10. Dormitory details
11. List of Fire equipment
12. Any certificate by any other independent organization like SA8000, ICTI etc.
13. Building approval plan (architectural & structural) from concern Govt. authority; Approved building construction lay out from engineering authority, if applicable
14. Building layout approval from fire service & Fire Occupancy Certificate
15. Employee name list

#### Recruitment / Hiring & Termination

1. Recruitment policies and procedures & Age verification process
2. Child Labor Remediation Procedure
3. Security Service Contract
4. Training Records other than Health & Safety
5. Work permits (internal /external)
6. Employment Contracts
7. Job announcement/description, job application form, if applicable
8. Labor broker contract & dispatching worker personal records/contract
9. Apprenticeship program (if applicable)
10. Immigrant workers (working permit /visa, passport, contract, personal records)
11. Adolescent workers (registration/approval letter from local labor bureau, health checking record)
12. Termination policy and procedure, training records
13. Employee resign records

#### Working Hours:

1. Time in/out records (Working hour & overtime hour records)
2. Production records (Cutting, stitching, quality etc.)
3. Overtime waiver if any
4. Comprehensive working hours permit if applicable
5. Working hours policy including voluntary overtime policy
6. Overtime approval process/procedure and OT request records, if applicable

#### Wages & Benefits

1. Minimum wage Notification
2. Payroll (Wage records)
3. Full & Final Settlement
4. Leave records
5. Bonus records
6. EOBI (Employees Old Age Benefit) records
7. Social security records & commercial insurance records
8. Receipts showing tax payments / social security remittances to appropriate public agencies

9. Evidence of granting maternity/paternity leave and subsequent return to work
10. Piece rate wages sheet, if applicable
11. Annual leave and any paid leave payment record
12. Bank transferring records (for wages if applicable)

**Employee Treatment & Involvement:**

1. Records from disciplinary procedures
2. Meeting notes from any type of worker/management committee
3. Trade union records
4. Grievance register / Grievance mechanism (procedure, intake channel, investigation/ solution/ feedback records
5. Org Chart of Trade union, worker/management committee
6. Written policies regarding anti-harassment, physical/sexual/emotional abuse and non-discrimination, no forced labor
7. Freedom of association procedure

**Health & Safety:**

1. Building plan approval / Permit
2. Fire NOC
3. Genset installation approval
4. Building Stability Certificate
5. Appointment of Labor Welfare / Safety Officer
6. Drinking Water Potability test
7. Boiler License
8. Lift License / Inspection certificate
9. Boiler Operator and Electrician Certificate
10. Noise and Illumination level test Certificate
11. Sanitation Certificate
12. Health Certificate for Workers
13. Doctor / Nurse Appointment Letter
14. First Aid Training Certificate
15. Fire Fighting Training Certificate
16. Fire Mock drill training records
17. Industrial accident records
18. Pollution Control board – Consent order
19. Waste disposal records / Procedures
20. Personal Protective Equipment (PPE) training records
21. Chemical safety training records
22. List of chemicals used (Hazardous / Non-hazardous)
23. Material Safety Data Sheets (MSDS) records
24. Maintenance records of eye wash station
25. Machines maintenance/service records
26. Lock Out/Tag Out survey report, LOTO training records
27. Water Extraction Permit, if applicable
28. Permit for onsite waste disposal
29. License issued by government authority to hazardous waste collector
30. Contract agreement with licensed contractor for hazardous waste collection
31. Hazardous Waste Transfer Contract/ License of Hazardous Waste Handler/License of Hazardous Waste Transporter/Hazardous Waste Manifest, if applicable
32. Waste inventory and tracking records
33. Wastewater monitoring records
34. Flow Chart (indicating all key processes)
35. Drainage layout
36. Waste treatment equipment's maintenance records
37. Wastewater Treatment Plant operator certificate, if applicable

38. Approval of waste treatment system i.e. IEE (Initial Environmental Examination) / EIA (Environmental Impact Assessment)
39. Environmental Impact Assessment Reports and Approval / Environmental Protection Acceptance Report / Pollutant Discharge Permit if applicable
40. Air emissions control equipment's maintenance records
41. Ozone Depleting Substances (ODS) inventory and maintenance records
42. Fuel consumption record for factory's transportation
43. Green House Gases (GHG) emissions inventory
44. Emergency response plan including relevant training and drills records
45. Risk Assessment (procedure & records)
46. Banned Chemicals List, if any
47. Vehicle operator licenses for any/all types of motorized vehicles
48. Meeting notes from recent health and safety committee
49. Air receiver is fit to operate certificate
50. Steam receiver is fit to operate certificate
51. Food test reports
52. Accident records / accident analysis records
53. Electrical safety test report
54. Thermographic survey report
55. VOC test reports /Air emission monitoring report if applicable
56. Cooling tower water reports / legionella reports
57. Inspection reports (fire hydrant system, sprinkler, detection system, extinguisher, firefighting equipment, emergency lamps)
58. PPE suitability assessment, PPE selection criteria, PPE list, PPE inspection records
59. Confined space list, confined space entry procedure
60. PCB survey, PCB training records PCB
61. Asbestos survey, training records
62. Food supplier's medical reports
63. PHI report for the canteen
64. Canteen License
65. Hot Work operation procedure
66. Compressed gas cylinder operation procedure
67. Work permits for special & dangerous operations – forklift driver, lift operator, Electrician and Welder, boiler operator

**Management Systems:**

1. Social & Labor Policies and Procedures (including goal/strategy/performance, responsible persons (roles & responsibility, CSR team org chart)
2. Factory rules and regulations / Employee handbook
3. EHS policy & procedure
4. Communication and training records for employees, suppliers, subcontractors
5. Internal audit records and improvement plan



## **Annex VI SLCP Code of Conduct**

Document Verifiers agree to during Verifier qualification process:

SLCP expects individuals vetted and approved through the Verification Oversight Organization (VOO) to follow the principles outlined in the *SLCP Code of Conduct*.

### **Integrity**

*Conflicts of interest and impartiality:*

SLCP verifications must be impartial and avoid conflicts of interest that, in fact or in appearance, may create an incentive to report anything other than the true and accurate facts gathered during the SLCP verification.

*Corruption:*

Verifier Bodies shall manage risks and ensure compliance with all applicable laws related to corrupt practices.

*Integrity:*

Members must promote a culture of integrity to address audit integrity and bribery risks that may exist before, during and after each social compliance audit.

*Confidentiality:*

Members must maintain confidentiality with respect to information gathered while executing a social compliance audit, in order to minimize the possibility of inadvertent disclosure, and take reasonable steps to prevent unauthorized access to information collected during or relating to an audit.

### **Competence**

*Personnel:*

Verifier Bodies shall only deploy social compliance audit personnel (whether direct employees or independent contractors) who demonstrate, at a minimum, the relevant knowledge, skills and attributes outlined in the SLCP Competency Framework, and are going to act in accordance with the Code.

*Supervision:*

Verifier Bodies shall ensure all their personnel are adequately supervised to ensure all work is performed as directed and supports the verified assessment data.

### **Verified Assessment Data and Records**

*Report Generation and Submission:*

Verifier Bodies shall ensure an accurate, concise, and clear verified assessment report, signed off by an SLCP approved Verifier and Verifier Body, is provided to the facility.

*Supporting Documents:*

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Verifier Bodies shall ensure each verified assessment report is supported by evidence demonstrating the work performed in sufficient detail to support the information deemed as accurate or inaccurate in the final dataset.

*Handling of Sensitive Information:*

Sensitive issues, such as abuse or harassment which may lead to retaliation against workers, or attempts to bribe, threaten or coerce Verifiers shall be handled with utmost care to protect workers and Verifiers.

*Record Management:*

Verifier Bodies shall have systems in place to ensure all data is collected, stored and transferred in compliance with applicable law, is secure and only accessible by authorized persons.

**Obligations to SLCP and VOO**

*Transparency with SLCP and the Verification Oversight Organization (VOO):*

Upon request by SLCP and/or the VOO, true and accurate information shall be made available by Verifier Bodies to verify conformance with SLCP expectations.

*Accountability:*

Verifier Bodies shall develop and uphold principles which reflect integrity and professional ethical behavior as outlined in this document. They will comply with all applicable laws and regulations, policies and procedures, follow professional business practices, and have processes in place for handling complaints and appeals.

*Verifiers*

In SLCP's Competency Framework, Verifiers are committed to act in accordance with items in this document. All Verifiers, shall comply with all relevant legislation, policies and procedures, and maintain the integrity of the Code

Verifiers are only able to carry out verification as part of an approved Verifier Body.

**Obligations of SLCP and VOO**

*Privacy and Data Protection:*

SLCP and VOO shall only collect information from Verifiers and Verifier Bodies that is necessary to determine their eligibility to participate in SLCP. This information will only be accessed by SLCP and selected VOO employees as required in the execution of their duties, unless express permission is given by the Verifier or Verifier Body. SLCP complies with international data collection, privacy and security standards requirements, and ensures all information is collected and maintained in a way which protects the privacy of the Verifiers and Verifier Bodies.

*Openness:*

SLCP and VOO will provide public access to, or disclosure of, appropriate and timely information about the SLCP process, and status (i.e. the granting, extending, maintaining, renewing, suspending, reducing the scope of, or withdrawing of permission to act) of any Verifier, in order to gain confidence in the integrity and credibility of the process. Openness is a principle of access to, or disclosure of, appropriate information.

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**CONVERGENCE**

## Annex VII Additional On-site Verification Information

### WALKTHROUGH/ ONSITE OBSERVATION:

SLCP recommends interacting with the employees during the walkthrough by asking them to demonstrate things, like:

- Where is your nearest fire exit?
- Who is your fire warden?
- How do you transfer this chemical into that pot?
- How do you move this fabric to that shelf?

Some important areas to consider are:

- Site perimeter: facility external premises and immediate perimeter of the facility, including loading bays, waste storage, chemical storage, emergency assembly points, sub-facilities, canteens, dormitories or any other accommodation provided to workers by the facility, even if not in the same location
- Fire safety plans and equipment, evacuation notification system and route markings, and emergency exits
- Actions of employees towards cleanliness and safety
- Attitude of line supervisors and department heads towards employees
- Location and capacity of clocking in & out machines and/or attendance records
- Production lines
- Hygiene facilities including toilets, hand washing, hand drying and potable water
- Raw materials storage, finished goods storage, areas and access control procedures
- Boiler room and compressor house
- Power generator (if any)
- Wastewater treatment plant (if any)
- Internal and external transport area (if applicable) and shuttle buses (if provided by company)
- Checking the roof (if possible)
- Any locked rooms that the Verifier was not able to access (if any concerns)
- Additional areas that may or may not be present include confined spaces, elevators, childcare facilities, medical clinic, canteen or kitchen

### WORKER INTERVIEW:

SLCP expects all Verifiers to already be experienced in interviewing techniques before they are approved to carry out verifications.

Key principles for achieving good quality of information:

- **Representation:** seek a variety of views across all types of roles within the facility
- **Outliers:** identify those persons likely to represent the highest/ lowest scale of a given practice such as working hours or wages
- **Seniority:** include the newest employees to understand the orientation process
- **Leadership:** connect with employee representatives such as union officials or committee members or any type of elected representative
- **Efficient approach:** be courteous on the amount of time for an interview, recognizing that the time represents potential earnings to the employee (and his/her work group)

SLCP recommends the selection of interviewees with these qualities in mind (illustrative only – each facility will vary):

- New hires
- Employees under probation
- Young employees
- Apprentice/ student employees
- Union/ worker representative
- Pregnant employees
- Employees returning from maternity leave

- Employees from any other vulnerable group
- Temporary/ contract employees
- Fixed term/ non fixed term contract employees
- Employees from different departments, different salary levels, different job positions
- Workers of various nationalities (including migrant employees and foreign contract employees)
- Persons performing hazardous work such as chemical storage and disposal
- Relatively gender-balanced, ensuring representation in the case of a small minority

To make the most of the interviews, SLCP recommends the following process:

- Interviews should take place the morning of the first day of verification, with further interviews taking place in the middle and towards the end of the verification to corroborate information the Verifier has found.
- Discussions should take place in a quiet, private area away from management offices with no representatives of management present.
- Informal discussions should also take place during the physical tour of the employment site, at lunch time or during breaks, with care not to prevent employees from eating or taking appropriate rest.
- Explain the purpose of the verification and that all interview information will be unattributed.
- Begin the interview process with questions that are most likely to elicit routine and uniform data such as contracts, the orientation process and emergency evacuation practice, to validate that employee experiences are consistent with documentation. If the early data is consistent, then eliminate those questions in favor of issues where more variance is expected.
- Focus conversations towards issues that are likely to vary by position and supervisor such as: enforcement of safety rules, disciplinary process, grievance procedure, harassment, use of contractors on site and assignment of overtime.

Be aware that the individuals involved may not directly address sensitive issues. Because of that, it can be useful to ask whether employees in another area potentially experience problems like harassment or intimidation by supervisors. This second-hand information may indicate an opportunity to expand the interview sample, and if corroborated or if other employees second-hand repeat the same information must be added to verification data in the appropriate section.

#### MANAGEMENT INTERVIEWS:

Management interviews should be used to gain better understanding of:

1. General overview of facility management (who is in charge of what);
2. How the facility is organized (e.g. departments, sections, lines);
3. How workers are managed (e.g. line leaders, supervisors, department managers);
4. What the facility management see as risks to their business;
5. How workers are managed throughout the employment cycle (e.g. recruitment, onboarding, payment, leave, termination);
6. What human resources policies and procedures are;
7. How workers communicate issues to management;
8. What health and safety policies and procedures are.

Some general guidance around management interviews:

- Try to determine in advance which facility personnel you will need to speak with and when;
- Use the opening meeting to confirm their availability and adjust as necessary;
- Ask open ended questions to gather data;
- Try to keep management interviews conversational rather than a series of yes/no questions;
- If management shares information that requires follow up, ask additional questions and use triangulation with record review and worker interviews as necessary;
- Manage your time effectively: be respectful of facility management's schedules and also be aware of how much time you have allotted to complete the verification;
- Be polite but firm if management tries to influence the outcomes of the verification;

**Converged Assessment.  
Collaborative Action.  
Improved Working Conditions.**

**SOCIAL & LABOR  
CONVERGENCE**

- If during the interview you find inaccuracies or legal flags, share this information immediately and do not wait till the closing meeting;
- Remain impartial: it is not the role of the Verifier to enforce requirements or a specific compliance standard).