

GW Document ID #: SOP 16	Document Name: SOP Remote Audit and Inspection
Issue #: 1.0	Issue Date: April 29, 2021



GoodWeave International SOP: Remote Audits and Inspections

1. Scope

This GoodWeave International Standard Operating Procedure applies to all country offices that carry out audits and inspections related to GoodWeave licensing and certification. It defines when remote audits and inspections may be used and the protocols for conducting them.

2. Related Documents

SOP04 IMC Manual

SOP10 GoodWeave Certification Operations and Personnel Protections During COVID 19 Pandemic

3. Definitions

Remote Audit - a complete and systemic review of a producer using remote technology to verify compliance with the GWI Standard conducted using video conferencing technology.

Remote Inspection- a check-in with a producer using remote technology to assess compliance with the certification principles in the GWI Standard.

4. Procedure

4.1. Use of Remote Audits and Inspections

4.1.1. In extraordinary circumstances, remote audits and inspections may be used to replace or supplement on-site audits and inspections. Generally remote audits and inspections are used only when staff are prevented from conducting on-site audits/inspections for a prolonged period of time.

4.1.2. GWI Certification Division approves the use of remote audits/inspections to replace or supplement on-site audits/inspections.

4.1.3. Remote audits may be used to replace an initial or annual audit at an exporter (level 1) or an inspection at subcontractor (level 2) production site. Remote audits are not used at home based worksites (level 3).

4.1.4. Remote inspections may be used to replace in-person inspections at home based worksites. Remote inspections may also be used at informal subcontractor worksites where it is not feasible to do a remote audit. Subcontractor worksites with fewer than 5 workers or those which cannot support the technology for remote audit may be considered for remote inspections.

4.1.5. Remote inspections may also be used out of cycle (not as a replacement for a planned unannounced inspection) to check in with level 1, 2 or 3 production sites who have not

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recently had an on-site or remote audit/inspection, if there are suspected issues, open major non-compliances, etc.

4.2. Scope of Remote Audits and Inspections

4.2.1. Remote audits include off-site document review prior to the start of the audit and a systemic review of objective evidence using remote video technology to assess compliance with the GWJ Standard.

4.2.2. Remote audits that replace an exporter's initial or annual audit include assessment against the certification principles and progress principles in the GWJ Standard. Remote audits of subcontractor sites (see 4.1.4) include an assessment against certification principles only.

4.2.3. Remote Inspections are interviews with producers to assess compliance with certification principles in the GWJ standard. Remote inspections may be done over a phone interview or video call.

4.3. Remote Audits - Planning

4.3.1. Remote audits are announced.

4.3.2. If a remote audit is being used for an initial audit, this is determined at the time of the exporter's application. If a remote audit is being used to replace an annual audit, this is determined approximately two-three weeks prior to the due date for the annual audit.

4.3.3. Approximately two weeks prior to the audit date, GoodWeave contacts the producer to explain the remote audit and coordinate logistics.

4.3.3.1. GoodWeave and the producer determine what technology will be used to conduct the remote audit. GoodWeave confirms with the producer that:

- They have access to video conferencing software such as Skype, Zoom, WhatsApp, or Microsoft Teams, and agree which software to use. Use of a different software must be approved by the GWJ Director of Standards and Certification.
- There is staff at the production site with basic understanding of the technology to be used, and who can help troubleshoot issues that may arise.
- The producer has the ability to share screens (for record review).
- That there is sufficient connectivity at the production site to conduct a remote audit. There should be enough connectivity to support video conferencing and sharing of files.

4.3.4. If the producer cannot support the technology needed to conduct a remote audit, a partial remote audit may be conducted instead.

4.3.4.1. The Certification Division Director must grant permission for a partial remote audit.

4.3.4.2. Partial remote audit consists of document review and phone interviews with management.

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4.3.5. Remote audits should be conducted with a facilitator, if it is safe to do so. The role of the facilitator is to carry out specific audit tasks on behalf of the auditor, including operating the camera during a walk through, setting up worker interviews, and other tasks the inspector deems necessary.

4.3.5.1. During the audit planning, GoodWeave confirms who will act as facilitator.

4.3.5.2. Whenever possible, facilitators should be independent of the producer being audited. Child Friendly Community facilitators may be used for this purpose. If it is not possible to have an independent facilitator, management staff at the production site may play this role. Production workers may not be used for this purpose.

4.3.5.3. Use of facilitators must be in line with SOP10 Operations and Personnel Protections During COVID 19 Pandemic, to ensure the safety of workers and staff.

4.3.5.4. If the producer has strict policies limiting visitors, an outside facilitator is not used and the producer appoints a facilitator.

4.3.6. At least one week prior to the remote audit, GoodWeave sends an audit agenda to the producer. The audit agenda explains what technology will be used to conduct the audit, if there will be a facilitator used, what staff at the production site needs to be available and what documents need to be reviewed as part of the audit.

4.3.7. During the planning process, GoodWeave should also confirm that production is still taking place at the worksite. If production has been paused due to a lockdown or due to lack of orders, the remote audit may be postponed. The GWJ Certification Division Director approves any such postponements.

4.3.8. When sending the audit agenda, GoodWeave also asks the producer to provide documentation relating to compliance with the GoodWeave standard. The following documents should be requested:

- Legal documents including registration, factory license, etc.
- Map/floorplan of the facility or description of the facility including number of buildings
- Child Labor policy
- Child labor remediation plan
- List of all subcontractors, intermediaries, and home-based workers
- Policies on recruitment practices, employment terms and discipline
- Health and safety risk assessment

4.3.8.1. If these documents are not provided in advance, they may be reviewed during the remote audit (e.g. via screen sharing).

4.3.8.2. If a map/floorplan is not available, the producer should provide a description of the size and layout of the production site.

4.3.8.3. A secure site such as Dropbox, or Box should be used to transmit these files. GoodWeave never asks producers to email sensitive or confidential information. File should always be shared via a secure site.

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4.3.9. Approximately one week prior to the audit, the inspector should have a remote meeting with staff at the producer to test out the technology being used for the audit.

4.4. Conducting Remote Audits

4.4.1. Remote audits consist of the same main activities that take place during an on-site audit – document review, management interviews and worker interviews. As with on-site audits, inspectors use the principle of triangulation to cross check multiple sources of information and detect non-compliances.

4.4.2. Remote audit reports are completed in ChainPoint. The entire audit checklist must be filled in by the inspector. If any questions in the audit checklist cannot be answered, the inspector enters N/A as the answer choice and explains in the comments why the question could not be assessed.

4.4.3. Remote audits should start with a facility walk through.

4.4.3.1. For larger facilities, a map or floorplan should be obtained in advance (see section 4.3) or reviewed during the opening meeting, so that the inspector can ensure the entire site is included in the walk-through.

4.4.3.2. The facilitator should use a mobile phone to conduct the walk-through. The inspector should clearly direct the facilitator, instructing them on where to go and what parts of the facility they should film.

4.4.4. The remote audit includes document review.

4.4.4.1. If the producer maintains soft copies of records, such as timekeeping and payroll, screen sharing may be used to review records. Soft copies of documents reviewed should also be transmitted to GoodWeave.

4.4.4.2. Documents that should be reviewed are the same as those reviewed during an on-site audit, including (but not limited to):

- Age records/documentation
- Contracts/employment agreements
- Timekeeping records
- Payroll records
- Register of young workers (if applicable)
- Education/employment plan for young workers (if applicable)

4.4.4.3. Soft copies of records that are reviewed are retained.

4.4.5. Inspectors verify the number of workers employed at the site and select a sample for record review (payroll, working hours, and personnel files). When applicable, sampling should include both workers who are present on the day of the remote audit and workers who are not present.

4.4.6. Worker interviews must be managed carefully to ensure quality information is gathered.

4.4.6.1. Workers should be selected for interviews based on the attendance records for the day of the remote audit.

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- 4.4.6.2. Worker interviews should be conducted in a space where workers feel comfortable and where management is not present.
 - 4.4.6.3. Facilitators may be used to set up a laptop or mobile phone so that the inspector can conduct the interview. If the device (mobile phone or laptop) being used for the interview belongs to the producer, the inspector must ensure that the interview is not recorded and saved on the device. Check that there is no notice that the call is being recorded.
 - 4.4.6.4. Facilitators should not be present during the worker interviews.
 - 4.4.6.5. Worker interviews may be conducted by speaking to a worker on their mobile phone. In these cases, the auditor should use a video chat (Skype or WhatsApp) and confirm the worker's identity by having them show identification, before proceeding with the interview.
 - 4.4.6.6. Group interviews are not conducted as part of a remote audit.
- 4.4.7. During a remote audit, inspectors ask for an updated list of subcontractors/home based worksites and confirm with the producer if those worksites are active. The remote audit includes a review of work orders, challans or other documentation showing what work is being sent out to subcontractors/home based worksites.

4.5. Remote Inspections - Planning

- 4.5.1. Remote Inspections are unannounced.
- 4.5.2. If a remote inspection is replacing an unannounced inspection, this is decided by GoodWeave at least 1 week in advance of the due date for the unannounced inspection.
- 4.5.3. One week prior to the remote inspection, GoodWeave confirms they have a mobile number to contact the producer and checks if the producer uses WhatsApp.

4.6. Conducting Remote Inspections

- 4.6.1. Video conference using WhatsApp is the preferred method of conducting remote inspections, but remote inspections may be done with a phone call (not a video call).
- 4.6.2. On the date of the remote inspection, the inspector contacts the producer using WhatsApp or their mobile number.
 - If the inspector reaches the producer, they explain they are with GoodWeave and ask if they have 15-20 minutes to answer some questions.
- 4.6.2.1. If the producer does not have time for the call, the inspector arranges to call back at a different time.
- 4.6.2.2. If the producer does have time for the call, ask if they are comfortable using the video call feature.
- 4.6.2.3. If the producer does not answer/is not available, the inspector calls back the same day to try and reach the producer.

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4.6.3. The inspector confirms if the producer is currently working/accepting orders. If they are not working/accepting orders, this is noted in the inspection report. If necessary, the inspector confirm with the subcontractor if the homebased worksite is active, and updates the homebased worker's status in Chainpoint.

4.6.4. If the producer is comfortable with a video call, the inspector asks them to show them their homes and/or workspaces so they may be visually inspected.

4.6.5. The inspector uses the questions in the audit checklist to confirm compliance with the GWJ Generic Standard.

4.6.6. Remote inspection reports are completed in ChainPoint. The entire remote inspection audit checklist must be filled in by the inspector. If any questions in the audit checklist cannot be answered, the inspector enters N/A as the answer choice and explains in the comments why the question could not be assessed.

4.7. Audits/Inspections that Cannot be Conducted

4.7.1. If a remote audit/inspection cannot take place for any reason, including: the producer refuses to accommodate the remote audit/inspection; there are technical issues; or the producer cannot be reached via phone then this is captured in Chainpoint under "Key Observations – Audit Completion".

4.7.2. If an audit/inspection cannot take place at a subcontractor or home based worksite, GoodWeave informs the exporter/subcontractor and attempts to have the exporter/subcontractor use their leverage to facilitate scheduling of the remote audit/inspection.

4.7.3. If a remote audit/inspection cannot take place at an exporter, the country office informs the GWJ business development team so that the relevant importer(s) may be informed.