

Social and Labor  
Convergence Project  
(SLCP) Verification  
Protocol

October 19, 2017

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**Disclaimer:**

*The purpose of this prototype is to be pilot tested and reviewed by stakeholders. Feedback will be captured and integrated into an improved version in early 2018. This version is not for further distribution.*

*The proto2 social and labor assessment framework consists of three elements: 1. data collection & verification tool, 2. verification protocol, 3. verifier guidance. Each of the files should be reviewed in conjunction with the other 2 elements of the framework.*

## 1. Introduction to the Social and Labor Convergence Assessment Process

The Social Labor Convergence Project (SLCP) assessment process comes in two stages: (1) the data collection stage; and (2) verification of data. The SLCP framework consists of three files, which are linked together and should always be considered in total (See diagram below).

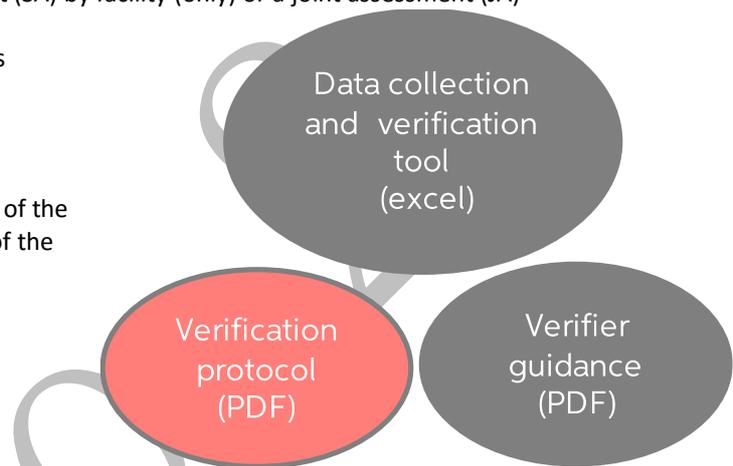
### STAGE 1:

The data collection can be either done by self-assessment (SA) by facility (only) or a joint assessment (JA) (facility + external assistance) *via the Data collection & verification tool (without verification tabs)*. In both cases (SA/JA): Verification will follow – stage 2

### STAGE 2:

The Verifier will check the correctness and completeness of the data gathered through the assessment tool. The output of the Verifier's work will be to confirm or amend the *original* assessment report data.

*\*Protocol, Verifier pack (integrated in data collection & verification\_tool), Supporting material: verifier guidance*



## 2. Introduction to the Social and Labor Convergence Verification Process

This document is the Verification Protocol which specifies procedures and process requirements regarding the verification of the social and labor convergence assessment. It is part of a trio documents which are the outputs of the project. This SLCP verification protocol was developed to organize and harmonize the verification of information reported in the SLCP Convergence Tool. The objective of the SLCP verification process is to verify the assessment data collected and reported by facilities.

Additional information on the project can be found at <http://slconvergence.org/> and in the Annex included in this document.

It is important to highlight that this is not a conformance type of assessment/ audit to determine whether actual conditions comply with the requirements of a 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 project will specify:

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

## 3. Verification Concept and Principles

The following principles shall be adhered to in the completion of the verification process by approved verifiers:

1. The Verifier will check the accuracy and completeness of the data provided through the assessment tool. This differs from an audit as the Verifier is not required to attribute a judgement of the information collected.
2. A “verified assessment report” will provide basic data that may inform any audit program, whether proprietary or industry-wide.

3. Elements of a traditional audit program outside the scope of this work include: (a) any conformance with a standard; (b) any time frame or opportunity to make improvements to practices prior to report publication; and (c) any recommendation for a corrective action process.

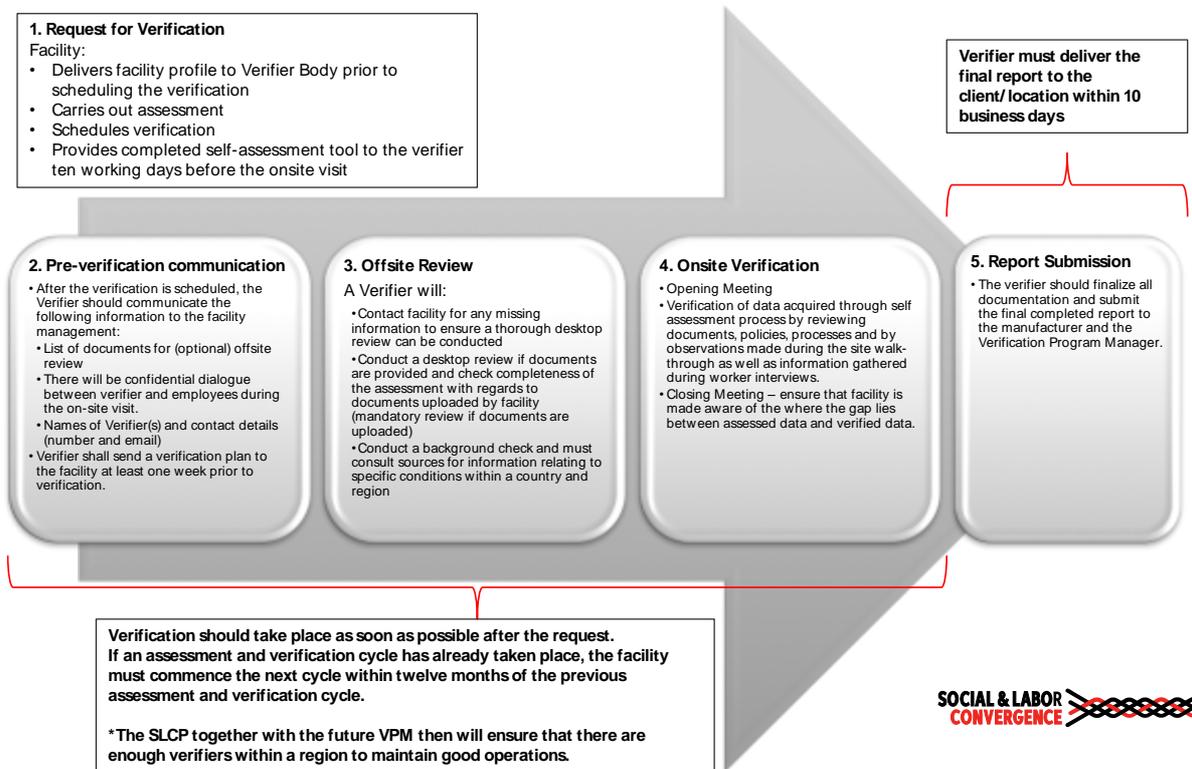
**4. Eligibility of Verifiers**

Only SLCP authorized Verifiers can produce a valid verified assessment report. Authorized verifiers:

- Must belong to a 2<sup>nd</sup> or 3<sup>rd</sup> party organization
- Have undergone the prerequisite training and/or accreditation/ approval process as determined by the appointed Verification Program Management Organization (VPM) and the SLCP.  
May belong to either brands, retailers, manufacturers, agents/licensees as well as verifying bodies (*note that verification program management process is under development*).

**5. SLCP Verification Process**

**Verification Process Map and Timeline**



In addition to this Protocol, the Verifier has at their disposal two additional documents (see Section 2):

TOOL/DOCUMENT AVAILABLE
○ SLCP Data Collection & Verification Tool- Verification tabs
○ SLCP verifier guidance

**SLCP data collection & verification tool**

- Purpose: to collect S&L data (by facility SA or Facility + external party (JA) and validate the data (by verifier)

- This is an Excel file. In this file, three columns are relevant for the verifier following the initial question:
  - Verification Selection
  - Verification Data
  - Corrected Response
- Two further tabs are available after follow-up questions:
  - Verification Selection
  - Verification Data
- Verifiers have access to these three columns via a login code – this will be explained during the Verifier training
- Verifiers will use the Verification Report tab to provide any additional information about the verification

### Verifier guidance

- Purpose/scope: example questions to illustrate to verifiers how to respond to different kinds of questions, allowing them to extrapolate for the remainder.
- This is a PDF document to be used as a reference by the verifier.

### 5.1 Request for Verification

*Prerequisite: Completed assessment using the SLCP Data Collection & Verification tool*

#### Initiation of the verification

The facility is responsible for requesting a verification of the data in the assessment tool. A facility is to contact an approved Verifier to initiate the verification process. In some situations, with the explicit agreement of the facility exceptions to facility initiation are possible:

- Buyer requests verification and contracts the Verifier -
- A standard holder requests an SLCP verification of a participating facility
- An industry association arranges for members to undertake SLCP assessment and verification

In any of the above cases, the facility and the Verifier must agree in writing to a specified date or date range for onsite verification. It is expected that a completed assessment is delivered to the Verifier no less than ten working days before the agreed verification date or date range. Failure to submit the assessment on time will be considered grounds for re-scheduling the onsite visit date or date range. The Verifier will make the decision to reschedule no later than five working days in advance of the onsite verification date.

The facility is required to share “facility profile” data from the assessment to ensure effective planning and scheduling by the Verifier. The facility profile is the only pre-requisite for the scheduling process. If the profile data is not complete, the Verifier may request additional information to help with planning.

#### First check Verifier: completeness of data collection by facility

If a Verifier receives an assessment where 25% or more of the answers from the facility are not completed, the Verifier will request to reschedule the assessment at least 90 days into the future and encourage the facility to seek a Joint Assessment in the meantime to support the collection of more data.

This option allows facilities to reach a 100% completion rate and proceed with scheduling verification even in the case where they may have questions about or lack the necessary data for a particular issue.

#### Scope of Verification: Twelve Months

Data collected in the assessment tool is from a designated 12-month period; Verifier can look at any data from any time within the 12-month assessment period to verify the assessment data (minimum sampling requirements see Onsite Verification section). If the data is deemed

‘inaccurate’ by the Verifier, he or she will only make a correction to assessment data if the evidence for correction is within the same time period as the assessment.

**Onsite verification planning**

During the pilot, Onsite verification will be “**announced**”. Therefore, in planning, the verifier must consider local/national holidays as well as any specific dates that the facility will be unavailable for verification.

**5.2 Pre-Verification Communication and Submission**

SLCP offers facilities the opportunity to shorten the time necessary for onsite verification by using an offsite document review option. This is a voluntary option and facilities are encouraged to use this if they are able to do so. Please refer to Section 5.3 for more details.

**A. Verifier Communication**

After a verification is scheduled, the Verifier will communicate the following information to the facility:

1. A list of documents required for both offsite validation and/or onsite verification
2. The expectation that onsite verification requires access to all areas of the facility and its grounds, taking of photographs (respecting and avoiding proprietary information) and confidential interviews between the Verifier and employees and management, and that union and/or worker representatives will be interviewed at the start of or during the verification process.
3. Statement on the need for senior management and employees’ representatives to be present at the opening and closing meeting
4. Names of Verifiers and their contact details (telephone number and email)
5. Number of days required to complete the verification
6. Explanation that any additional data the facility would like to provide to support the verification must be provided prior to the Pre-closing meeting<sup>1</sup>
7. Link to online information about the SLCP verification process
8. SLCP policy on ethical conduct
9. The dispute mechanism to report any issues relating to the quality of the verification, the attitude of the Verifier and any unethical practices that may occur during the verification

Every verification shall have a verification plan. The verification plan shall be sent to the facility at least one week prior to the verification timeframe and will include a letter of notification with the following information:

- Estimated schedule for the assessment based on the suggested days on site section in 5.3.
- Expectations for the opening meeting; who should be in attendance (see above “Verifier Communication – item iii)
- Document Request List – Localized list to be provided by Verifier/Verifier Body organization
- Expectation for photographs – Guidance provided in section on Photo Reports
- Expectation for interviews of management and employees – Guidance provided in section on interviews
- SLCP policy on ethical conduct – See Appendix

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<sup>1</sup> Exceptions to this rule are permitted for exigencies such as non-access to documentation or information due to absence of key management personnel on the days of the verification assessment. Additional fees may apply depending on the scope of work to be completed post verification. Delay of closing the onsite verification process for writing of the draft report can last only up to 2 working days.

**B. Facility Communication**

The facility should make a best effort to submit key requested documents no less than ten working days in advance of the onsite assessment timeframe. The Verifier or Verifier Body must provide the facility with an up-to-date list of required documents when the verification is scheduled. It is the responsibility of the Verifier and their organizations to know which documents are necessary for a particular country, regions or type of facility. Any prior submission will reduce the overall amount of time necessary for the onsite activities. Upon request from the Verifier, facility shall also supply any logistical information required to reach and gain access to the facility on the assessment date.

**5.3 Offsite Review**

The offsite review is conducted in preparation for the onsite verification – it does not replace the activities (such as interviews or walkthrough) that need to be conducted at the site. The offsite review consists of the background check and a review of documents provided by the facility. Verifiers are expected to take between up to four hours (half a day) to eight hours (one day) to complete the offsite review depending on the size and complexity of the facility being verified.

The offsite review offers a voluntary option to reduce the onsite time commitment by facility. It does not necessarily reduce the Verifier's overall verification time, but it can save or reduce facility management time and attention.

**A. Document Review**

The facility determines which of the documents listed in the document checklist provided by the Verifier they feel comfortable submitting for offsite review in advance of the onsite visit. Declining to submit advance documentation shall not prejudice any of the work conducted on site, it may, however, prolong the onsite assessment.

The Verifier must review all documents provided at this stage and carry out further cross checking during the onsite verification. The Verifier must confirm with the facility that all documents have been received and subsequently reviewed before the onsite verification.

During the offsite review, the Verifier ensures that the assessment is complete and identifies any inconsistencies or gaps in the information. The Verifier also gains an understanding of the facility's management systems, documentation and specific conditions or issues such as migrant labor, multiple buildings, dormitories and other relevant facts.

**B. Background Check**

It is the due diligence of each Verifier and the organization to which they belong to obtain relevant background information related to specific conditions within a country and region; ensuring they have up-to-date knowledge. Verifiers should be knowledgeable on basic employment laws such as minimum wage, working hours and social benefits that pertain to the facility location.

Background information required shall include at a minimum a web-based research:

- A search for the facility and local area for any issues or labor unrest that may have occurred in the last two years.

**5.4 Onsite Verification**

As referenced in section 5.1, Onsite verifications in the SLCP will be **announced**.

#### Physical Scope

Each verification will cover the area as defined by the facility in the facility profile and all operations included therein.

#### Verification Length

The table below provides an estimated minimum number of man-days to carry out on site verification work according to the size of the facility. Verifiers are to follow the *guidelines* indicated below on the minimum length requirements for the verification of the assessment data.

This estimate does not account for facilities that either have migrant workers and multiple languages present or that have specialized operations with additional health and safety implications, such as vehicle fleets, water reservoirs or large quantities of hazardous materials. It also does not account for facilities that have mature employee engagement systems, where the Verifier need only review the active feedback processes in the company. These additional variables may result in a different number of workdays for verification.

Number of Employees	Days Onsite
1 - 100	2
101-200	2
201 - 500	3
501 - 1000	3
1001 - 2000	4
2000+	4

#### Opening Meeting

The onsite verification shall start with an opening meeting with facility management, workers' representatives and those individuals responsible for managing recruitment, contracts, wages, and health and safety to discuss objectives, verification scope, and methodology. Agenda will include:

- 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 rectify any inaccurate data.
- Verifiers demonstrating their authorization by SLCP VPM. They shall be professional and impartial in their work and request openness and transparency by the facility. They shall give the facility a copy of the policy on SLCP ethical conduct and the complaint channel contact information.
- Verifier informing management that the employee interviews are confidential and that the employer is prohibited from taking retaliatory action against those who are interviewed.
- All verification information obtained during the process including data and names shall be kept confidential and none will be shared outside the verification team with one exception: data would be made available to the SLCP VPM for quality review or investigation into the work of the Verifiers. Appropriate data will be used in the final report to confirm statements and will not include any personally identifiable information.

- Description of the report methodology and associated timelines for delivery of the draft report, receipt of facility response and the final report.
- Prohibition on Sales: At no time should Verifiers engage in selling consulting or other services by their organization.

Verifiers are encouraged to foster a professional and cooperative environment by focusing on collaboration and mutual trust.

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 that denial in the finalized 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 shall be noted in the report along with any incidences where the Verifier was unable to have pictures they requested.

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

The next three sections detail the primary activities of the Verifier: *document review, walkthrough and interviews*.

#### **Document Review**

Verifiers review documents to understand the infrastructure of the facility's management system and to verify specific claims about how the workforce is managed.

Management systems demonstrate the facility's capacity to understand its situation and drive necessary improvements. An effective management system enables a facility to identify problems internally and to correct them.

The onsite verification will evaluate the accuracy and relevance of the data in the assessment with regards to management systems. Examples of items for review include:

- Policies and standard operating procedures
- Records demonstrating implementation of policies and procedures
- Identification and assessment of risk
- Internal monitoring
- Communications systems
- Complaint management and resolution
- Training and capability building
- Management of suppliers and contractors

The data collected during interviews is 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. 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. 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.

The process for reviewing wages and hours involves selecting three months from the 12-month assessment period to audit a group of employees. The specific months will be determined by the Verifier on site and shall generally represent one month of high production, one month of low production, and either the most recent month or one month at random. The Verifier may extend the sample within the 12-month assessment data period if he or she deems necessary to substantiate their assessment.

### Walkthrough/Onsite Observation

The walkthrough is for visually verifying implementation of policies and procedures and observing workplace health and safety practices. It is recommended to have a worker representative (if applicable and present during the day of verification) accompany the verifier during the walkthrough, along with other facility management/ personnel, as applicable.

#### **Areas of focus**

- 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
- The surrounding demographic conditions (e.g. rural, industrial, residential neighborhood, business district)
- 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)
- Check the roof if possible
- Report 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, dormitory, canteen or kitchen

### Worker Interviews

A critical part of verification is to incorporate employee experiences into an understanding of the validity of assessment data. The interviews are strictly confidential and subsequent reports will not identify the names of interviewees nor their individual responses.

The most important principle for interviews is that the Verifier decides, based on real-time information at the facility, how to amend or expand the sample to achieve the best quality possible. It is essential to understand that general guidelines on sampling (listed below) provide a starting point for the work, but the expertise of the Verifier is critical to tailoring the work to a facility.

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)

When planning for a *representative* sample of employees, the Verifier may consider both the types of contracts and types of people in the workforce. Select persons with these qualities in mind (illustrative only – each facility will vary):

- New hires
- Young employees
- Apprentice/ student employees
- Temporary/ contract employees
- Workers of various nationalities (including migrant employees and foreign contract employees)
- Persons performing hazardous work such as chemical storage & disposal
- Relatively gender-balanced, ensuring representation in the case of a small minority

The table below provides a *minimum* number of interviews for a facility and sampling of personnel files and Wage and Working Hour records. This estimate does not account for facilities that either have migrant workers and multiple languages present or that have specialized operations with additional health and safety implications, such as vehicle fleets, water reservoirs or large quantities of hazardous materials. It also does not account for facilities that have mature employee engagement systems, where the Verifier need only review the active feedback processes in the company. These additional variables may result in a different number of workdays for verification.

**Recommended Sample Size**

Number of Employees	Individual Employee Interviews	Total Interviews (Individual & Group)	Personnel Files	Wage & Hour Records
1 - 100	7	10	10	10
101-200	8	14	15	15
201 - 500	10	18	20	20
501 - 1000	12	22	22	22
1001 - 2000	15	26	26	26
2000+	20	30	30	30

*Time estimate: 20 minutes per individual, 30 minutes per group of 3-4. Excludes time with management.*

*Verification is to take place on consecutive days.*

**Union and worker representative interviews**

Union and worker representative interviews are to be interviewed at the start of or during the verification process.

It is important to interview trade union and/or worker representatives, where they exist, to explore their view of working conditions, management attitude as well as any specific issues. It is recommended that the Verifier speak with a worker representative – elected or not (these persons could be trade union rep or elected through internal system, or appointed by the facility) or equivalent at the start of the verification process. If the union is independent of the employer, this interview can be an important source of leads on other issues in the facility across the clusters.

During the opening meeting, Verifiers should 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 there are union/ worker representatives serving committees, they must also be included in the interviews. 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, etc. Verifiers need to be very clear that the group meeting should not involve management/ office staff even if they are union members/ representatives.

Union/ worker representatives can also help to organize worker interviews, but Verifiers should also

choose some workers who are not suggested by the union. Union and/or worker representatives can be interviewed in groups, but it is critical to ensure that all participants have an opportunity to speak and not just one or two dominant speakers. In most cases, it is advisable to do some individual as well as group interviews.

### **Interview Process**

- Discussions should take place in a quiet, private area away from management offices with no representatives of management present.
- Informal discussions may 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 process 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 is not reportable; but it may indicate an opportunity to expand the interview sample.
- Interviews should take place in a language understood by workers. Languages are listed in the facility profile section of the assessment.
- Special note on languages:
  - The 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.
  - The first recourse is to organize a verification team with multi-language capacity. This team should be able to communicate with both management and employees in a language that each part understands.
  - The second recourse is to use professional translation services where necessary. This must take place on site. It is important 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. This is particularly relevant in regions with migrant and foreign contract employees.
  - Translators, if used, must be present on site.
  - In cases where interpreter cost or lack of qualified interpreters is an issue, the Verifier may appeal to the VPM for permission to verify with less than a full range of worker interviews.
  - Verifier should specially note information contained in the facility profile which may indicate the existence of vulnerable groups within the facility. In such cases, there ought to be an attempt to speak to these groups.

### **Employee Concerns**

Verifiers should ensure that problems raised by employees are discussed with management in a non-attributed way. Verifiers must ensure that the comments they report cannot be traced back to an individual worker.

The Verifier should also keep a confidential record of those with whom they have had interviews.

### **Photo report**

The report should include photos of the facility. Photographs should only be taken with the permission of the facility as they may contain confidential information:

- 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: 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 where these can be photographed

### Pre-Closing Meeting

Before the closing meeting, Verifier must:

- Cross-check all collected data
- Prepare explanations and justifications
  - Outline the differences between the data found in the assessment and the data discovered by the Verifier
  - Prepare photographs if required for evidence

### Closing Meeting

The closing meeting should be held with facility management, union/ worker representatives (if there are any) as well as guests invited by the manufacturer. These could, for example, be brands, retailers, other manufacturers and NGOs. Ideally this will encompass the same personnel who were present at the opening meeting. During the meeting, the Verifier reviews the scope of the work performed. It is an opportunity for the Verifier to highlight any discrepancies between the assessment and the verification findings so that a facility can understand how to better complete the Convergence 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.

The closing meeting agenda should include, but is not limited to, the following:

- Cooperation of staff and availability of information
- Confidentiality of the results
- Corrected assessment data from the Verifier and acknowledgement from the facility on the verified data collected
- Informing facility that the draft, locked verified assessment report will be delivered within ten working days of the verification, calculated from the final day on site
- Thanking the facility management

After the closing meeting, Verifiers shall obtain a signature of acknowledgment as necessary and required (e.g. for the Verifier Log) from the facility’s representative. During the pilot, should the facility disagree with any information, they can reach out to the SLCP secretariat directly.

## 6. Reporting

TOOL/DOCUMENT AVAILABLE
SLCP Data Collection & Verification tool- verifier tabs

### Report Writing

The goal of verification is to verify the completeness and correctness of data gathered during the assessment process. The Verifier is to ensure that the correct information is provided in the tool in the verification columns for each section and also for the Verification Report tab. Further information will be provided during training sessions. The report (completed Excel file) will consist therefore of three elements:

1. For each of the questions throughout the sections in the Data Collection & Verification tool the verifier must select from an option of Accurate/ Inaccurate/ Incomplete and if relevant enter the corrected response and supporting comments
2. Verifier general report on the Verification Report tab
3. Auto generated recap tab on in completed questions (index) and inaccurate responses (index and overview of inaccurate responses)

The purpose of each report is to provide to clients of the facility the correct information alongside the initial information gathered during the assessment process. With this information users (manufacturer HQ, brands/ retailers, Standard holders and other organizations) together with the facility determine compliance levels (based on their own judgement) and can make important decisions about how to improve conditions. Therefore, it is critical that all reports are accurate, detailed, clear and on time. Even if the verification is conducted perfectly, without a good report the information gathered is of little use to the client.

This section provides guidance to help better define SLCP's expectations for reporting and to provide an explanation of the SLCP reporting templates.

- Verifiers shall provide evidence for discrepancies between the assessment data and corrected/ validated data.
- All queries from the facility must be addressed by the Verifier onsite before they leave. Once the Verifier leaves the facility there should only be additions to the verified assessment tool under special circumstances. Special circumstances include non-access to documentation or information due to absence of key management personnel on the days of the verification assessment. Additional fees may apply depending on the scope of work to be completed post onsite verification. Delay of closing the verification process for writing of the draft report can last only up to 2 working days.
- Verification reports must be available in English and should not contain employee names or any personally identifiable information for reasons of confidentiality.
- The Verifier will finalize the report and deliver it to the facility and upload to relevant systems within ten working days of completing the onsite verification. The final verified assessment report is to be in a locked Excel format.

### General Reporting Expectations

Generally, for all reports, Verifiers should follow each of these key requirements:

1. 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. Keep these on file for future reference unless instructed otherwise.
2. Never provide reference to confidential employee interviews.
3. Issue additional correct information against local legal references.

4. Submit reports within the required time frame.
5. Provide information in all fields or “N/A” if not applicable, no fields should be left blank.
6. Use correct spelling, consistent fonts and correct grammar.

**Finalizing the Report**

During the closing meeting, the Verifier will have the chance to explain any changes in the response written by the facility during the initial assessment. To finalize the report, the Verifier will provide some qualitative information in the final tab called Verifier Tab that could include but is not limited to:

- Cooperativeness of facility
- Brief description of the site covered
- Strengths of management practices
- Any other comment

**Document Retention**

Verifiers should follow local legal requirements relating to the minimum retention of notes, documents, photograph report and/or client files. SLCP requests at least 12 months of retention for purposes of the complaints procedure and appeals procedure.

PROTOTO

## Appendix I

### Verifier Expectations

SLCP considers all Verifiers to be representatives of SLCP when engaging with manufacturers. Any sign of bias, favoritism and/or wrongdoing on the part of SLCP, even if perceived, could compromise the validity of the verification process. Our expectation is 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.

### Scope of Worker Coverage

Verifiers should cover all Production workers that are employees, including:

- Part-time,
- Short-term (a person with a labor contract of limited or unspecified duration with no guarantee of continuation),
- Temporary Employees (e.g. labor supplied by a third-party employment agency).

In the event that the Verifier suspects potential issues among employees in the facility office, this should be raised in the comment section of the Assessment Tool. Verifiers should also check third party service providers/ suppliers who work in any area of the facility including food service, security, child care staff, custodial, etc.

### Ethics

Gift Policy 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 by SLCP's Code and SLCP's Anti-Bribery Policy;
2. Take a photo of the item, if possible;
3. Contact the SLCP Representative/ VPM to report the incident and seek further guidance (Based on the SLCP Regional Representative's advice, either abort the assessment or proceed with the verification. If the Verifier feels threatened or intimidated in any way, the verification should be aborted).

### Acceptance of Lunch and Travel

Verifiers must never allow management to take them out for lunch during an assessment 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. If there is a security concern with transportation or, during any other part of the Verification, the Verifier must contact his or her Verifier Body.

### 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 facility and must be maintained strictly confidential. Such confidential information can be shared only within SLCP Verified Assessment Reports and to parties designated by the facility. Verifiers may not e-mail or give hard copies of the Verified Assessment Report to any party other than the facility and the VPM.

### Impartiality

The Verifier must maintain impartiality at all times in carrying out the verification. He or she 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 disclose if they have had any personal or professional affiliation or relationship with the employment site that is subject of the assessment.

**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 process. 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 an assessment 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 should 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 project. 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 should exercise best judgment and should not proceed if he or she feels unsafe.

**Verifying Bodies may 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 o Whenever there is risk of crushing or heavy objects dropping onto feet 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 on areas with the risk of fall hazards
- Provide sufficient employee training, such as hazard communication, as applicable. 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. Noise PPE must be worn to reduce exposure in certain circumstances.
- 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.