

GoodWeave International

Standard Operating Procedure (SOP) GoodWeave Certification Operations and Personnel Protections during COVID-19 Pandemic

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GoodWeave International

GoodWeave Certification Operations and Personnel Protections during COVID-19 Pandemic

1. PURPOSE

This document seeks to provide guidance on GoodWeave's certification operations during and following COVID-19 shutdowns. It also includes health and safety requirements to protect GoodWeave personnel as GoodWeave transitions back to in-person visits to worksites and worker communities.

2. AUDITS AND INSPECTIONS

2.1 Current Status

To ensure the health and safety of GoodWeave staff and its supplier communities during the COVID-19 pandemic, GoodWeave ceased conducting all audits and inspections.

Thirty days after the suspension of national lockdowns in India and Nepal, GoodWeave will make an assessment on whether in-person visits to worksite can resume, or whether the timeline suspending in-person visits will be extended. See section 5 for requirements on resuming in-person audits and inspections.

2.2 Remote Partial Audits

GoodWeave will begin partial remote audits on June 22, 2020, which will continue until full audits can be conducted in-person at the worksites.

2.2.1 Prioritizing Remote Audits

GoodWeave will prioritize remote audits based on the following criteria:

- Active purchase orders and label requests
- License expiry date
- History of minor and major non-compliances
- New applicant status

2.2.2 Conducting Remote Partial Audits

The inspectors will begin conducting partial annual audits of level 1 facilities remotely through telephone/Skype call with the management. Inspectors will focus on gathering the following:

- Data relevant to the audit checklist that can be re-verified when in-person visits resume,
- Documentation, including production register, wage sheets, attendance, Fire NOC, RCMC validity, Remediation Plan, Child Labor Policy, Pollution Consent, Factory License (where applicable), and any applicable legal documents,
- Production register, to cross check updated supply chain lists,
- Label verification, and
- Declarations that they will not use child labor or forced labor.

2.2.3 Returning to In-Person Audits and Inspections at Worksites

GoodWeave will determine that it is acceptable for its personnel to resume conducting onsite audits and inspections based on the criteria established in section 5.

All in-person visits to worksites must be announced. GoodWeave personnel will also be in touch with personnel at the production site, prior to the visit, to confirm the status of the site and health risks associated with travel.

In-person audits and inspections will initially be scheduled based on the priority criteria established in section 2.2.1.

Audits and inspections will focus on validating information collected during remote audits, and compliance with no child labor and forced labor requirements.

3. TEMPORARY POLICIES FOR LICENSE RENEWALS AND APPLICATIONS

3.1 Certification for Existing Licensees

Existing licensees whose certification expires during GoodWeave's shutdown of operations are granted a temporary extension until full annual audits and unannounced inspections can be conducted for their facilities. In the interim, licensees seeking certification renewal, may be asked to participate in a remote partial audit, as outlined in section 2.2.2.

3.2 Dormant Licenses

A dormant license involves a licensee that has not used certification labels in the past one year. During the COVID-19 pandemic, licensees will be granted an additional four months, or one year and four months total, before they are considered a dormant licensee. The GoodWeave International (GWI) Certification Division will consider requests from licensees to delay dormancy status if they have a good record of using certification labels in the past, and can demonstrate their intention to use certifications labels in the future.

3.3 New Licensee Applicants

GoodWeave will continue to accept new applications and proceed with processing paper work remotely in preparation for when initial audits can resume.

4. LABEL POLICY

GoodWeave continues to issue certification labels to licensees under the following conditions that have been approved by the GWI Certification Committee.

4.1 Conditions Under Which Labels are Issued

GoodWeave continues to issues labels to exporters with valid license agreement and licensees that want to renew expired licenses. The following conditions must be met:

- If licensee does not have any pending major non-compliances;
- If there are pending Major Non-Compliances, labels will only be issued after the licensee takes the required corrective action;
- If there are pending Minor Non-Compliances, labels will be issued after the licensee submits a letter guaranteeing to complete corrective action within the stipulated time frame; and,
- If labels are requested for order produced in a newly added unit that has not yet been audited or inspected, labels will be issued only after the licensee submits a letter guaranteeing to allow GoodWeave to inspect the unit immediately after the lock down is suspended and it is safe for the inspectors to visit worksites. The letter must state that ‘in case child labor is found in this facility by the GoodWeave team, we agree to delist the facility from our supply chain for any future production’; and,
- If the license is expired, the licensee must submit a letter guarantying to complete the renewal immediately after the lock down is suspended and it is safe for the inspectors to visit worksites.

4.1 Continuous review of uninspected licensees receiving label

All approvals made without inspections of facilities will be reviewed every three months by the Certification Committee in the light of the COVID situation.

5. REQUIREMENTS FOR RESUMING IN-PERSON AUDITS AND INSPECTIONS

5.1 Timeline

Thirty days after national lockdowns in India and Nepal end, GoodWeave will assess whether in-person visits to worksites can resume in all or some locations where GoodWeave operates. Re-assessments will occur every week for all locations to determine whether in-person visits should continue, and whether there are additional locations where in-person visits can resume.

In addition to adhering to national and local regulations, GoodWeave will consider a variety of factors before determining whether in-person audits and inspections can be safely resumed.

5.2 Justification and requirements for in-person visits

In-person audits and inspections are only conducted if it is crucial. The priorities listed in section 2.2.1 should be met before scheduling in-person visits.

GoodWeave ensures that production sites have health and safety policies and procedures in place for COVID-19 prior to conducting in-person visits. Protocols must also be agreed upon with management for notification should there be a need for contact tracing. Management must also clearly communicate and ensure that GoodWeave personnel will be received and that the staff at the location are healthy.

5.3 Child Labor Protocols for Non-Inspection Site Visits

If GoodWeave personnel detect child labor during an in-person visit to any worksite, including home-based worksites, that is not part of an audit or inspection, they are required to fill out the Child Labor Investigation Form on GoodWeave's supply chain data platform, report the incident to the contractor/supplier, and refer the child for remediation services.

6. PROCEDURES FOR DEPLOYING GOODWEAVE STAFF FOR IN-PERSON VISITS

GoodWeave's primary concern is for the health, safety, and well-being of its team members. The following procedures must be followed when deploying GoodWeave staff for in-person audits and inspections:

- Any staff who are not comfortable resuming in-person visits, are at heightened risk, or live with vulnerable persons, are not required to do so. Management must confirm with each staff member individually about their willingness and risk factors for conducting in-person visits.
- GoodWeave management should verify that all field staff have a health insurance policy in place before they resume field work.
- If an inspector suspects that they may be sick, they are not permitted to conduct in-person visits. They must remain at home or immediately return home if they become sick and report to their supervisor.
- It is recommended that inspectors check their temperature every day before work and if they have a temperature over 37°C they should stay home and report to their supervisor.
- If inspectors must go out in teams, they must be in the same pairs or groups of four and if any one of them gets sick, they all must self-isolate in order to reduce the potential for infecting other inspectors.
- If an inspector suspects that they are sick following an onsite visit, they must immediately notify the production unit and the production manager must inform all of the workers that GoodWeave inspectors came into contact with.

- Inspectors must always utilize proper social distancing while using public transport.

7. HEALTH AND SAFETY REQUIREMENTS DURING IN-PERSON VISITS

When going back to worksite and home-based visits for any purpose, including check-ins, audits and inspections, all GoodWeave personnel must comply with the following health and safety precautions:

- All interviews with owners, management, workers, and home-based workers will occur on a voluntary basis. If the workers do not feel comfortable with the interview, then GoodWeave must not press the issue. GoodWeave receive verbal permission from each individual interviewed.
- As feasible, do not use more than one inspector/auditor for in-person visits.
- When conducting interviews, GoodWeave will conduct interviews until the point that the minimum number of workers needed to be sampled for the production unit has been reached, and no more than that minimum to limit exposure.
- Protective masks or helmets with face coverings must be worn by GoodWeave personnel at all times. GoodWeave personnel must not share masks or face coverings under any circumstances. Face masks should be sanitized after use and kept in a clean location until the next use.
- Personnel must also carry hand sanitizer with them and use the hand sanitizer if they touch any surfaces, documents or items. However, personnel should avoid touching anything that is not necessary.
- Personnel must ensure they also avoid touching their faces when conducting visits.
- GoodWeave must ensure that any individuals they interact with are also using a protective mask. GoodWeave must be prepared to offer protective masks and hand sanitizer to any individuals they come across that need them.
- Personnel must stand at least 6 feet apart during any conversations or interviews.
- Interviews should be conducted outside, in a well-ventilated environment.
- Group interviews should not be conducted until revised guidance is provided.
- Social greetings, such as hand shaking and hugging, are not permitted.