

Social & Labor Convergence Project
Converged Assessment.
Collaborative Action.
Improved Working Conditions.

January 2018
Public Consultation Public Report

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- Highlights, Progress

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- Highlights, Responses, Feedback/Comments,

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1. Highlights, Progress

Highlights

- Scope of consultation: proto2 of converged assessment framework:
 1. Data collection tool
 2. Verification protocol
 3. Verifier guidance
- Announcement: Over **200+** external stakeholders contacted to review and provide input
- Proto2 posted on SLCP website, link to on-line survey, recorded kick-off webinar.

Progress

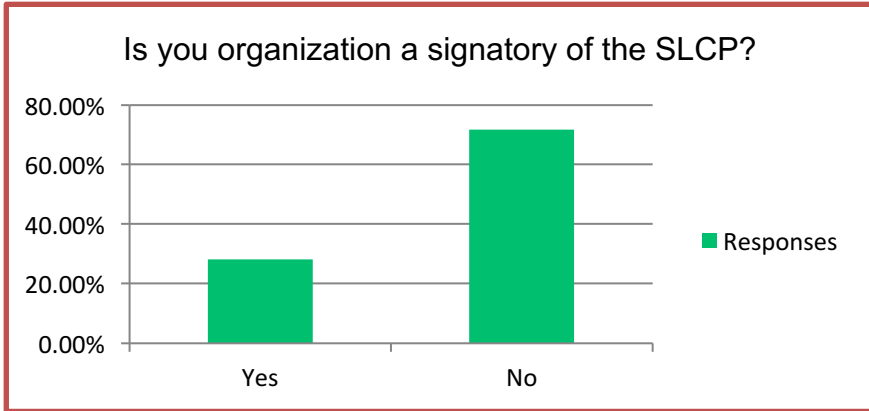
- **Survey:** Nov. 6-Dec. 13 2017, we received **26 completed responses** with actual feedback.
- **Follow up:** January 2018: **phone calls/meetings** with some organizations and **in-person meeting Paris, 37 participants.**



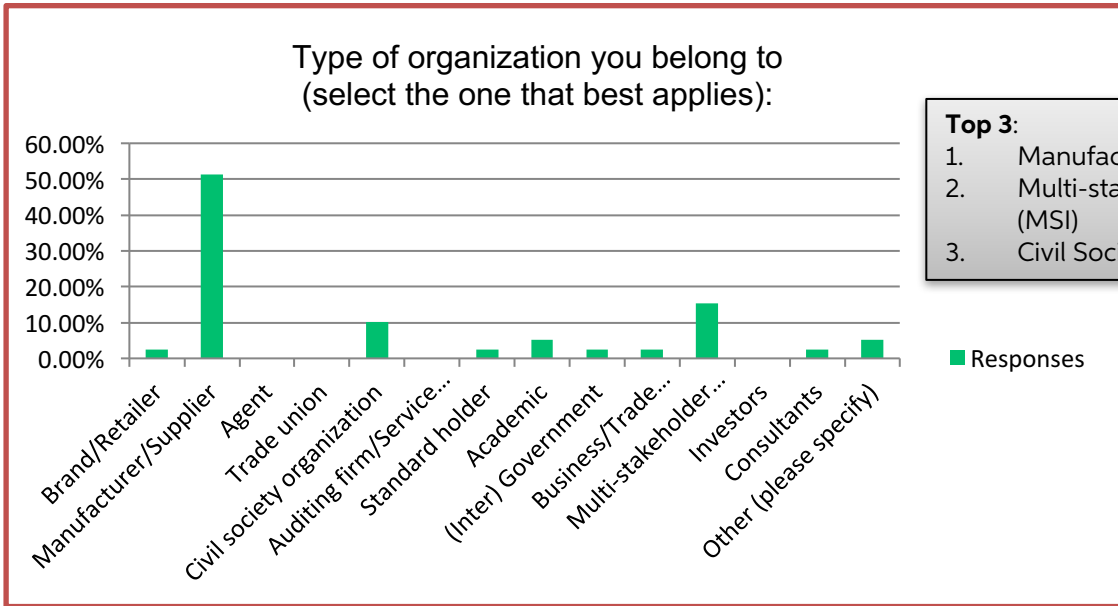
2. Survey Overview

Survey Overview:

26 completed responses



72% Answered "No"

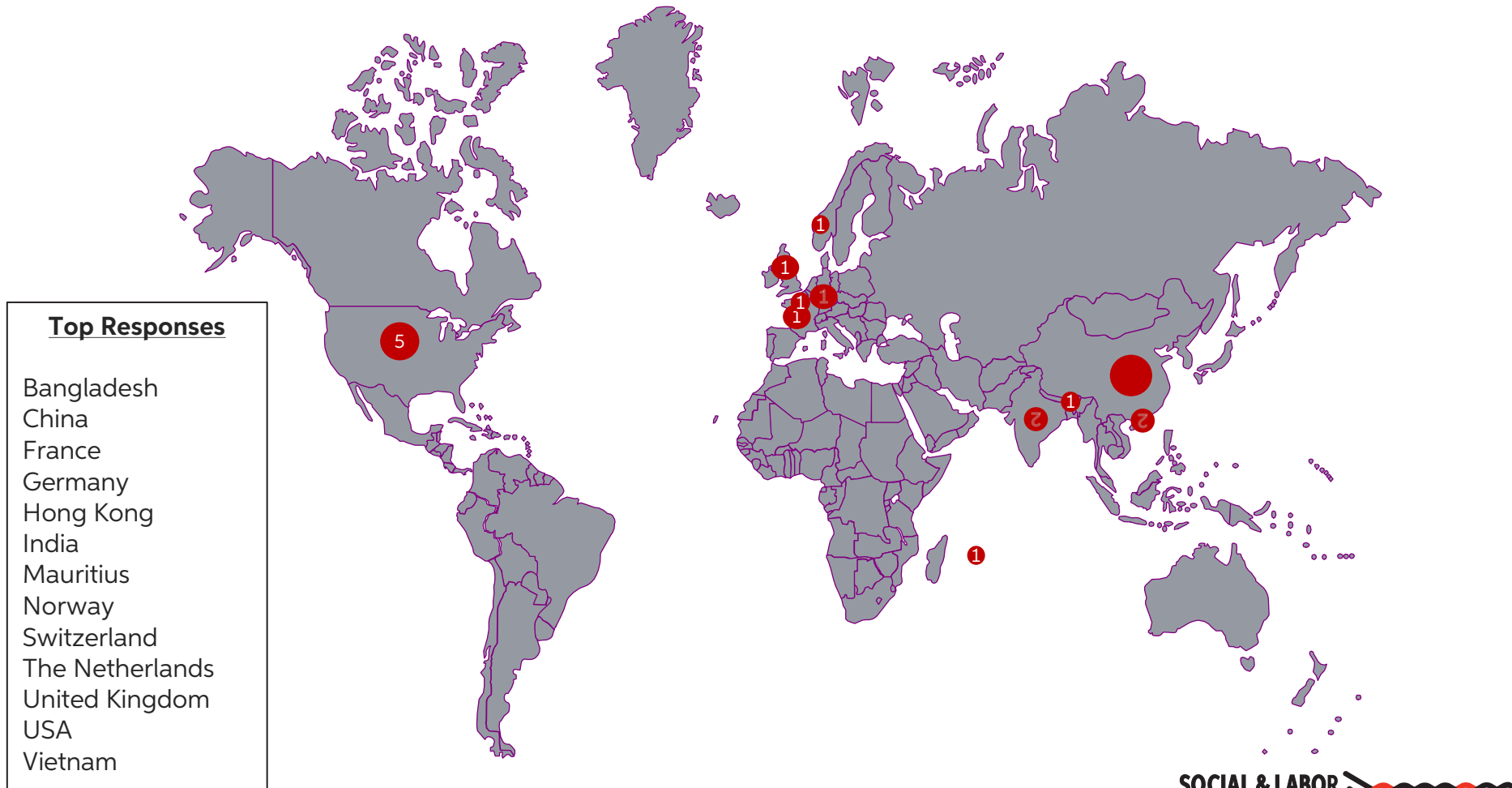


Top 3:

1. Manufacturer/Supplier
2. Multi-stakeholder Initiative (MSI)
3. Civil Society Org.

Geographic Coverage of Respondents

Survey Question: "Which country are you located in?"

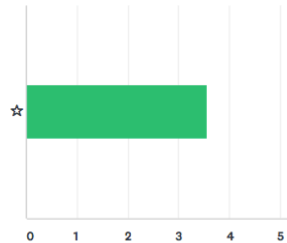


Survey Overview:

Highlights + Responses: satisfaction level

Q8 Please rate your overall satisfaction with the content/questions in the Data Collection and Verification Tool - Prototype 2 (Excel file) from a scale of 1-5 (5 being "Very Satisfied"; 1 being "Very Dissatisfied")

Answered: 22 Skipped: 17



Weighted Average:
3.6/5 Rating

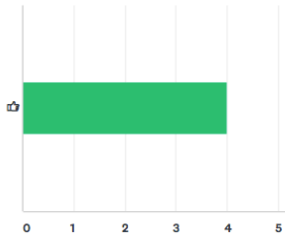
	VERY DISSATISFIED	(NO LABEL)	(NO LABEL)	(NO LABEL)	VERY SATISFIED	TOTAL	WEIGHTED AVERAGE
☆	4.55%	9.09%	36.36%	27.27%	22.73%	22	3.55
	1	2	8	6	5		

Three elements of Converged assessment framework:

1. Data collection & verification tool
2. Verification protocol
3. Verifier Guidance

Q23 Please rate your overall satisfaction with the content of the verification protocol:

Answered: 18 Skipped: 20

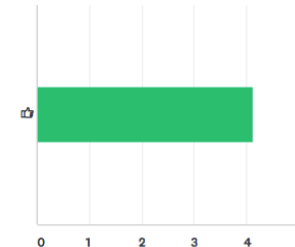


Weighted Average:
4.0/5 Rating

	VERY DISSATISFIED	SOMEWHAT DISSATISFIED	NEITHER SATISFIED NOR DISSATISFIED	SOMEWHAT SATISFIED	VERY SATISFIED	TOTAL	WEIGHTED AVERAGE
👍	0.00%	5.56%	22.22%	38.89%	33.33%	18	4.00
	0	1	4	7	6		

Q36 Please rate your overall satisfaction with the content in the verifier guidance:

Answered: 15 Skipped: 23

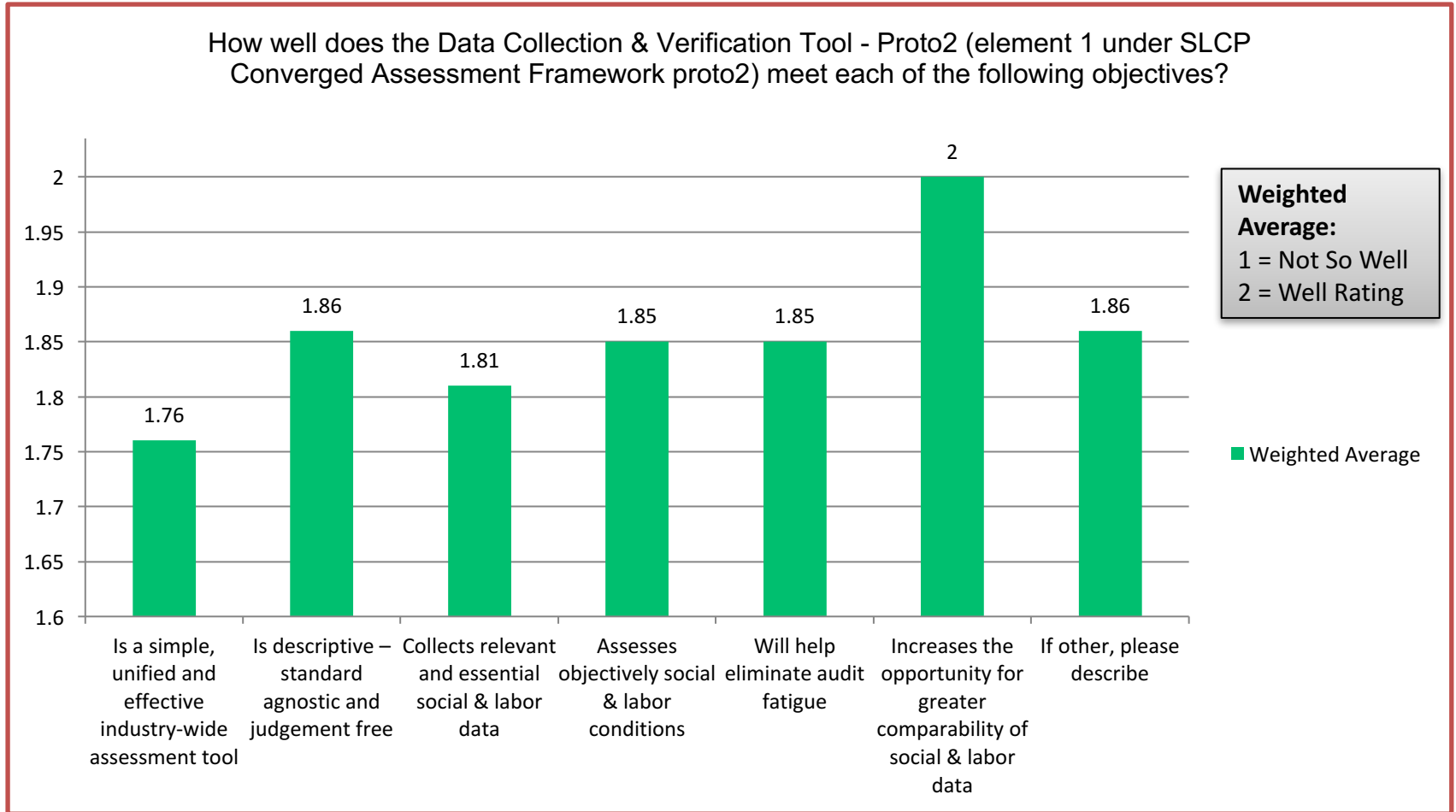


Weighted Average:
4.1/5 Rating

	VERY DISSATISFIED	SOMEWHAT DISSATISFIED	NEITHER SATISFIED NOR DISSATISFIED	SOMEWHAT SATISFIED	VERY SATISFIED	TOTAL	WEIGHTED AVERAGE
👍	0.00%	0.00%	26.67%	33.33%	40.00%	15	4.13
	0	0	4	5	6		

Survey Overview:

Highlights + Responses: project objectives



Post Consultation Activities

In-depth Phone Interviews

JANUARY 4 – JANUARY 20

In-depth Stakeholder Phone Interview

Current list of invitees:

- Around 10 stakeholder organizations shortlisted to be contacted along with a select group of 'high priority' contacts
- Organizations identified with input from SLCP signatories and Public Consultation Committee

Purpose:

In depth interviews are intended to help provide further feedback and one-on-one discussions with key stakeholders to further explain SLCP vision and rationale for certain points in proto2 and inform next version of framework.

Next Steps:

- Suggestion was made to analyze Public Consultation survey results first, and based on participants, identify those stakeholders to engage with by phone.
- Interviews being conducted month of January 2018 and expected to run through to Jan end.

Post Survey Activities

In-person Stakeholder Meeting

JANUARY 29

In-person Stakeholder Meeting

Paris, France

Current list of invitees:

- Around 37 attendees - mix of business and civil society
- Organizations identified with input from SLCP signatories and Public Consultation Committee
- Lively and constructive discussions.
- Walk through key emerging issues and input received from stakeholders on need for SLCP to address these (or not) in proto3, strategic plan 2019 and beyond or through partnership with other organization(s)

Purpose:

Dialogue with stakeholders to report back on findings consultation and discuss direction for proto3. Additionally gather initial input for 5Y strategic plan.

Status:

- January 29, 2018 at OECD Chateau in Paris

Outcomes survey and dialogue:

Feedback/Comments

[Re: driving buy-in]

“More clarity is needed on how this audit will meet each of the different signatory requirements such that they can accept it at face value without further audits on their own. All U.S. retailers have audits that currently score factories with corrective measures if the factory scores too low.”

-**Manufacturer/Supplier**

“[...] It would be reasonable – and necessary - for the SLCP to include responsible **purchasing practices** in its tool and methodology as well as link the assessment results to the business behaviour of the brands. [...]” –

- **Multi-stakeholder Initiative**

“ Well drafted document”

-**Manufacturer/Supplier**

“ **Worker engagement** is not sufficiently addressed [in tool]”

- **Civil Society Organization**

“The tool (**excel file**) is **excellent**. Although it is a very lengthy questionnaire, it gives quite a lot of information to factory management. This encourage factory management to start the thinking process towards change. Our main suggestion to you is to include questions that address root- causes especially at brand level.“

- **Multi-stakeholder Initiative**

“More reference should be provided to **international standards and conventions** (e.g. ILO and UN conventions)”

- **(Inter) Government**



3. Key emerging issues

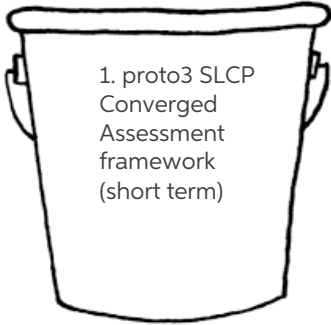
Outcomes and Key Emerging Issues

General tone of the feedback is positive. Components highlighted include: well drafted, comprehensive, facility ownership&accountability

Key emerging issues:

1. Tool-Detail level tool questions/data
2. Verification: Workers' consultation/representation
3. Tool/Verification: alignment with OECD Guidance
4. Purchasing practices to be referred/included in SLCP (future)
5. Transparency of SLCP data collected
6. Remediation referred/included in SLCP (future)

See details next slides. For each of these items **SLCP would consider categorizing them into one of the following 'buckets' or keep them out of scope.** The discussions with stakeholders have helped the SLCP Project Management Team and Steering Committee to understand priorities and will feed into the decisions to be taking in the months February – August 2018.



Key Emerging Issues

1. Detail Level Tool Questions/Data

Illustrative feedback received:

*We have identified some areas where the SLCP would not provide sufficient data to assess companies against our standard, including compensation data required to measure workers' pay against living- wage and other benchmarks. – **Multi-stakeholder Organization/Standard holder***

We reviewed the tool to assess whether it covered the our Priority Industry Principles against forced labour:

- *Every worker should have freedom of movement*
- *No worker should pay for a job*
- *No worker should be indebted or coerced to work*

*Based upon the coverage of these elements, suggestions have been provided to ensure optimal data collection against forced labour. – **Multi-stakeholder Organization***

*“The tool does not collect data on the exact amount of wages being paid. [...] Do the companies endorse the payment of living wages? Do they agree that factories should pay living wages? Or it is enough if the factories pay minimum wages?” – **Civil Society Organization***

Feedback will be taken into account for proto3 development (Feb+March 2018)

Key Emerging Issues

2. Verification - Workers' Consultation/Representation

Illustrative feedback received:

"[...] Proto 2 is not covering well labor issues and workers representation role is very brief (FoA part is negligible, verification attempt is not sufficient). [...]" - **Multi-stakeholder Organization**

"[...]The sample sizes are not sufficient , lower than SMETA [...]" – **Global Not-for-profit**

"Worker interviews should ensure adequate involvement of women perspectives, especially vulnerable groups such as pregnant and nursing women." – **International Organization**

"Inclusion of Worker Representatives/Engagement: [...] There are no questions evaluating the facility's compliance with the CBA in practice. We recommend the inclusion of questions highlighted in the appended Survey below to close this gap." – **Multi-stakeholder Organization**

Feedback will be taken into account for proto3 development (Feb+March 2018)

Key Emerging Issues

3. Alignment OECD Guidance

Illustrative feedback received:

What are the differences/gaps with the OECD due diligence? Not all steps seem to have been covered. [see points 4-6]. **NGO**

Important to have a tool that can help mitigate and remediate issues. The French government has included OECD guidelines in a law for companies. Law asks companies to publish a due diligence plan and an action plan. Understands that SLCP has limitations: consider expanding the scope.– **Government**

Clarification SLCP scoping: 3 out of 6 due diligence process are within scope of SLCP. Those that are have been built based on recommendations from OECD Guidance. Feedback will be taken into account in proto3 (Feb+March 2018). We will do another check on alignment OECD guidance. Current ‘out-of-scope elements, see point 4-6 key emerging issues.

Key Emerging Issues

4. Purchasing Practices

Illustrative feedback received:

[...] It is also essential to gather data on brands purchasing practices as this is directly linked to working conditions at factory level(...) the direct effect of buyers' purchasing practices on working conditions at factory level should not be ignored when looking into assessment results, improvements plans and remediation responsibilities.[...]" – MSI/Standards Holder

"[SLCP] does not include the responsibility of the brands. It is quite difficult to build mutual trust, when the tool only measures the performance of the factory without looking at the enabling factors, which heavily rely on brands' performances." – NGO

"In our view including questions on customers/brands purchasing practices is key to make the suggested tool more than a twist to traditional audit protocol." – MSI/Standards Holder

"some reference/content needed on purchasing practices in the short term. What is already there: look with whom you can collaborate on this. What do you do with the data: second part could be work of other organizations. Data collection on a manufacturers level is already possible with this tool. - MSI/Standards Holder

Feedback will be taken into account in strategic planning process (March-August 2019) SLCP 5Y plan 2019 and beyond referring/partnership with other organizations.

Will consider including facility level question on buyer practices in tool (Feb+March 2018).

Key Emerging Issues

5. Transparency

Illustrative feedback received:

*“[...] I understand that SL Convergence has no transparency built into its program or plans. Without transparency to external stakeholders, there is no true credibility.”[...] – **Academic Institution***

*“[...] Transparency is a key ingredient in promoting accountability.[...] We strongly urge the SLCP to consider making its data available to the public, or at a minimum, to us and other MSIs that can measure and evaluate it against concrete labor standards.” – **Multi-stakeholder Organization***

*Manufacturers will not subscribe to the tool if all data is just being scared. Singling out a factory is a problem, aggregated data not. – **Industry Association***

Feedback will be taken into account in strategic planning process (March-August 2019) SLCP 5Y plan 2019 and beyond as well as for options of referring/partnership with other organizations.

Key Emerging Issues

5. Remediation

Illustrative feedback received:

We are all here because conditions need to improve. When you have the picture you should also commit to improving the situation/picture. Having the picture alone is not useful. Need to think about solutions. –

Governmental organization

Remediation should be out from an objective point of view. Measurement is different from coming to an opinion about it. –

Civil society organization

Remediation is more a market question. How far a brand decides on going is part of their USP. –

Industry Association

*Remediation should not be in the scope of SLCP per se, but we can have a vision about who will use the data and for what. We need to think about users and how information is shared. SLCP should not lead to duplications in remediation. Shared remediation is important. **Intergovernmental organization***

Feedback will be taken into account in strategic planning process (March-August 2019) SLCP 5Y plan 2019 and beyond referring/partnership with other organizations.



Thank you!

For any additional comments or questions for the SLCP
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sponsors:



C&A Foundation

co-sponsors:

