



Objectives



Provide stakeholders with an overview of the SLCP Verification Oversight & Quality Assurance strategy



Highlight recent & upcoming strategy developments that strengthen SLCP data quality & integrity



Share insights from VO & QA processes and findings



Signpost stakeholders to further information & resources



SLCP strategy for:

Verification Oversight & Quality Assurance

Goal:

Build trust in and credibility of SLCP and its data through comprehensive and rigorous processes that improve precision, consistency and integrity of SLCP verifications over time, resulting in quality verified data.



Continuous Improvement

Feedback and partnerships



Process Oversight

Assessing performance, quality and integrity of verification process



Personnel

Establishing & maintaining qualified Verifier Bodies and Verifiers

Verification Oversight Organization (VOO)

Overarching body responsible for ensuring integrity of SLCP verification and quality of verified assessment data.

Personnel

- ✓ <u>Verifier</u> and <u>Verifier Body</u> (VB) qualification requirements
- Entrance exam and elearning trainings for Verifiers
- ✓ Quality Assurance Manual
- ✓ VB Terms of Use
- ✓ Written <u>VB Requirements</u>
- Qualification process and regularication
- ✓ VB systems check
- ✓ Non-APSCA VB systems special Check

Process Oversight

- √ VOO activities <u>onsite and offsite</u>
- ✓ VB scoring
- Quarterly Calibration
 Webinars
- ✓ Integrity Oversight Program
- ✓ Transparent Communication of Oversight Data via <u>public</u> QA site
- ✓ Ongoing support to Verifiers/ VBs with <u>Helpdesk</u> and online <u>Q&A</u> Knowledgebase

Continuous Improvement

- ✓ Stakeholder QA program
- ✓ Feedback Mechanisms
- ✓ APSCA Collaboration
- ✓ Transparent Communication (public QA site)
- Verification Oversight
 Technical Advisory Committee





Personnel



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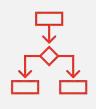
Approval of Verifier Bodies & Verifiers





Process:

- VBs and Verifiers must meet eligibility criteria.
- Verifiers must take elearning and pass an exam



Verifier Applications in 2021

+/- 62% success rate





Clearer VB & Verifier Responsibilities

Updates to:

- VB Terms of Use
- QA Manual
- VB Requirements Document

Better documentation of:

- Qualification process
- How to maintain qualifications







Greater alignment with APSCA

In 2021, SLCP and APSCA signed a 3-year collaboration agreement on Verifier/Verifier Body quality.

Streamlined application process:

- APSCA/Non-APSCA differentiation for VB onboarding (Provisional Status)
- Non-APSCA members need to go through additional (paid) VB management check
- APSCA certification equivalency for Verifier application approvals
- APSCA certification equivalency for maintaining SLCP approved Verifier status year over year. SLCP process aligned with APSCA Continuous Professional Development (CPD) requirements

Benefit for SLCP:

Aligning with existing frameworks for audit body & auditor integrity





Greater alignment with APSCA

Additionally:

- APSCA status published on <u>VB public list site</u>
- As per Verifier Body Terms Of Use, SLCP permitted to communicate findings of ethics and integrity investigations to APSCA

APSCA & SLCP in 2021

- 51% of Verifier Bodies are APSCA members
- 85% of verified assessments were conducted by APSCA members



Building on Success



Vision

Members are trusted professionals in Social Compliance Auditing



Mission

To increase the value and effectiveness of independent social compliance audits by enhancing the professionalism, consistency and credibility of individuals and organizations perform them





The APSCA Journey



Executive Director Formation of:

- · Executive Board
- Working Groups to develop Code and Competency Framework
- 1st AGM

- APSCA Incorporated in USA
- Auditor Exam Pilot in Chinese
- Launch Audit Firm Application
- Launched first Part of three Part exam in Englis

- · Launch final part of exam in 4 languages
- · First Audit Firm Ethic Committee meeting





2016

2017

2018

2019

2020

102

2002-15



Formation of

2015

- · APSCA
- · Stakeholder Board
- Adopted Code of Conduct, Competency Framework
- · Enrol Auditors
- Auditor Exam Piloted in English
- · Launched first two parts of three-part exam in 3 additional languages
- · Pilot Part III in 4 Languages
- Adopted Code & Standards
- First Ethics Board Meeting
- 42 Certified Auditors

- Launch first two parts in six new languages
- · 1,200 Certified Auditors



APSCA - Today



102 COUNTRIES 55

FIRMS





OVER
4,700
AUDITORS

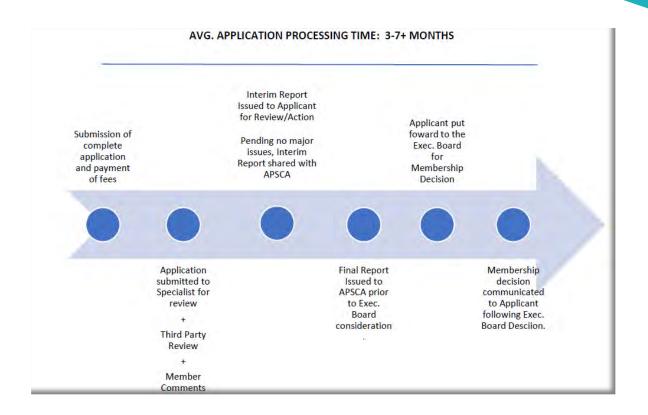
More than

1,350+

CSCA's

Becoming a Member Firm







Becoming a Member Auditor



Registering with APSCA

Part I Exam

Auditor must work for APSCA Member Firm to enrol

Part II
Exam

ASCA works on Audit teams

Part III Exam

Don't be scared-be prepared

CSCA leads Audit teams



Membership Reporting



Quarterly
Reports on
Audits
conducted by
Member Firms





FIRMS







Ethics Team Overview and Workflow

- 1. Process Allegations/Complaints
- 2. Assess Allegations:
 - ✓ Are they credible?
 - Are they within our scope?
 - ✓ Do they violate the APSCA Code & Standards of Professional Conduct?
- 3. Following up, we may:
 - Ask Member Firms to investigate and provide us with an investigation report.
 - ✓ Follow up with subjects of the allegation and other parties involved, and request additional information.
 - ✓ Facilitate a third party investigation, if needed.
- 4. Present case to Disciplinary Board for Member Auditors (DBMA)
- 5. Communicate DBMA decisions to relevant parties.



SOCIAL COMPLIANCE AUDITORS



Improved comms on Verifier capacity

Public list of Verifier Bodies



SLCP Active Verifier Body (VB) List

Welcome to the SLCP Verifier Bodies List!

The table below can be used to quickly scan the active SLCP Verifier Body (VB) list. Use the search field to look for a specific country or name.

Countries/ regions included in overview: Note that the table shows availability of Verifers in countries/regions both where SLCP is currently active and where SLCP will be active. Therefore, viewing a country/region on this list does not mean that verification can be completed for facilities located there. For the up-to-date list of SLCP country/region activity, please visit the Gateway homepage.

Facilities can use this table to understand which VBs are active in their country/legion. The list includes the contact details for each VB. Before selecting a VB for a verification, a facility should contact them to understand costs and availability. After choosing a VB, the facility can select them from a list on their Accredited Host platform. See the SLCP FAQ's for facilities for more details.

Facilities note languages spoken in your facility: In your Gateway profile, you need to include all languages that are spoken in your facility, i.e. any languages spoken by facility management and employees. Languages are selected from a standardized list. This language information is used to match you with a Verifier that has the appropriate language skills to conduct the management and employee interviews. Make sure that one of the languages in the final column of the table below matches one language spoken in your facility before contacting a VB for a quote.

Facilities note selecting Verifier Body: Please be aware that the list below shows "APSCA Status" and "Approval Status". To better understand APSCA Status, please go to the APSCA website here: https://www.theapsca.org/apsca-member-firms/ Approval statuses have the following meanings:

• Full: The VB is either 1) An APSCA full member or 2) non-APSCA member that has completed the VB. Check from the VOO and has

To see additional info on Verifier numbers by location

Chart of Verifiers by Country and VB

If you don't see a VB with approved Verifiers in your country/region, click here to view a list of VB that are approved for additional countries/regions but don't yet have Verifiers. You can contact them to check when Verifiers might be available

VBs Approved for Countries but No Verifiers

You can view a list of countries/regions with local Verifier capacity risks by clicking this button

View Local Verifier Capacity Risk

If you know the family/last name of a Verifier and the Gateway ID you can check approval status here

Check Verifier Status



Improved comms on Verifier capacity

Functionality to check the local Verifier capacity risk

Risk Level (Local Verifiers)

Level 1 Risk (No Local Verifiers, No Pipeline, No VB)

Level 2 Risk (No Local Verifiers, No Pipeline)

Level 3 Risk - No Local Verifiers

Level 4 Risk (High Ratio)

Level 5 Risk (Within Target)

Level 6 Risk (Risk of Over Capacity)





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Check Verifier status





What's coming next?

Q3/Q4

Piloting Mandatory Verifier and Verifier Body Admin Training

- Identification of training topics and potential low cost or cost-free training courses and training partners
- Potential topics include identification of discrimination/ harassment, identification of forced labor, root cause analysis for VB admins to respond to VOO-issued Corrective Action Requests, collective bargaining and freedom of association in China, triangulation of findings and proper Verification Data narrative

Q2/Q3

Preparation for Full Virtual Verification with launch of v1.5

- Update to Verification Protocol and Verifier Guidance especially with inclusion of worker engagement technology (WE Tech) in the full virtual verification process
- Training for Verifiers and VB admins on requirements for execution of Full Virtual Verifications





Process Oversight



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Continuous Improvement

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- VOO activities <u>onsite and</u> offsite
- ✓ VB scoring
- Quarterly Calibration Webinars
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- Transparent Communication of Oversight Data via <u>public</u>
 <u>QA site</u>
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Continuous Improvement

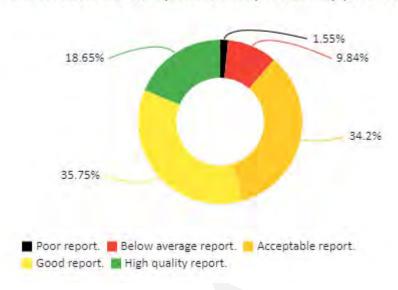
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Outcomes of 2021 QA activities

Desktop Reviews

Distribution of Desktop Reviews Report Quality (Last Year)



89% of reports reviewed were found to be of sufficient quality (ranging from acceptable to high quality)

Up from 88% in 2020 & 76% in 2019.

Desktop Reviews 2021 Ops:

Average of **6.55** 'mistakes' found per report, down from 7.9 in 2020 and 13 in 2019

(SLCP report on average contains approx. 1500 data points)

What happens if a report is found to be insufficient in quality?

- Corrective Action Request (CAR) issued to VB
- Feeds in to VB scores
- Significant issues result in report invalidation



Outcomes of 2021 QA activities

Shadow, Counter and Duplicate Verifications

Duplicate

Duplicate Verification Findings	2020	2021
Max Variance	18%	26%
Average Variance	14%	13%

Main issues found:

- Verifier has different interpretation of laws and application
- Differing degrees of knowledge and experience between Verifiers

Process: Two VBs conduct a duplicate verification to insure consistency

Shadow



Main issues in areas of:

- Time Management
- Procedure (e.g., explaining SLCP transparency; union/ worker rep meeting before closing meeting

Process: VOO representative joins an on-site verification as an observer

Counter



Main issues found:

 Missing H&S issues during verification

Process: Onsite one-day verification conducted by VOO to conduct QA of key report aspects



Process Oversight Activities



Corrective Action Requests (CAR) Issued

126

VB Receiving CARs

36

CAR to Verification Ratio

3%

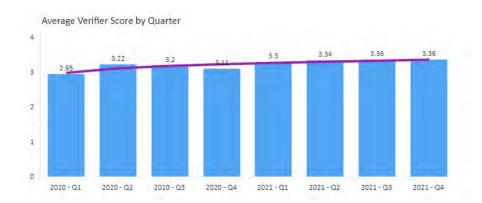


New

Integrity Oversight Program

Context:

- Individual Verifier performance is scored on a range of criteria including exam scores & QA outcomes
- Verifier scores feed into overall VB score, along with results of VB Management Checks



Integrity Oversight Program

Based on the distribution of VB scores, the VOO determines a risk scale:

- Level 3 Risk (highest risk)
- Level 2 Risk
- Level 1 Risk (lowest risk)
- VBs are assessed against the risk scale and assigned a risk-rating based on their overall VB performance score.
- Depending on the rating, a series of outlined actions take place, including mandatory additional QA activities paid for by the VB.
- VBs will be suspended if they receive a level 3 risk status more than twice



New

QA Manual updates on bribery reporting



Bribery reporting enhanced

- Non-public communication
 - Via notes from VOO in Facility Profile on the Gateway only visible to subsequent VB
- Communication in the Gateway verified assessment report
 - Data visible to anyone with access to the report
 - VOO adds notes about the bribery incidence to the Assessment Information page of the Gateway report template; note identified as 'Verification Oversight Organization Alert'



What's coming next?

Launch of form for Verifiers and VBs to report suspicions and unsubstantiated findings that VOO can attach to the facility profile as applicable to inform the next selected/ assigned VB

Starting to mine data to inform more efficient and streamlined selection of reports for desktop and onsite QA

How to further increase **transparency of VB performance**. Current measures include:

- Currently show Integrity Oversight Program outcomes on Verifier Body public page (probation status indicated, if applicable)
- Public dashboard shows average score of Verifiers and VBs



How to further encourage **honest data** from facilities in the self/joint-assessment. Current measures include:

- Signatories commit to honest data in the signatory charter
- Users of the CAF sign ToU committing to provide honest data







Continuous Improvement



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Continuous Improvement

- Stakeholder QA programFeedback MechanismsAPSCA Collaboration
- Transparent Communication (public QA site)
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Continuous Improvement stats

Percentage of facility surveys with positive feedback:

2021:

63%

2020:

57%

Percentage of postverification Verifier surveys with positive feedback: 2021:

89%

2020:

90%



New

Stakeholder QA Program

The Stakeholder QA Program allows the Verification Oversight Organization (VOO) to use QA data gathered by brands and other stakeholders. There are 3 ways that data can be shared:

Ad Hoc Feedback

Sharing ad hoc feedback with the VOO

Conduct Shadow Verifications

Conducting a shadow verification and sharing the report with the VOO

Standardized Data Review

Data in a standard digital format is shared with the VOO



What's new: Updated communications on feedback mechanisms



• Feedback on a specific Verified Assessment Report



• Form for complaints concerning verification



• Contact slcp@sumerra.com directly regarding ethics issue



• Form for complaints concerning SLCP or VOO



Video on how to provide feedback (<u>English</u> | <u>Chinese</u>)



• Find out more on how you can provide feedback here.





Conclusion



2021 Achievements & Learnings

Achievements

- APSCA alignment: Implemented a new •
 (Provisional' status program with enhanced VB checks)
- Implemented a new 'Integrity Program' with escalating discipline for low quality scores
- Piloted a new QA Stakeholder program to get additional quality data from other stakeholder participants
- Onboarded approximately 300 new Verifiers into the program
- Improved transparency/ communication of Verifier capacity
- Added several 'risk' based factors to the VOO process for selection of verifications for QA

Learnings

- There remain many opportunities for improvement in the consistency of verifications
- Opportunity to pilot additional Verifier training options
- As the data grows, there are opportunities to 'mine' this data for trends that can better focus our QA activities.
- Stakeholder QA program is expected to provide new insights into verification quality from stakeholder perspective.



How to find out more

New!

Data Quality & Integrity page on SLCP website with links to information on all areas of the strategy:

https://slconvergence.org/data-quality-integrity

Personnel

Process Oversight

Continuous Improvement

- List of <u>Verifier</u>
 <u>Bodies</u>
- <u>VB Requirements</u>
- QA Manual
- VB Terms of Use

- Public SLCP QA
 Dashboard
- FAQ on <u>Integrity</u>
 <u>Oversight Program</u>

- FAQ on Stakeholder QA Program
- FAQ on <u>providing</u> feedback



Launch of credibility survey



We want to find out what YOU think about SLCP's data quality & integrity.

Please complete our short survey!

We are seeking responses from all individuals – there is no limit on the number of respondents per company/ organization. You do not need to be an SLCP user/ signatory to complete the survey.

