Audit Requirements for Accredited Certification Bodies for the SA8000 Program

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</table>
Section 2

Contents
2. Contents

1. Revision History .................................................................................................................................................. 1
2. Contents ............................................................................................................................................................ 3
3. List of Tables & Figures .................................................................................................................................... 7
4. Foreword ......................................................................................................................................................... 9
5. Purpose .......................................................................................................................................................... 11
6. Scope ........................................................................................................................................................... 13
7. Acronyms and Definitions ............................................................................................................................ 15
   7.1 Acronyms .................................................................................................................................................. 15
   7.2 Definitions ................................................................................................................................................ 15
8. Reference Documents ................................................................................................................................... 21
   8.1 The Certification Standard & PIA ........................................................................................................... 21
   8.2 Mandatory SAAS Procedures To Be Used By All CBs ....................................................................... 21
   8.3 Mandatory Certification Guidance Documents ................................................................................. 21
   8.4 Guidance For Management System Maturity ....................................................................................... 21
   8.5 Bibliography ......................................................................................................................................... 21
9. General Principles ........................................................................................................................................... 24
   9.1 Requirements ......................................................................................................................................... 24
10. Scope of SA8000 Certification .................................................................................................................... 27
10.1 Requirements ......................................................................................................................................... 27
11. SA8000 Certification Process Requirements ............................................................................................. 30
   11.2 Audit Disruptions ................................................................................................................................ 33
12. General Audit Planning (Excluding Audit Effort) ....................................................................................... 36
   12.1 Audit Plans - (ISO/IEC 17021-1:2015 Clause 9.2) ............................................................................. 36
13. Pre-Assessment and Initial Research .......................................................................................................... 39
   13.1 Pre-Assessment Audit.......................................................................................................................... 39
   13.2 Initial Research .................................................................................................................................... 39
14. Stage 1 Audits ............................................................................................................................................... 42
   14.1 Stage 1 Assessment .............................................................................................................................. 42
   14.2 Stage 1 Audit Preparation .................................................................................................................. 43
   14.3 Stage 1 Audit Outcomes .................................................................................................................... 43
15. Stage 2 Audits ............................................................................................................................................... 46
   15.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.3.1.3) .................................................... 46
   15.2 General Audit Steps ........................................................................................................................... 47
   15.3 Opening Meeting - (ISO/IEC 17021-1:2015 Clauses 9.4.2) .............................................................. 47
   15.4 Organisation Overview Tour ............................................................................................................. 48
   15.5 Organisation Health & Safety & Working Conditions Tour (OHS) .................................................. 49
   15.6 Confirmation of Documents & Records for Review ........................................................................ 49
15.7 Management System Review ................................................................. 50
15.8 Interviews ............................................................................................ 52
15.9 Closing Meeting - (ISO/IEC 17021-1:2015 Clauses 9.4.7) ................. 54
16. Surveillance Audits. .................................................................................. 57
16.1 General - (ISO/IEC 17021-1:2015 Clauses 9.6.2) ................................. 57
16.2 Unannounced Surveillance Audits ...................................................... 61
16.3 Monitoring Certified Organisation Performance and Non-Conformity Trends Each Surveillance Audit 62
16.4 Surveillance Audit Worker Interview and Record Review ..................... 63
17. Recertification Audits ............................................................................ 66
17.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.6.3) .................. 66
18. Transfer Audits (ISO/IEC 17021-1:2015 Clauses 9.5.3.3) ....................... 69
18.1 General Requirements ......................................................................... 69
19. Special Audits ....................................................................................... 72
19.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.6.4) ............. 72
20. Audit Days – Single Site ......................................................................... 74
20.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.1.4) .............. 74
20.2 Single Site Initial Certification Audit Effort ............................................ 74
20.3 BSCI Audit Days-Reduction ............................................................... 76
20.4 Initial Audit Days for CB’s First Certification in a New Country ............. 76
20.5 Single Site Surveillance Audit Effort ..................................................... 77
21. Multi-site Certification Audits................................................................. 79
21.1 Background and Context ...................................................................... 79
21.2 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.1.5) ............. 79
21.3 Applicability of SA8000 Multiple-Site Certification ............................. 81
21.4 Manufacturing Multi-site Stage 1 and 2 Audit Effort – Head Office Audit 81
21.5 Manufacturing Multi-site Stage 2 Audit Effort – Other Factories/Sites .... 82
21.6 Manufacturing Multi-site Surveillance Effort – Head Office ................. 83
21.7 Manufacturing Multi-site Surveillance Effort – Other Factories/Sites ....... 83
21.8 Service, Farms and Plantations Multi-Site Stage 2 Audit Effort – Head Office Audit 85
21.9 Service, Farms and Plantations Multi-Site Stage 2 Audit Effort – Sites .... 85
21.10 Service, Farms and Plantations Multi-site Surveillance Audit Effort ...... 87
21.11 Multi-site Recertification Audits – All Sectors ..................................... 87
22. Non-Conformity Classification ............................................................... 89
22.1 General - (ISO/IEC 17021-1:2015 Clauses 9.4.5; 9.4.9; 9.4.10) ............ 89
22.2 Non-Conformity Findings Classification ............................................. 90
22.3 Non-conformity definitions ................................................................. 90
22.4 Non-conformity Format ....................................................................... 91
22.5 Closure of Non-Conformities during Audits ........................................ 93
22.6 Closure of Non-Conformities....................................................................................................... 93
23. Audit Reporting.......................................................................................................................... 95
23.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.4.8)........................................ 95
23.2 Audit Report Content............................................................................................................... 95
24. Audit Records........................................................................................................................... 98

Annex A Change History Log........................................................................................................ 100
Section 3

List of Tables & Figures
3. List of Tables & Figures

Table 1 - Shift Pattern Audit Effort .................................................................32
Table 2 - Audit Plan Details ........................................................................ 37
Table 3 - Objectives of a Stage 1 Audit ....................................................... 42
Table 4 - SA8000 Stage 1 Audit Steps ....................................................... 43
Table 5 - SA8000 Stage 2 Audit Steps ........................................................ 47
Table 6 – Initial (Stage 2) Audit - No. Of Records to Be Reviewed .............. 50
Table 7 - Management System Elements .................................................. 51
Table 8 - Photographs Required .................................................................. 51
Table 9 – Initial (Stage 2) Audit Number of Workers To Be Interviewed .... 53
Table 10 - Mandatory Items to Be Audited During Surveillance Audits .... 60
Table 11 – Targets & Objectives to Be Audited Each Surveillance Audit ....... 61
Table 12 – Minimum Number and Recommended Timeframe of Unannounced Surveillance Visits - 6 Monthly Surveillance ................................................................. 62
Table 13 - Required Number of Worker Files to Be Reviewed Per Surveillance Audit ................................................................. 63
Table 14 - Surveillance Audit Number of Workers to Be Interviewed ....... 64
Table 15 - Single Site Initial Certification Audit Effort in Days ...................... 75
Table 16 - Single Site Surveillance Audit Effort ......................................... 77
Table 17 - Multi-Site Other Factories/Sites Minimum On-Site Initial Audit Effort ................................................................. 83
Table 18 - Multi-Site Other Factories/Sites Minimum On-Site Surveillance Audit Effort ................................................................. 84
Table 19 - Manufacturing Group Audit Effort Example .............................. 84
Table 20 - Manufacturing Group Records & Worker Interview Example .... 84
Table 21 - Service, Farms and Plantations Multi-Site Stage 2 Audit Effort – Sites ................................................................. 86
Table 22 - Example Of Service, Farms and Plantations Stage 2 Audit Effort ............................................................................ 86
Table 23 – Time-Bound Non-conformities .................................................. 91
Table 24 - NC Response & Close-Out Timescale ........................................ 92
Table 25 - Audit Report Content .................................................................. 96
Table 26 - Audit Records ............................................................................. 98

Figure 1 - Initial Audit Process ....................................................................30
Figure 2 - Surveillance During The SA8000 Certification Cycle ....................57
Section 4

Foreword
4. Foreword
SA8000 is an international standard for improving working conditions around the world. It is based on the principles of thirteen international human rights conventions and is intended to help apply these norms to practical work-life situations and expands on the conventions of the ILO’s Declaration of Fundamental Principles of Rights at Work. The management system requirements of SA8000 move beyond a checklist approach, encouraging sustainable systemic changes in how a workplace is managed.

Once an organisation has implemented the necessary improvements and systemic changes, it can earn an accredited SA8000 certificate attesting to its conformance with SA8000. Accredited certification demonstrates good practice to consumers, buyers, companies, and other stakeholders interested in working conditions within that organisation. Maintaining and improving the systems put in place to achieve SA8000 certification is an ongoing continuous process and substantive and meaningful worker participation in this process is the best means to ensuring systemic change.

The SA8000 Standard was last revised and published in 2014. The content of this audit requirements document is based upon input from Social Accountability International (SAI), and feedback from Certification Bodies (CBs), non-governmental organisations (NGOs), employers, buyers, Trade Unions and other stakeholders as well as informed by SA8000 certification audits conducted by SAAS-accredited CBs and SAAS accreditation audits.

SA8000 is compatible with an integrated management system approach to business improvement and as such could be an aspect of the way that all organisations do business. See www.saasaccreditation.org/accreditation-requirements for a cross-reference matrix.
Section 5

Purpose
5. **Purpose**

This requirements document has been written collaboratively with SAI, at the request of SAI, and has been created for use by SAAS applicant and accredited Certification Bodies to reliably assure consistent application of the SA8000 audit requirements by its audit team members. These specifications have been created in order to:

- Establish SA8000 scheme-specific requirements that build upon the general accredited conformity assessment requirements found in implementation of ISO/IEC 17021-1:2015;
- Provide documentation to assure continuity and consistency of the SA8000 audit process and resulting certification; and
- Establish consistent and reliable SA8000 audit process requirements for accredited Certification Bodies to deliver SA8000 assessment activities in a robust and replicable manner.

Its primary purpose is to provide an infrastructure for consistent delivery of SA8000 certification audits and is used, along with Procedure 201A, Procedure 201B, and ISO/IEC 17021-1:2015, to provide criteria against which SAAS may evaluate and measure an applicant or accredited CB in delivering SA8000 assessment services.

SAAS has promulgated separate documents, Procedure 201A and 201B, which outline the structure, competence and certification process requirements for the management of SA8000 activities within the CB, as well as detailing the accreditation process and oversight by SAAS.

The term “SHALL” is used throughout this document to indicate those provisions that are mandatory. Requirements stated in this document SHALL be integrated into the procedures and processes of the CBs. This document SHALL be updated from time to time by SAAS after consultation with appropriate stakeholders and at the request of SAI, and is subject to regular review by SAAS and its Board of Directors, and SAI and its Board. Additional requirements may be promulgated in the form of “Notifications” or “Advisories.” Those documents SHALL be considered requirements for implementation by CBs and SHALL be integrated into the procedures and processes of the accredited CBs.
Section 6

Scope of Procedure 200
6. Scope

This document provides a framework for assurance of the SA8000 audit system and sets out minimum audit criteria for assessing organisations seeking SA8000 certification by accredited and applicant Certification Bodies. Conformance to the requirements in this document, as well as Procedure 201A and Procedure 201B, provides greater assurance that accredited CBs are performing SA8000 audit process requirements in a consistent and effective way.

Together, the principles found in Procedures 200 and 201 specify requirements for the SA8000 audit, which is an input to the certification process. These documents specify requirements for personnel competence, audit process, systemic impartiality and transparency. The assurance and oversight process defined by SAI and monitored by SAAS are expected to lead to consistent audit outcomes and performance by audit personnel.

This document supersedes all previous versions of Procedure 200 and related Advisories and prescribes the requirements that a CB must include in carrying out assessment of a client organisation that submits itself for verification of conformance with the SA8000 certification standard. The assessment of such an organisation is purely voluntary. It is the responsibility of any such organisation to provide adequate evidence that SA8000 certification is justified.
Section 7

Acronyms and Definitions
7. Acronyms and Definitions

The following acronyms and definitions are used within this document. **Note:** all definitions found in the SA8000:2014 Standard apply to this document and, where they differ, supersede the definitions in ISO/IEC 17021-1:2015 and ISO/IEC 17011:2004.

### 7.1 Acronyms

7.1.1 CB = SAAS Accredited Certification Body (or applicant Certification Body); equivalent to CAB

7.1.2 CBA = Collective Bargaining Agreement

7.1.3 IAF = International Accreditation Forum (www.iaf.nu)

7.1.4 IEC = International Electrotechnical Commission

7.1.5 ISO = International Organisation for Standardisation (www.iso.org)

7.1.6 ISO 17021 = ISO/IEC 17021-1:2015

7.1.7 ISO 19011 = ISO 19011:2011

7.1.8 ISO 17011 = ISO/IEC 17011:2004

7.1.9 NGOs = Non-Governmental Organisations

7.1.10 Proc. 201 = SAAS Procedure 201A

7.1.11 SA = Social Accountability

7.1.12 SAI = Social Accountability International (www.sa-intl.org)

7.1.13 SAAS = Social Accountability Accreditation Services (www.saasaccreditation.org)

7.1.14 SPT = Social Performance Team

7.1.15 TU = trade union

### 7.2 Definitions

7.2.1 **Breach of Ethical Standards** = Verified intentional attempts to corrupt or defraud the SA8000 audit process. See also the definition of Critical Non-conformity and the section in this document for Audit Disruptions.

7.2.2 **Certification Cycle** = The certification cycle for the SA8000 client begins with the certification or recertification decision. The length of the cycle is limited to three years. The audit program for the SA8000 client SHALL be determined for the full three year certification cycle.

7.2.3 **Certification Country Risk Assessment Process** = SAAS coupled the risk ranking of the Worldwide Governance Indicators (WGI) with strategies to provide a greater level of assurance as part of the SA8000 certification process. The application of certification process requirements vary based on the country risk assessment and affect the frequency of SA8000 surveillance audits, unannounced audits, application of multi-site certificates and worker interviews, as identified in this document. See also [www.saasaccreditation.org/accreditation-requirements](http://www.saasaccreditation.org/accreditation-requirements)
7.2.4 **Company** = SA8000:2008 refers to “Company” throughout the text of the Standard. SA8000:2014 refers to “Organisation” throughout the text of the Standard. In this procedure, the term “organisation” is synonymous with “company” as defined in SA8000:2008. “Facility” and “workplace” SHALL refer specifically to a physical site, location or building in which the company resides.

7.2.5 **Consortium** = An association of two or more companies with the objective of participating in a common activity.

7.2.6 **Contractor** = An organisation or person that enters into a contract. *Note: commonly a CONTRACTOR is a person or entity that agrees to provide services (example: The party responsible for the overall job is a "general contractor," and those he/she/it hires to undertake specific jobs on behalf of the contractor are "subcontractors," who are responsible to the general contractor.)*

7.2.7 **Corrective action** = Action taken to eliminate the cause of a non-conformity upon undertaking a root cause analysis. It includes the action taken to prevent recurrence of a non-conformity whereas preventive action is taken to prevent initial occurrence of a non-conformity. In the SAAS-accredited system, corrective action is undertaken to impact the entirety of the CB’s accredited management system for performing SA8000 audits. *Note: There is a distinction between correction and corrective action. Correction is action undertaken immediately to eliminate the detected non-conformity but not necessarily the cause.*

7.2.8 **Critical Non-Conformity (CNC)** = A grievous breach of the SA8000 Standard that results in severe impact to individual rights, life, safety and/or SA8000, SAAS or SAI’s reputation. SA8000 certificates may be denied, cancelled or suspended when CNCs are confirmed.

7.2.9 **Exclusive supplier** = A supplier that produces product(s) or supplies a process(es) exclusively for a single customer. In the context of this document, exclusive supplier refers to a supplier that supplies only to one customer and whose work force is to be considered a part of the organisation that is being certified. Such a supplier may be on-site or off-site and SHALL be included as part of the scope of the certification audit (and hence audit day calculations) rather than the control of suppliers clause of SA8000. Exclusive suppliers SHALL NOT be included on their customers SA8000 Certification Certificate. For audit effort calculations, the employees of the exclusive supplier are added to those of their customer.

7.2.10 **Full-Time Equivalent (FTE)** = Full-time equivalent employees equal the number of employees on full-time work plus the number of employees on part-time work converted to a full-time basis. FTE is sometimes referred to as Effective Number of Personnel. The use of FTE for audit effort calculations is not permitted for SA8000 certification.

7.2.11 **Grievous and Intentional Violations of Human Rights** = Intentional egregious violations of human rights. See also Critical Non-Conformity.

a) As the aim of the audit process is to evaluate conformity with the SA8000 Standard, efforts SHALL be made by the applicant or certified organisation to rapidly bring about the necessary changes to address these violations.
b) If there is a clear determination shown by management and immediate action is taken to remediate the violations, this will be considered as an acceptable corrective action.

7.2.12 Immediate Threats to Worker Lives = Verified immediate threats to worker lives or safety. See also Critical Non-Conformity.

a) New certificates may be issued and suspensions may be lifted when the threat(s) is remedied.

b) The organisation may apply for certification when they have: 1) received sign-off by a CB on a corrective and preventive action plan; and 2) completed all required actions in the corrective and preventive action plan according to their proposed timeframe.

c) Certificates SHALL be withdrawn if the organisation is unable to meet the proposed timeframe in their remediation/corrective and preventive action plan.

7.2.13 Indirect Workers = Workers of a subcontractor working on-site of the applicant or certified organisation and/or off-site but under direct control of the certified organisation.

7.2.14 Maritime Activities = Those involving seafarers, i.e. any persons employed or engaged or working in any capacity on board a ship. See also SAI's SA8000:2014 Certification Exclusion List.

a) Maritime Activities are further broken down into those excluded from SA8000 certification and those that are not.

b) Maritime Activities excluded from certification are those covered by the ILO Maritime Labour Convention, 2006 (NO. 186), (MLC).

c) Maritime Activities that may be eligible for certification are those that relate to seafarers on vessels that navigate exclusively in inland waters or waters within, or closely adjacent to, sheltered waters or areas where port regulations apply.

d) The determination as to whether a ship is a certifiable workplace will depend on several factors, including definitions supplied by local regulations.

7.2.15 Micro-enterprises = In the context of this document, a micro-enterprise SHALL be defined as having 10 or fewer personnel.

7.2.16 Multi-Site organisation = An organisation with an identified central management function (central office or headquarters or head office) at which organisational activities are planned, controlled, and/or managed with a network of offices, branches or sites at which activities are carried out. A multi-site organisation need not be a unique legal entity, but all sites shall have a legal or contractual link with the central office and be subject to a common management system. See also Site.

7.2.17 Multi-Site documentation review audit = A review of randomly chosen time and attendance, payroll, internal audit results and employee complaints records at a Multi-Site Head Office Audit.

7.2.18 Multi-Site Limited Audit = A reduced audit effort audit at a location(s) chosen at random and performed unannounced on-site. See multi-site audits, Section 21, for additional details.
7.2.19 **Non-Conformity (NC)** = If fulfilment of specified requirements have not been demonstrated, a finding of non-conformity SHALL be reported. In the SAAS-accredited system, identification of NCs initiate a corrective action request (CAR). A CAR is the initial stage in the corrective action process. A corrective action SHALL be initiated as a result of a non-conformity. This process includes containment/correction, root cause analysis, corrective action and follow-up. NCs SHALL be logged using a nonconformance report (NCR) to log and track occurrence and reoccurrence of NCs.

7.2.20 **On-Site Supplier/Sub-supplier/Subcontractor** = Organisation or person that provides a product or a service produced on one (or more) sites of the client/certified organisation.

7.2.21 **Organisation headquarters** = The controlling location (central office or headquarters or head office) of the management system, as utilized in defining a multi-site audit scheme. See also Multi-Site organisation.

7.2.22 **Risk Assessment** = Process to identify potential hazards and analyze what could happen if a hazard occurs.

7.2.23 **Risk Management Approach** = The process of identifying risk, assessing risk, and taking steps to reduce risk to an acceptable level. The risk management approach determines the processes, techniques, tools, and team roles and responsibilities for a specific activity.

7.2.24 **Root Cause Analysis** = Application of a problem solving methodology such as “5 Whys” or “Pareto Analysis” which is used for identifying the root causes of faults or problems. Certified organisations are expected to use Root Cause Analysis to address NCs to look deeper into problems and find out why they’re happening.

7.2.25 **Service Sector** = Sector of business that is made up of companies that primarily earn revenue through providing intangible products and services. Service industry companies are involved in retail, transport, distribution, food services, cleaning, banking, education, as well as other service-dominated businesses.

7.2.26 **Shell Company or Shell Organisation** = In the context of this document, “shell” companies subcontract the vast majority of the end product or service. These companies often seek certification as a means of obtaining contracts through government tenders but do not perform the service for which the tender has been created. A shell company SHALL not be approved for SA8000 certification.

7.2.27 **Should** = The term “should” is used in this document to indicate recognized means of meeting the requirements. A CB can meet these in an equivalent way if it can be demonstrated to SAAS. The term “SHALL” is used to indicate those requirements that are mandatory.
7.2.28 **Site** = Location where an organisation carries out work or a service. Sites are defined as either temporary or permanent as described below: These definitions are not relevant to contract length. See also Multi-Site organisation.

a) A **temporary site** is one set up in order to perform specific work or service for a finite and limited period of time for example: Construction Sites, Temporary Exhibitions, Outdoor events and concerts, Event caterers, One off customer call-out to repair items - e.g. photocopier repair or fire/security alarm installations.

b) A **permanent site** is one where a CB’s client performs work or provides workers to perform a service on a continuing basis. These are usually an operating Unit owned or leased by the parent organisation to carry out mostly similar kind of activities. The location is permanent and is usually a building or piece of land/garden where the SA8000 certified organisation permanently places their workforce to perform tasks on a fulltime or part time basis every working day.

c) **Additional sites** include a new site or group of sites that are to be added to an existing multi-site organisation.

7.2.29 **Stage 1 Audit** = The first of two audits that a CB conducts for an organisation’s SA8000 management systems certification. The Stage 1 SA8000 audit includes a document review to confirm that the organisation has established procedures and processes, is knowledgeable of legal requirements, and is ready for a Stage 2 SA8000 certification audit. It also involves a Social Fingerprint Independent Evaluation conducted by the SA8000 Lead Auditor.

7.2.30 **Stage 2 Audit** = the second of two audits that a CB conducts of an organisation’s SA8000 management system during the initial certification process. The Stage 2 SA8000 audit confirms that the organisation is effectively implementing a management system and conforming to the requirements of the SA8000 Standard. It also involves a Social Fingerprint Independent Evaluation of the organisation’s Social Fingerprint Self-Assessment, conducted by the SA8000 Lead Auditor.

7.2.31 **Sub-supplier** = Organisation or person that provides a product or a service to a supplier.

7.2.32 **Subcontractor** = Organisation or person who takes a portion of a contract from the principal contractor or from another subcontractor.

7.2.33 **Supplier** = Organisation or person that provides a product or a service.

7.2.34 **Zero Tolerance** = Violations observed during an SA8000 audit that, in the opinion of the CB’s audit team, require immediate action by the CB’s client which SHALL require the CB’s SA8000 auditor to raise a Critical Non-Conformity at the time of observing the violation. This kind of violation observed during an SA8000 audit requires the CB’s SA8000 auditor to immediately contact their CB to seek advice as to whether the audit should be aborted. Zero Tolerance may also be known as a Critical or immediately reportable issue.

Section 8

Reference Documents
8. Reference Documents
In all cases, the current edition of a certification standard, normative document or guidance SHALL be the reference document in this procedure, per the standard’s published rollout schedule. The latest and up to date versions of SAI’s documents can be found on their website at: www.sa-intl.org. The latest and up to date versions of SAAS documents can be found at: www.saasaccreditation.org/document-library.

8.1 The Certification Standard & PIA
8.1.1 SA8000:2014 (Normative Reference*)
8.1.2 SA8000:2014 Performance Indicator Annex (Secondary Reference**)

* Each non-conformity raised by a CB SHALL be cited primarily against the appropriate clause(s) of the SA8000 Standard.

**The CB SHALL use the performance indicators contained in the PIA as a means of evaluating the extent to which an organisation’s activities/controls and social performance conform to each of the SA8000 Standard requirements. The extent of this conformity SHALL be generally documented as an overview in every SA8000 Audit Report.

8.2 Mandatory SAAS Procedures To Be Used By All CBs
The following SAAS Procedures SHALL be used by all CB’s to facilitate the SA8000:2014 Certification Process
8.2.1 SAAS Procedure 200 (this procedure)
8.2.2 SAAS Procedure 200A
8.2.3 SAAS Procedure 201A
8.2.4 SAAS Procedure 201B

8.3 Mandatory Certification Guidance Documents
The following documents are the only approved guidance documents for SA8000:2014
8.3.1 SA8000:2014 Certification Exclusion List
8.3.2 SA8000:2014 Drafters’ Notes
8.3.3 SA8000:2014 Guidance Document

8.4 Guidance For Management System Maturity
The following documents are to be used by CB’s as applicable.
8.4.1 SA8000:2014 Social Fingerprint Glossary
8.4.2 SA8000:2014 Social Fingerprint Rating Chart

8.5 Bibliography
8.5.2 ISO/IEC 17021-1:2015, Conformity assessment -- Requirements for bodies providing audit and certification of management systems -- Part 1: Requirements.
8.5.3 ISO 10018:2012 - Quality management -- Guidelines on people involvement and competence
8.5.4 ISO 19011:2011 Guidelines for auditing management systems
8.5.5 ISO 31000:2009 Risk management — Principles and guidelines
8.5.6 ISO 37500:2014 Guidance on outsourcing
8.5.7 IAF MD 1:2007 Certification of Multiple Sites Based on Sampling
8.5.8 IAF MD 2:2007 Transfer of Accredited Certification of Management Systems
8.5.9 IAF MD 5: 2013 Duration of QMS and EMS Audits
8.5.10 IAF MD 19:2016 - IAF Mandatory Document For The Audit and Certification of a Management System operated by a Multi-Site Organization (where application of site sampling is not appropriate)
Section 9

General Principles
9. General Principles

9.1 Requirements

9.1.1 This document specifies procedures and CB audit process requirements with regard to the assessment of organisations to SA8000.

a) These requirements are binding for CBs accredited for SA8000 by SAAS. Breach of these requirements in any part by an accredited CB SHALL initiate the issuance of non-conformities potentially leading to suspension and the de-accreditation process. Cancellation of SAAS accreditation may result if the breach is not resolved in a timely manner.

b) An accredited CB may exceptionally deviate from the requirements in this document under the condition that it is able to produce relevant and documented justifications. These justifications shall, under evaluation by SAAS, demonstrate confidence in the accredited CB’s management system and delivery of accredited SA8000 certification services.

c) Only clients certified to SA8000 by organisations accredited by SAAS have valid certificates. Any other SA8000 certificates are considered unaccredited and not recognized by SAI and other stakeholders in the process.

d) All SA8000 certificates issued by accredited CBs shall contain the following disclaimer: “Social Accountability International and other stakeholders in the SA8000 process only recognize SA8000 certificates issued by qualified CBs granted accreditation by SAAS and do not recognize the validity of SA8000 certificates issued by unaccredited organisations or organisations accredited by any entity other than SAAS.”

Additionally, all SA8000 certificates shall contain the address of the SAAS website (www.saasaccreditation.org/certification) where stakeholders can confirm the validity of an accredited SA8000 certificate.

e) An SA8000 Certificate Template is available at: www.saasaccreditation.org/accreditation-requirements.

9.1.2 SAAS requires accredited and applicant CBs to conform to ISO/IEC 17021 requirements. These requirements form the basis for the accredited certification process. SAAS assesses CB’s conformance to ISO/IEC 17021 requirements as part of the accreditation and surveillance process, in addition to conformance to requirements within this document.

a) This SA8000 audit requirements document builds upon the basic requirements found in ISO/IEC 17021 to make them specific to the SA8000 scheme.

b) In general, this document focuses solely on the SA8000 audit process requirements and in particular expands on the Clause 9.1 to 9.9 requirements of ISO/IEC 17021-1:2015. The other requirements of ISO/IEC 17021-1:2015 that SHALL be met by SAAS-accredited CBs are described further in other SAAS procedures, specifically SAAS Procedure 201A and 201B.
c) If there is any conflict between SAAS requirements and ISO/IEC 17021 requirements, SAAS requirements SHALL take precedence over ISO/IEC 17021. For further clarification, the CB SHALL contact SAAS when needed.

9.1.3 Accredited CBs SHALL have a documented, structured management system defining the CB’s SA8000 certification processes. Such systems SHALL conform to the requirements in ISO/IEC 17021, SAAS Procedure 200, SAAS Procedure 201A and Procedure 201B and any other requirements disseminated by SAAS.

9.1.4 The CB’s SA8000 certification assessment process SHALL address all SA8000 elements according to the requirements described in this procedure.

9.1.5 All requirements in this procedure which relate to SA8000 clients SHALL be written into the contract with the SA8000 client so that the client clearly understands what is required and accepts those terms upon signing the client contract. For additional details, reference Procedure 201A.

9.1.6 SAAS Advice and Interpretation: SAAS maintains regular contact with CBs and their SA8000 Program Managers. CBs SHALL have designated one staff person (the SA8000 Program Manager, as defined in Procedure 201A and 201B) and a Deputy to interface with SAAS.
Section 10

Scope of SA8000 Certification
10. Scope of SA8000 Certification

10.1 Requirements

10.1.1 SA8000 certification is generally permitted in all countries and is applicable in all industries except as designated in the exclusions below and/or as described in other documents. SAI has developed an SA8000:2014 Certification Exclusion List which can be found on their website at www.sa-intl.org.

10.1.2 The People’s Republic of China and its Special Administrative Regions of Macau and Hong Kong, as well as Taiwan, SHALL be treated as separate countries for the purposes of SA8000 Certification.

10.1.3 Excluded Countries: None. Reference SAI’s SA8000:2014 Certification Exclusion List for the most up to date exclusions. Note: Care should be taken when granting SA8000 certification where certain issues are made illegal by country law.

10.1.4 Excluded Activities: Reference SAI’s SA8000:2014 Certification Exclusion List for the most up to date exclusions. SA8000 certification SHALL not be permitted in Maritime Activities covered by the MLC sector. See the definition for Maritime Activities.

10.1.5 Organisations without active operations [i.e. Shell Companies] are prohibited from being certified to SA8000.

a) Therefore any organisation that applies for SA8000 certification SHALL have been engaged in its stated business for at least 6 months prior to its application for SA8000.

b) The organisation that is to be certified SHALL have active contracts with its customer(s).

c) The CB SHALL maintain evidence in the client file to demonstrate that the client organisation is still active.

10.1.6 SA8000 certification SHALL be valid for a single organisation within a single site or location, or a commonly owned and managed (multi-site) group of facilities at multiple locations within a single country. Multi-site certification across multiple countries SHALL NOT be permitted.

10.1.7 Scope of certification: Details on the development and agreement of the scope of an SA8000 organisation are defined below with additional guidance provided at www.saasaccreditation.org/accreditation-requirements

a) The geographic boundaries of the scope SHALL be clearly defined.

b) The scope of a single SA8000 certificate SHALL cover all processes, properties and operations of a continuous process or premises. It SHALL be assured that all legal entities that are involved in the continuous processes (as described on the SA8000 Certification Certificate) are to be considered within the planning throughout the entirety of the SA8000 certification cycle.
Note: For example, in a situation with several assembly lines, all must be audited for certification. Similarly, in a continuous process of fabrication and finishing and packaging, the entire process must be compliant in order for certification to be granted.

c) The scope SHALL be clearly identified on the SA8000 certificate and include the nature of the organisation in terms of the products and/or services it provides, exactly the business information for which a client is certified, as well as its physical address(es). If a multi-site certificate is involved, all addresses SHALL be defined on the certificate, be publicly available, and reported to SAAS.

d) The scope SHALL include the entire legal entity’s structure and processes. In cases where a subcontractor is used by the certified organisation to deliver parts of its activities, the scope statement shall clearly specify that some processes are delivered by subcontractors and those parts are excluded from the scope.

e) Public information on the certification of an organisation SHALL be clear and understandable and specific as it relates to the scope of the certificate.

f) The CB SHALL certify an entire organisation and SHALL NOT certify personnel in only one department of a multi-department organisation and not the other(s). Departments are interrelated and personnel might move from one department to another.

g) On-site and off-site exclusive suppliers SHALL be treated as part of the organisation’s operation and included in the scope of the audit and audit day calculation. See definition of Exclusive Supplier.

h) With respect to SA8000 certification, working conditions for all personnel working on-site of the organisation seeking certification (including those employed by supplier organisations) are required to also comply with the requirements of SA8000.

i) Employment agencies SHALL include their contracted workers in their scope of certification.
Section 11

SA8000 Certification Requirements
11. SA8000 Certification Process Requirements


11.1.1 The initial certification audit SHALL generally be conducted in three stages as described in Figure 1.
11.1.2 Audit planning and execution SHALL take into account all personnel both on-site and off-site, including temporary and contract labour and homeworkers.

   a) The CB audit program SHALL address all elements of the standard at each location and assess all shifts (crews) covered by the scope of the SA8000 certificate.

   b) The rounding down to full-time equivalents is not permitted for SA8000 Certification. Every individual SHALL be taken as one person for audit effort planning irrespective of what hours they work per week and whether full or part-time.

11.1.3 Stakeholder engagement SHALL be performed as part of the SA8000 certification process. See Section 20 of this document to determine the calculation of audit days and inclusion of stakeholder engagement in the audit day calculation.

   a) Stakeholder engagement provides guidance, informed decision-making and a way to engage in meaningful dialogue with those parties with the most knowledge and stake in SA8000 activities. Stakeholder engagement allows auditors to engage with the community prior to the audit to do fact finding and assist in the assessment of the organisation. Formal and informal consultations are an effective means of both gathering information on possible problem areas and also encouraging local organisations to monitor an SA8000-certified organisation’s continual compliance. Such consultations reduce the risk that auditors will overlook a nonconformity, help encourage a constructive feedback loop and build confidence in the reliability of certification.

   b) The CB SHALL have a documented and implemented process to effectively obtain and maintain information about working conditions regularly gathered from regional interested parties, NGOs, trade unions, community organisations and workers. This information SHALL be used in audit planning and throughout the audit process.

   c) The steps in stakeholder engagement SHALL include: defining stakeholders, interacting with stakeholders, performing consultations, developing profiles, and ongoing and regular updates.

   d) Stakeholder engagement SHALL be conducted in a common sense approach for auditors to understand common concerns in a given geographic region. At minimum, annual consultation with stakeholders SHALL be conducted, with evidence of information collected.

   e) Auditors SHALL conduct local intelligence gathering while on-site or in a specific area for audits. This may include checking with the local community in the early morning of the Stage 1 audit and/or in the evening between audit days and at the time of an unannounced audit.

   f) CBs SHALL maintain records including notes and minutes from stakeholder consultations and other pre-audit research. Client files SHALL NOT contain a generic boiler plate statement about stakeholder consultation but SHALL include actual recorded evidence of stakeholder consultation.
11.1.4 The initial certification (Stage 2) and recertification audits SHALL include the auditing of all shifts (crews). In addition to the Stage 2 audit, all shifts (crews) SHALL be seen at least once throughout the certification cycle through the use of surveillance audits.

a) Table 1 generally indicates the time of day and audit effort when at least one member of the audit team should audit the appropriate shift. Audits of night shifts SHALL include a focus on worker interviews and health and safety issues.

b) The basis of this table is to permit the audit day to be split to ensure that night and other shifts are audited at the appropriate time.

c) To enable an efficient audit at a site with multiple shifts, the auditor SHALL be authorized to shorten the daytime hours in an audit in order to perform the remaining hours for the audit during the night shift. The auditor SHALL NOT be required to audit eight hours during the day and also audit during the night shift.

<table>
<thead>
<tr>
<th>Shift Type</th>
<th>Nominal Working Hours</th>
<th>When To Audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Morning</td>
<td>06.00 to 14.00</td>
<td>During Normal Audit Day Of 09.00-17.00</td>
</tr>
<tr>
<td>Afternoon</td>
<td>14.00 to 22.00</td>
<td>During Shortened Audit Day &amp; 3 Hours of 19.00-22.00</td>
</tr>
<tr>
<td>Night</td>
<td>22.00 to 06.00</td>
<td>During Shortened Day &amp; 3 Hours of 00.00-03.00</td>
</tr>
<tr>
<td>Twi-light</td>
<td>17.00 to 21.00</td>
<td>During Shortened Audit Day &amp; 3 Hours of 18.00-21.00</td>
</tr>
<tr>
<td>Day 1</td>
<td>06.00-16.00</td>
<td>During Normal Audit Day Of 09.00-17.00</td>
</tr>
<tr>
<td>Day 2</td>
<td>08.00-18.00</td>
<td>During Normal Audit Day Of 09.00-17.00</td>
</tr>
<tr>
<td>Day 3</td>
<td>09.00-17.00</td>
<td>During Normal Audit Day Of 09.00-17.00</td>
</tr>
</tbody>
</table>

Table 1 - Shift Pattern Audit Effort

11.1.5 The entire management system and associated performance elements for SA8000 SHALL be assessed at every certification (Stage 2 site audit) and recertification. The entirety of the management system SHALL also be assessed throughout the certification cycle through the use of surveillance audits.

11.1.6 The certification cycle SHALL be based upon the dates of the initial certification decision. The time interval between initial certification and recertification or between two recertification audits SHALL NOT exceed three years from issue of the certification decision. There SHALL be no gaps before the new certification cycle (recertification) commences.
11.1.7 Through the use of surveillance audits, the SAAS-accredited CB SHALL monitor the ongoing performance of its SA8000 Certified Clients against the requirements of SA8000 as per Section 16 and Table 12 – Minimum Number and Recommended Timeframe of Unannounced Surveillance Visits - 6 Monthly Surveillance in this document.

11.1.8 Each CB SHALL have documented procedures for selecting and appointing the audit team for each audit, including the requirements and attributes of the audit team leader and the overall competence needed to achieve the objectives of the audit. If there is only one auditor, the auditor shall have the competence to perform the duties of an audit team leader applicable for that audit.

11.1.9 SA8000 auditor and allied expert personnel appointed to audit teams, between them, SHALL reflect the totality of competencies, location-specific knowledge, language skills and cultural knowledge required to conduct all SA8000 audits performed by the CB (see Procedure 201B for explicit requirements, details and team composition). These skills SHALL include:

a) knowledge of issues applicable to the location (laws/regulation and other demands/norms applicable to a specific location - including industry rules or norms);

b) knowledge of applicable language(s)/dialect(s) - written and spoken;

c) knowledge of prevailing cultural norm(s) of management and workers - this would include gender (as a subset of culture) and other potential differences (such as caste, immigrant workers and many other broadly or narrowly applicable issues).

11.1.10 Social Fingerprint SHALL be fully integrated into the SA8000 audit process as described in the Procedure 200A (Audit Requirements for Accredited Certification Bodies For Social Fingerprint).

11.2 Audit Disruptions

11.2.1 Each CB SHALL develop and maintain a general procedure that addresses issues that can occur during an audit such as, but not limited to: attempted bribery; power outage; fire; serious accident; denied access to any part of the premises; denied access to records; denied access during an unannounced audit; and other such matters. This procedure SHALL address auditor process and the circumstances under which an audit SHALL be terminated.

11.2.2 This procedure SHALL delineate the action that the CB auditor(s) SHALL be required to take if such a disruption occurs. All disruptions and/or disturbances during audits SHALL be documented and records kept in the client file.
11.2.3 This procedure SHALL detail the steps to report, investigate and address situations of attempted bribery. Please also see the definition of Breach of Ethical Standards in this document and additional CB process requirements found in Procedure 201A.

a) Process requirements: If the attempt occurs during an SA8000 audit, SA8000 auditors SHALL follow the CB’s policies and issue a Critical Non-Conformity to the organisation.
Section 12

General Audit Planning
(Excluding Audit Effort)
12. General Audit Planning (Excluding Audit Effort)

12.1 Audit Plans - (ISO/IEC 17021-1:2015 Clause 9.2)

12.1.1 Every audit SHALL have an audit plan.

   a) For announced audits, the audit plan SHALL be sent to the client at least 2 weeks prior to the audit and SHALL include the name of and summary of background information on each member of the audit team.

   b) For unannounced audits, the CB SHALL develop an audit plan and maintain it, confidentially, until the auditor arrives on-site and presents it at the opening meeting of the audit. In order to facilitate the unannounced audit, the CB SHALL provide information on the expected audit plan to the client at the end of the previous audit or at a later date, but absolutely not in any way that might inform the client as to when the unannounced audit will take place.

   c) The audit SHALL be planned so as to fully evaluate the effectiveness of the SA8000 management system and related performance criteria through evidence-based assessment.

   d) The audit plan SHALL ensure for all audits, that the composition of the audit team reflects the gender balance of the employees and industry sector of the client unless justified and authorized by CB management.

12.1.2 The audit plan SHALL be adapted to the processes and working environment of the organisation being assessed and SHALL include all requirements of the organisation's social management system (for initial and recertification audits) and associated performance elements and cover all shifts within the audit cycle.

12.1.3 The plan SHALL be developed in light of information gathered from local and regional experts, stakeholders, community members, NGOs and Trade Unions, information which SHALL be gathered and recorded in advance of the audit.

12.1.4 The audit plan SHALL indicate the need for the certified organisation to provide their calculations of living wage and the lowest wage paid to any employee in the organisation, adjusted to gross or net. The certified organisation shall also supply evidence of the legally required minimum wage (that is the lowest wage permitted by law or by a special agreement such as one with a labor union).

12.1.5 Relevant records of internal communication of audit team members, the client and external stakeholders related to the individual client and audit SHALL be maintained.

12.1.6 Audit records SHALL contain a copy of the AS AUDITED plan that confirms the paths and sequence of each audit. This can be a hand-marked copy of the audited plan as presented at the opening meeting.
12.1.7 The CB SHALL ensure that the client is informed (for every type of audit except those unannounced) of their right to object to any member of the audit team as required by ISO 17021-1:2015, 9.2.3.5. Records of this communication SHALL be maintained by the CB.

12.1.8 In addition to the requirements in ISO 17021-1:2015, 9.2.3.2: Audit plans SHALL include the following information in Table 2, as applicable, as a minimum:

- a) Auditors Names.
- b) Experts Names.
- c) Translators Names.
- d) Other persons attending the audit, e.g. CB, SAAS, or others.
- e) Client contact details including organisation name; address; main contact.
- f) SA8000 management representative; SA8000 workers representative; Trade Union representative; Social Performance Team Member(s).
- g) Other reps as appropriate (such as OHS rep; HR manager; Payroll manager).
- h) Locations to be audited (except in the case of multi-site sampling).
- i) Shifts operated and to be audited.
- j) Approximate time of each audit activity and date. This SHALL also include the time allocated to perform the SF IE.
- k) Audit site demographics related to number, gender and language spoken for: workers and managers, contract services suppliers and direct and indirect labor.
- l) Travel time to sites as appropriate.
- m) Indication of the expected number of worker and manager interviews.
- n) Language of audit.
- o) Statements on bribery policy, confidentiality and impartiality, both general statements and policies specific to the audit and audit team.
- p) List of documents to prepare for the audit.
- q) Statement on the need for senior management, workers representatives, SPT Team to be present at the opening and closing meetings.

**Table 2 - Audit Plan Details**

12.1.9 A series of template documents are available from SAAS and also downloadable from www.saasaccreditation.org/accreditation-requirements

12.1.10 See www.saasaccreditation.org/accreditation-requirements for guidance on percentage of time spent per audit activity for SA8000 on-site audits.
Section 13

Pre-Assessment and Initial Research
13. Pre-Assessment and Initial Research

13.1 Pre-Assessment Audit

13.1.1 Pre-Assessment audits are an optional service that can be provided by a CB. The CB SHALL have procedures for managing the pre-assessment process so as to reduce conflicts of interest and so as not to provide consulting during the pre-assessment audit.

13.1.2 Pre-assessment audits can be performed at the request of the client by the contracted CB. This request SHALL be documented in the client audit file.

13.1.3 A pre-assessment audit SHALL ONLY be performed prior to the initial Stage 1 audit and SHALL NOT be performed in lieu of a Stage 1 audit. The pre-assessment SHALL be formally documented in an audit report and SHALL consist of non-binding findings with no recommended solutions. The time spent on a pre-assessment audit SHALL NOT be considered part of the Stage 1 and/or Stage 2 process.

13.1.4 Arranging training and participating as a trainer at a client’s organisation SHALL NOT be considered consultancy provided that, where the course relates to management systems or auditing, it is confined to the provision of generic information that is freely available in the public domain; i.e. the trainer SHALL NOT provide organisation-specific solutions.

13.2 Initial Research

13.2.1 All CB’s SHALL have a documented procedure that describes the criteria for accepting a client based on various risk factors including any geographical, ethical, and/or commercial basis. These criteria may include countries and business sectors from which they may choose to refuse applications.

13.2.2 Prior to accepting a client organisation for SA8000 certification, the CB SHALL check that the applicant does not have a recent or pervasive history of major unaddressed violations in any element of the SA8000 standard (including freedom of association) for at least six months before the Stage 1 audit.

   a) The process to obtain this information can include web-based research.

   b) The CB SHALL search diligently for local intelligence from within the CB and from external bodies such as regulatory agencies, trade unions, local stakeholders and community members.

   c) The results of this research process SHALL be documented and maintained in the client file and include justification as to why clients were taken on if they have a previous pervasive history of major unaddressed violations in any elements of the SA8000 standard.

13.2.3 The research process by the CB SHALL include, at a minimum:

   a) A determination of sufficient wage levels for the client location, as defined by SA8000 Element 8.1.

   b) A determination of present or past legal actions against the organisation.
c) Consultation to gather information about working conditions gathered from regional and local interested parties, NGOs, trade unions and workers. This process SHALL be included in the calculation of audit days as part of the preparation of the Stage 1 and Stage 2 audit for initial and recertification audits and, at minimum, 1 time per year for surveillance audits. See also section 11.1 in this document.

d) A determination of the languages spoken by personnel at the organisation, and the proportion speaking each. The CB SHALL record this information before accepting a client organisation for SA8000 Certification to ensure it has the capacity to communicate effectively with the majority of personnel.

e) A determination as to whether or not the client is currently or previously has been certified to SA8000 and, if so, reviews of those SA8000 audit and non-conformity reports. If the CB cannot make this determination, they SHALL confer directly with SAAS.

f) A determination as to whether or not the client organisation has had audits against other social codes of conduct and, if so, reviews of those audit reports.

g) An investigation of grievances, legal proceedings and other complaints for a period of time of at least six months before the Stage 1 Audit.

13.2.4 The CB SHALL have a documented procedure that describes how it undertakes the initial research process as described above.
Section 14

Stage 1 Audit
14. Stage 1 Audits

14.1 Stage 1 Assessment

14.1.1 The objective of a Stage 1 audit is as described below in Table 3.

| a) Review accuracy of the pre-audit questionnaire returned by the client organisation. | b) Familiarize the CB Lead Auditor with the issues pertinent to the client organisation. |
| c) Gain an understanding of the client’s SA system and its state of development. | d) Determine client’s awareness and recognition of the local norms, regulatory and legal requirements. |
| e) Review the client organisation’s method of determining a local Living Wage and the wages paid to workers. | f) Review and assess the client’s SA8000 management system documentation. |
| g) Agree to the list of documentation that must be made available by the client organisation for the Stage 2 Audit. | h) Evaluate the client’s location and site-specific conditions. |
| i) Undertake discussions with the client’s personnel to determine the preparedness for the Stage 2 audit. | j) Identify all parts of the organisation so the CB understands the structure of the organisation for proper determination of scope of the certificate. |
| k) Review the proposed allocation of resources for the Stage 2 audit against the draft audit plan and agree with the client on the details of the Stage 2 audit. | l) Evaluate if internal audits and management review are being planned and performed and to ascertain the organisation’s general conformity with the SA8000 Standard and Performance Indicator Annex. |
| m) Review previous labor, ethics, and other similar second and third party audit reports that are in the possession of the SA8000 certified or applicant organisation. The client SHALL make available any such audit reports within the previous three years and all SA8000 audit reports, if ever previously certified. | n) To confirm the date when the client declares that their SA8000 management system was fully operational. This date SHALL be recorded in the Stage 1 Audit Report. |

Table 3 - Objectives of a Stage 1 Audit

14.1.2 CBs SHALL have a documented procedure that describes how they perform an SA8000 certification Stage 1 audit that generally follows the steps as outlined in above and ISO 17021-1:2015 Clause 9.3.1.2 and includes the Social Fingerprint Independent Evaluation.

14.1.3 The Stage 1 audit SHALL be conducted during an on-site visit to the organisation. In the case of micro-enterprises (as defined in this document), an on-site Stage 1 audit may not be necessary. In such cases, the justification for not doing an on-site visit SHALL be recorded in the client file. Details SHALL be recorded describing the conduct of the remote Stage 1 audit.

14.1.4 The Stage 1 audit SHALL be normally of one to two audit day duration. If a Stage 1 audit goes beyond the maximum identified in the audit days table found in this document, the CB SHALL justify and record why the additional days for Stage 1 audit was found to be necessary. See Section 20 for audit day calculation.
14.1.5 The category of findings raised during a Stage 1 audit SHALL be:
   a) Risk of non-conformance.
   b) Observations.

14.2 **Stage 1 Audit Preparation**

14.2.1 Prior to the Stage 1 audit being performed, a pre-audit questionnaire SHALL be sent to the client organisation for completion. The questionnaire SHALL be returned to the CB and reviewed prior to the Stage 1 Audit taking place. (See also [www.saasaccreditation.org/accreditation-requirements](http://www.saasaccreditation.org/accreditation-requirements).)

14.2.2 For all Stage 1 audits, an audit plan SHALL be developed and sent to the client at least 2 weeks prior to the audit. The client’s Social Fingerprint Self-Assessment Score SHALL be factored into the Stage 1 audit planning process.

14.2.3 The Stage 1 audit SHALL be performed by the proposed Stage 2 Lead Auditor.

14.2.4 The Stage 1 audit steps SHALL generally be as described in Table 4.

<table>
<thead>
<tr>
<th>Audit Step</th>
<th>Audit Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Opening Meeting</td>
</tr>
<tr>
<td>2</td>
<td>Overview Tour (Including Canteen, Dormitory, Clinic, and Crèche, as appropriate)</td>
</tr>
<tr>
<td>3</td>
<td>Meeting with Workers Representative(s)</td>
</tr>
<tr>
<td>4</td>
<td>Meeting with Management to Confirm Understanding of SA8000, Confirm scope, Review Answers to SAAS Pre-Audit Questionnaire</td>
</tr>
<tr>
<td>5</td>
<td>Confirmation of Subcontract Labor on Site (Such As Cleaners, Canteen Staff, Refuse Collectors, Clinic Nurses And Doctors, Dormitory And Security Guards)</td>
</tr>
<tr>
<td>6</td>
<td>Availability of Documents</td>
</tr>
<tr>
<td>7</td>
<td>Review of Management System Documentation Including Management Review And Internal Audits</td>
</tr>
<tr>
<td>8</td>
<td>Confirm Stage 2 Audit Plan And Logistics for Audit</td>
</tr>
<tr>
<td>9</td>
<td>Closing Meeting</td>
</tr>
</tbody>
</table>

Table 4 - SA8000 Stage 1 Audit Steps

14.3 **Stage 1 Audit Outcomes**

14.3.1 Stage 1 audit findings SHALL be documented using the standard SAAS report template.

14.3.2 In determining the interval between Stage 1 and Stage 2 audits, consideration SHALL be given to the need for the client organisation to resolve areas of concern identified during the Stage 1 audit.
14.3.3 The CB SHALL justify the time period between the Stage 1 and Stage 2 audits with a documented explanation of how the client can move from Stage 1 to Stage 2.

14.3.4 No more than 6 months SHALL be allowed to pass between the end of the Stage 1 audit and the first day of the Stage 2 audit. If more time is required, the CB SHALL conduct an additional Stage 1 audit.

14.3.5 The Stage 1 Social Fingerprint IE score SHALL be factored into the Stage 2 audit planning process by the Stage 2 nominated Lead Auditor.
Section 15

Stage 2 Audits
15. **Stage 2 Audits**

15.1 **General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.3.1.3)**

15.1.1 The evaluation of the effectiveness of the SA8000 management system and associated performance elements SHALL include an assessment of how effectively the management system(s) is deployed, as evidenced by workplace policies and supporting evidence, including whether or not it is implemented within the organisation’s overall objectives.

15.1.2 An important part of the Stage 2 audit process is the conduct of interviews with workers and other personnel, as detailed in the Interview (15.8) section of this document.

15.1.3 CBs SHALL have a documented procedure that describes how it performs an SA8000 Certification (Stage 2) Audit that SHALL follow ISO/IEC 17021 clause 9.3.1.3 and generally follow the guidelines as outlined in Table 5, below. Please see Procedure 200A for integration of Social Fingerprint (Audit Requirements for Accredited Certification Bodies For Social Fingerprint) into the Stage 2 audit process.

<table>
<thead>
<tr>
<th>Audit Step</th>
<th>Stage 2 Audit Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Opening Meeting</td>
</tr>
<tr>
<td>2</td>
<td>Quick Overview Tour - including canteen, dormitory, clinic and crèche as appropriate</td>
</tr>
<tr>
<td>3</td>
<td>Confirmation of records required for interviews</td>
</tr>
<tr>
<td>4</td>
<td>Management Interviews</td>
</tr>
<tr>
<td>6</td>
<td>Workers Representative Interview &amp; Social Performance Team Interviews</td>
</tr>
<tr>
<td>7</td>
<td>Health &amp; Safety &amp; Working Conditions Tour - including in situ worker interviews and selection of production records</td>
</tr>
<tr>
<td>8</td>
<td>Subcontractor Interviews such as - cleaners, canteen staff, clinic nurses, doctors, dormitory managers and security guards</td>
</tr>
</tbody>
</table>
9  Employee Interviews - including staff, junior managers, first aiders, emergency response team members

10  Worker Interviews

11  Document & Record Review - Working Hours, Payroll, Living Wage, Cost Accounting

12  Pre-Closing Meeting Preparation

13  Closing Meeting

Table 5 - SA8000 Stage 2 Audit Steps

15.1.4 CBs SHALL undertake a full and fair evaluation of the client’s management system and its performance by determining the effectiveness of the client’s policies and procedures to demonstrate conformance to SA8000 requirements. The CB SHALL document evidence to show conformance to the elements beyond the policies and procedures created.

15.1.5 In extreme circumstances, an audit SHALL be terminated for lack of proper or adequate system implementation. In this case, a report SHALL be produced that covers the activities performed until the audit was terminated. If a Stage 2 audit is terminated, the audit SHALL be repeated from the very beginning of the Stage 2 process, if the applicant continues to seek certification.

15.2 General Audit Steps

15.2.1 General - (ISO/IEC 17021-1:2015 Clauses 9.4.) - The processes described in ISO/IEC 17021-1:2015 Clauses 9.4. SHALL be followed. The following offers some guidance on the audit steps of an SA8000 Stage 2 audit and also contains some mandatory requirements that all CBs SHALL follow.

15.3 Opening Meeting - (ISO/IEC 17021-1:2015 Clauses 9.4.2)

15.3.1 See www.saasaccreditation.org/accreditation-requirements for guidance on managing the opening and closing meeting.

15.3.2 Senior Management of the client organisation SHALL be requested to attend the Opening Meeting. As applicable, this SHALL include management representatives for health and safety; payroll; production schedules; time and attendance monitoring and labor & ethics/social accountability compliance.

15.3.3 Workers Representatives SHALL be requested to attend the Opening Meeting.

15.3.4 An attendance sheet SHALL be completed by all those who attend the Opening Meeting.

15.3.5 The CB’s Code of Ethics/Anti-bribery Statement SHALL be signed at the Opening Meeting by the organisation’s senior management.
15.3.6 The list of documents that are required to be submitted by the organisation for review by the CB SHALL be tabled.

15.3.7 The client SHALL be reminded of the need of the CB Auditors to take photographs and copies of documents for evidence of conformance but that the company can view all such photographs that the auditor may take at the end of the audit. The auditor SHALL also mention that photographs will not be taken of proprietary processes.

15.3.8 It SHALL be stated that workers will be selected at random to be interviewed and those who are SHALL be compensated in the same manner as if working at their regular job and will not be otherwise disadvantaged by being chosen for interview.

a) It SHALL also be stated that all those interviewed will be given a contact card with contact details for the auditors, CB and SAAS and that the organisation SHALL not require the interviewee to return the contact details to the organisation. Contact information SHALL also be available on all SA8000 information accessible to workers.

b) It SHALL be explained that the aim of distributing the contact cards is to provide additional assurance and communication means for the workers.

c) Cards will also be distributed randomly to workers during the organisation walkthrough.

15.3.9 It SHALL be stated that the CB team will choose an area during the overview tour where they will undertake confidential interviews of workers and no management may be present at the time of the interview.

15.3.10 If the organisation has retained a consultant to help it achieve SA8000 certification, the consultant may attend the Opening and Closing Meetings but may not represent the management of the organisation during the audit. If in attendance, they SHALL be silent observers.

15.4 Organisation Overview Tour

15.4.1 Auditors SHALL have access to all parts of the facility and SHALL confirm all buildings and locations that the organisation operates.

15.4.2 All areas of the organisation are to be briefly toured (including canteen, dormitory, clinic and crèche and all other employer-provided worker service facilities as appropriate). This SHALL include any areas under construction or renovation and any temporary work areas to verify:

a) Any changes from the Stage 1 Audit

b) Identification of potentially Hazardous Areas of Work

c) Identification of any major structural problems that are clearly evident

d) Potential Candidates for Interview.
15.4.3 The organisation SHALL provide a simple layout drawing/plan of their premises that includes all buildings and floors and canteen, dormitory, clinic and crèche and all other employer-provided worker service facilities as appropriate, including any areas under construction or renovation. This plan SHALL be filed as a hard or soft copy in the client file.

15.4.4 The CB’s SA8000 Lead Auditor SHALL identify and note the location of the posted copies of the SA8000 Standard during this tour to demonstrate that the organisation has openly displayed the SA8000 Standard.

15.5 **Organisation Health & Safety & Working Conditions Tour (OHS)**

15.5.1 This SHALL be the detailed tour where ALL areas of the organisation are viewed, particularly with respect to the need to comply with the SA8000:2014 Performance Indicator Annex.

15.5.2 In order for an organisation to be certified to SA8000, all facility and building areas must be accessed by auditors. This includes any areas under construction or renovation, in which case case auditors SHALL be provided with protective equipment as necessary.

15.5.3 During the OHS tour, it is expected that some workers will be chosen for a brief interview about general issues. The interviewees SHALL be taken to an area out of earshot of others but preferably still near to their workstation.

15.5.4 It is recommended that notes not be taken during these interviews but be made immediately after each interview. If notes are taken during the interview, the auditor SHALL explain to the worker the purpose of the notes, assure confidentiality to the interviewee and get their permission to take notes before the interview commences.

15.5.5 Production/process documents SHALL be copied for further review (a digital picture of the document is an acceptable alternative) for issues such as rest day working, overtime, etc.

15.5.6 Interviews of subcontractors may also be performed during the OHS tour.

15.6 **Confirmation of Documents & Records for Review**

15.6.1 The CB’s SA8000 audit team SHALL review the list of required documents and records given to the organisation and ascertain when they can expect to receive these so as to be of maximum use during the audit. The CB SHALL use the SAAS Standard Documentation Template see [www.saasaccreditation.org/accreditation-requirements](http://www.saasaccreditation.org/accreditation-requirements) for this purpose or their own equivalent document.

15.6.2 The personnel files, time and attendance and remuneration records SHALL be checked for all the interviewees chosen, as well as additional personnel as indicated in column 2 and 3 of Table 6, below.

15.6.3 The minimum number of personnel/worker records to be reviewed at Initial (Stage 2) and Recertification Audits SHALL be at least as per Table 6, below.
15.6.4 The CB’s SA8000 audit team SHALL review records for at least the last twelve months prior to the audit date but, for initial certification, records completed by the company before the declared initial start date of the CB Client Company’s SA8000 Management System implementation date SHALL not be cited as evidence of a Non-conformity.

15.7 Management System Review

15.7.1 SA8000 requires a management system approach to implementing social accountability with performance indicators to show the organisation meets the SA8000 standard consistently and that non-conformities are identified internally and corrected effectively.

15.7.2 The management system established by the organisation must follow the classic Plan-Do-Check-Act (PDCA) principle. The PDCA approach is relevant and applies to social, environmental, health and safety management systems.

15.7.3 If non-conformities are found through evaluation of performance criteria, those CARs SHALL be issued relative to gaps in the organisation’s management system.

15.7.4 An SA8000 Stage 2 certification audit SHALL fully evaluate the effectiveness of the SA8000 management system, its linkages, its requirements and its performance. This is facilitated through the use of the Social Fingerprint Independent Evaluation.

**Table 6 – Initial (Stage 2) Audit - No. Of Records To Be Reviewed**

<table>
<thead>
<tr>
<th>Number Of Employees</th>
<th>Total Individual Employees Interviewed</th>
<th><strong>Additional Worker Files To Be Reviewed</strong></th>
<th>Total Worker Files &amp; Wage Records Reviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-10</td>
<td>*</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>11-25</td>
<td>2</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>26-100</td>
<td>3</td>
<td>5</td>
<td>8</td>
</tr>
<tr>
<td>101-250</td>
<td>6</td>
<td>7</td>
<td>13</td>
</tr>
<tr>
<td>251-500</td>
<td>10</td>
<td>9</td>
<td>19</td>
</tr>
<tr>
<td>501-800</td>
<td>15</td>
<td>12</td>
<td>27</td>
</tr>
<tr>
<td>801-1200</td>
<td>15</td>
<td>15</td>
<td>30</td>
</tr>
<tr>
<td>1201-2000</td>
<td>20</td>
<td>17</td>
<td>37</td>
</tr>
<tr>
<td>2001-3000</td>
<td>20</td>
<td>20</td>
<td>40</td>
</tr>
<tr>
<td>3001-6000</td>
<td>25</td>
<td>25</td>
<td>50</td>
</tr>
<tr>
<td>6001-10000</td>
<td>25</td>
<td>30</td>
<td>55</td>
</tr>
<tr>
<td>10000-15000</td>
<td>30</td>
<td>35</td>
<td>65</td>
</tr>
<tr>
<td>15001-20000</td>
<td>30</td>
<td>40</td>
<td>70</td>
</tr>
</tbody>
</table>

* Note:
* As decided appropriate by the CB Lead Auditor.
** The files of all the workers interviewed SHALL be reviewed in detail. The other files SHALL be skimmed to look for any obvious anomalies that if found SHALL be investigated further.
15.7.5 The review of the management system of the client organisation SHALL be based on a process and risk management approach and include a review of the items in Table 7, below.

<table>
<thead>
<tr>
<th>a) Policies, Procedures and Records</th>
<th>b) Social Performance Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>c) Identification and Assessment of Risks</td>
<td>d) Monitoring</td>
</tr>
<tr>
<td>e) Internal Involvement and Communication</td>
<td>f) Complaint Management and Resolution</td>
</tr>
<tr>
<td>g) External Verification and Stakeholder Engagement</td>
<td>h) Corrective and Preventive Actions</td>
</tr>
<tr>
<td>i) Training and Capacity Building</td>
<td>j) Management of Suppliers and Contractors</td>
</tr>
</tbody>
</table>

Table 7 - Management System Elements

15.7.6 Photographs

a) To provide supporting evidence of audit outcomes, photographs SHALL be taken as a record of the audit.

b) The photographs SHALL provide positive reporting showing conformance (or non-conformance) to the elements of the Standard.

c) Photographs SHALL be taken of the following, as applicable and described in Table 8.

<table>
<thead>
<tr>
<th>1. SA8000 Standard(s)</th>
<th>2. Evacuation exits</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Organisation Building/ Premises</td>
<td>4. Evacuation Drills</td>
</tr>
<tr>
<td>5. Work Floor(s)</td>
<td>6. Warehouse</td>
</tr>
<tr>
<td>7. Dormitory</td>
<td>8. Supporting Facilities (e.g. sewage treatment, boiler, generator)</td>
</tr>
<tr>
<td>9. Canteen</td>
<td>10. Attendance Record System</td>
</tr>
<tr>
<td>11. Chemical Storage Area</td>
<td>12. Work-In-Progress</td>
</tr>
<tr>
<td>15. Fire Fighting Equipment</td>
<td>16. Best Practice</td>
</tr>
<tr>
<td>17. All Organisation’s documents reviewed as a part of the management systems</td>
<td></td>
</tr>
</tbody>
</table>

Table 8 - Photographs Required

Note: Other than identified above, photographs should be kept to a minimum and not include those of proprietary processes or individual workers. If the client organisation refuses permission to take photographs this SHALL be clearly stated in the audit report.
15.8 Interviews

15.8.1 Management interviews

a) Discussions will be held to establish the general thoughts of the management of the organisation with respect to the implementation by the organisation of their SA8000 management system.

b) The Pre-Audit Questionnaire will be reviewed with the management of the organisation to ensure that all information is current and accurate.

c) The CB SHALL use the SAAS Standard Interview Template see www.saasaccreditation.org/accreditation-requirements for this purpose or their own equivalent document.

15.8.2 General personnel interviews (including staff and junior managers, first aiders, firemen and members of the Social Performance Team)

a) Discussions will be held to establish the general thoughts and awareness of the personnel of the organisation with respect to the implementation by the organisation of their SA8000 management system.

b) Interviews with the members of the SPT shall focus on implementation of the SPT’s responsibilities, risk assessment, ongoing monitoring, internal audits, communication, complaint management and resolution, and commitment by Senior Management to the SA8000 Standard.

c) A representative number of personnel will be chosen by the CB Audit Team.

d) The CB SHALL use the SAAS Standard Interview Template or their own equivalent document for this purpose.

15.8.3 Workers representative(s) interview

a) Discussions will be held to establish the thoughts of the Workers representative(s) with respect to the implementation by the organisation of its SA8000 management system, general working conditions, Freedom of Association (FOA), and other elements of the Standard within the organisation.

b) The Workers representative(s) SHALL be asked to describe any Collective Bargaining Agreement (CBA) in place in the organisation.

c) The Worker Representative(s) SHALL be asked to describe the election process followed when electing such representative(s).

d) The CB SHALL use the SAAS Standard Interview Template for this purpose or their own equivalent document.

15.8.4 Confidential Worker Interviews – it SHALL be remembered at all times that the purpose of worker interviews is to obtain information that may act as a signpost to issues that require further examination by the SA8000 auditor.

a) The results of discussions from worker interviews are generally anecdotal. Information obtained from worker interviews SHALL be noted and brought forward for further
investigation throughout the current and future audits. If significant corroborating testimony or other evidence does not support information obtained during worker interviews, the CB SHALL institute off-site worker interviews and/or unannounced audits to identify further evidence to see if a non-conformity exists.

b) Workers SHALL be interviewed in a confidential setting without any supervision or management personnel present. If a trade union exists, the trade union representative shall be permitted to attend the interview at the request of the interviewee.

c) The CB SHALL maintain a list of interviewees. This list SHALL NOT be shared with the client organisation/management. This list SHALL be used to ensure that different individuals are interviewed during subsequent audits or to do follow-up interviews at future audits, and the list of those interviewed SHALL be provided to the auditor prior to each audit.

d) All interviews conducted by the SA8000 auditor SHALL include a verification of information regarding how the workers can communicate with the CB and SAAS regarding their concerns, or any additional information related to the audit. The auditor SHALL provide workers with the necessary contact information or alternatively, ensure that such information is made available to the workers by the CB’s client through appropriate methods. Auditors shall ensure that CB contact information is available and listed in a prominent place such as the time and attendance recording location, dormitory or canteen at the certified organisation. Contact information SHALL also be given out by CB Auditors to workers chosen at random during the factory tour.

e) The number of workers interviewed is as per Table 9 – Initial (Stage 2) Audit Number of Workers To Be Interviewed.

| Initial (Stage2) & ReCertification Audit - Workers To Be Interviewed & Hours To Be Spent On Interviews |
|---|---|---|---|---|
| Column 1 | Column 2 | Column 3 | Column 4 | Column 5 |
| Number Of Employees | No. Of Individual Interviews | No. Of Group Interviews | Total Employees Interviewed | **Effective Time Spent On Interviews in Hours** |
| 1-10 | * | * | * | 40 mins |
| 11-25 | 2 | 1 Group of 3 | 3 | 1 |
| 101-250 | 6 | [3 Groups of 2] | 15 | 4 |

* Note: 
* As decided appropriate by the CB Lead Auditor.
** Approximate time.

Table 9 – Initial (Stage 2) Audit Number of Workers To Be Interviewed
f) The format for the number of workers interviewed is, at minimum, as per Table 9 – Initial (Stage 2) Audit Number of Workers To Be Interviewed below. If the auditor has reason to vary from the table provided, this SHALL be documented in the client file.

g) The total of personnel interviewed can be by a mixture of off and on-site interviews.

h) Off-site interviews SHALL be undertaken, at minimum, for clients based in highest risk countries. In this case, at least a minimum of 2 workers to a maximum of 10 workers SHALL be interviewed off-site. Off-site interviews should be at a location where workers feel comfortable to share their opinions about work conditions. Dormitories without security guards present, apartments shared by workers, and entertainment facilities can be good places to conduct interviews. Auditors can consult with local organisations trusted by workers for good locations.

15.8.5 Interview of on-site subcontract labour and suppliers

a) Discussions SHALL be held to establish the general thoughts and awareness of the personnel of on-site subcontractors and suppliers (such as cleaners, canteen staff, construction crews, clinic nurses and doctors, dormitory and security guards).

b) Auditors SHALL identify the existence of migrant, temporary, contract and homeworker labourers and maintain interview questions particular to those labour situations.

c) A confirmation of understanding of their own employer’s SA8000 management system SHALL be confirmed.

d) Subcontract labour personnel and suppliers SHALL also be asked about the organisation’s working hours. Corroborating evidence can be obtained from clinic and security guard logs.

e) A representative number of personnel SHALL be chosen by the CB Audit Team from each subcontractor; working hours, remuneration, discrimination, and employment contracts SHALL be examined.

f) The CB SHALL use the SAAS Standard Interview Template for this purpose or their own equivalent document.

15.9 Closing Meeting - (ISO/IEC 17021-1:2015 Clauses 9.4.7)

15.9.1 Pre-Closing Meeting

a) The CB Lead Auditor may decide, at their discretion, to hold a pre-closing meeting with the client organisation’s SA8000 Management Representative and Social Performance Team so as to ensure the client has a clear understanding of the outcome of the audit.

b) The purpose of such a meeting is to confirm the SF IE score and audit findings (NC’s) by the audit team prior to the formal Closing Meeting.

c) At the end of the pre-closing meeting the audit findings may be discussed in detail and AGREED with the company management representatives and other persons that the CB Lead Auditor believes should attend. This is to save time at the Closing Meeting where any findings can just be summarized.
d) If the auditor chooses to not hold a pre-closing meeting, the auditor shall ensure that SF IE score and audit findings have been communicated prior to the closing meeting.

15.9.2 See www.saasaccreditation.org/accreditation-requirements for guidance on opening and closing meeting.

a) Senior Management SHALL be requested to attend the Closing Meeting. This SHALL include those responsible for health and safety; payroll; production schedules; time and attendance monitoring and Labor & Ethics/Social Accountability compliance.

b) Workers Representatives and Representatives of the Social Performance Team SHALL be requested to attend the Closing Meeting. If the Workers Representative is not in attendance, this SHALL be noted in the audit report.

c) An attendance sheet SHALL be completed by all those that attend the Closing Meeting. For those attending virtually, the auditor SHALL record their names.

d) If a consultant has been retained to help the organisation achieve SA8000 certification, the consultant may attend the Closing Meeting as an observer only.

e) The result of the audit, including the outcome of the Social Fingerprint Independent Evaluation (as applicable), SHALL be verbally summarized with translation into the language(s) of the workers representative(s) present if different from the language used.

f) The client shall be informed if an additional full audit or limited audit (on-site) or documented evidence (to be confirmed during future audits) will be needed to verify effective correction and corrective actions of any Critical or Major Non-Conformity raised.

g) To verify on-site, the effectiveness of a CAP produced by the CB Client Organisation as response to the raising of a Major nonconformity.

h) Best practice demonstrated by the organisation SHALL be highlighted by the auditor.

i) The auditor SHALL leave a copy of any NC reports raised during the audit with the organisation.
Section 16

Surveillance Audits
16. Surveillance Audits

16.1 General - (ISO/IEC 17021-1:2015 Clauses 9.6.2)

16.1.1 The CB SHALL have a documented procedure that describes how it undertakes surveillance audits.

16.1.2 Unless otherwise described in this document, surveillance audits of SA8000 certified organisations SHALL be planned as described in Figure 2 (with variance, as noted in clause 16.2 for unannounced audits). The Social Fingerprint Independent Evaluation SHALL be implemented at different points within the certification cycle, as per Procedure 200A:2015 (Audit Requirements for Accredited Certification Bodies for Social Fingerprint).

![Figure 2 - Surveillance during the SA8000 Certification Cycle](image)

16.1.3 All SA8000 certified organisations SHALL undergo periodic surveillance audits. The surveillance scheduling SHALL include at least those issues defined in ISO/IEC 17021-1:2015 clause 9.6.2.
16.1.4 The amount of time required for the SA8000 audit effort SHALL be as described in Table 16 in section 20.5.

16.1.5 As per ISO/IEC 17021, clause 9.1.3.2, the certification cycle SHALL begin with the certification or recertification decision. The frequency of the surveillance audits SHALL be determined as per the requirements in this section.

a) The date of the first surveillance audit following the initial certification or recertification decision SHALL be not more than 6 months from the last day of the initial Stage 2 or recertification audit.

b) If a CB takes more than 6 months to make a certification or recertification decision after the last day of the initial stage 2 or recertification audit, the CB SHALL undertake an on-site audit of the client no later than 12 months from the last day of the Stage 2 audit. The CB SHALL also provide an explanation for the delay in rendering a certification decision.

16.1.6 Within the initial certification cycle, the frequency of surveillance SHALL be determined as follows:

a) All SA8000 certified organisations SHALL undergo a surveillance audit every six months, excepting those qualifying under 16.1.6 b) below.

b) An exception to this policy, and only at the request of the certification client within the initial certification cycle: after the first six month audit and the second [twelve month (unannounced)] audit, micro-enterprises (as defined in this document) may be allowed to move to an annual surveillance schedule in lower risk countries only (see note below). If the number of personnel increases to more than ten within the initial certification cycle, the frequency of the required SA8000 surveillance audits SHALL revert to a 6 monthly semi-annual surveillance schedule for that client. All moves to Annual Surveillance SHALL be documented and justified in the client file.

Note: This exception SHALL ONLY be applied to organisations in the lower risk category as identified in the SA8000 Certification Country Risk Assessment Process (see www.saasaccreditation.org/accreditation-requirements and Certification Country Risk Assessment Process in the Definitions section of this document).

c) Delays in surveillance audit scheduling: Any delay due to a client request SHALL be documented and authorized only in unusual circumstances. Such circumstances include civil unrest, flooding etc. If the request from the client is deemed to be reasonable, and the delay is between 3 and 6 months (but no more than 6 months), then the client’s certificate SHALL be suspended until such a time that the required surveillance can take place.

d) The CB SHALL only restore a suspended certificate if the issue(s) that resulted in the suspension has been resolved. Failure to resolve the issues that resulted in the suspension in line with Paragraph 16.1.6 c) SHALL result in withdrawal of SA8000 certification.

e) If the delay due to a client request is greater than 6 months, then the client’s certificate SHALL be cancelled. Records of a suspension or cancellation SHALL be documented and maintained by the CB.

f) Under no circumstance SHALL two surveillance audits be combined as one.
16.1.7 For recertification applicants, at the request of their client, prior to undertaking recertification, the CB SHALL conduct an analysis of the SA8000 client in order to determine whether or not the organisation could be a candidate for less frequent surveillances. Based upon that analysis, the CB SHALL determine whether or not the SA8000-certified organisation is eligible for annual surveillances or must continue with semi-annual surveillances in the new certification cycle.

a) This analysis SHALL include a review of the organisation’s performance history throughout its previous certification cycle and the associated risk with reducing semi-annual surveillances.

b) At minimum, the CB SHALL evaluate the history of effectiveness of the organisation’s social accountability management system(s) as it considers moving the client to an annual surveillance schedule.

c) In addition to an effective management system, the client SHALL have demonstrated and documented improvement in that system and/or associated performance over the course of previous audits.

d) Only those clients in the lower risk countries may be a candidate for less frequent surveillances. Risk level is identified in the SA8000 Certification Country Risk Assessment Process (see www.saasaccreditation.org/accreditation-requirements and Certification Country Risk Assessment Process in the Definitions section of this document).

16.1.8 The CB SHALL document evidence of the analysis undertaken for each client and the conclusion reached based on this evidence. This evidence and subsequent conclusions SHALL be available for review by SAAS during accreditation audits.

a) For clients in their second and above certification cycle whose audits indicate continual improvement and who are in lower risk countries, as per www.saasaccreditation.org/accreditation-requirements, their surveillance audits may be reduced BUT the interval between each surveillance audit SHALL never be more than 365 days.

b) The process for this analysis and resultant decision on frequency of audits SHALL be documented in the CB’s certification procedures, including the identification of the person/position authorized to take this decision and the required qualification criteria for this person to take this decision.

c) Any reductions utilised by the CB regarding surveillance frequency as described in this document SHALL BE part of a documented risk analysis. Records of this risk analysis SHALL be maintained.

d) All decisions to move clients to Annual Surveillance SHALL be documented and justified in the client file.

16.1.9 At least one surveillance audit per year SHALL be scheduled to include an assessment of the organisation during "high season or rush" activities.
16.1.10 Each surveillance audit SHALL re-examine, in addition to the items mentioned in Table 10 below, additional SA8000 elements, so that all elements of the SA8000 Standard SHALL have been re-examined within each three year cycle. Although not all clauses of SA8000 will usually be audited during each surveillance audit, the items in Table 10 SHALL be audited on each surveillance audit. See the Procedure 200 Annex for integration of the Social Fingerprint Independent Evaluation into the surveillance process.

<table>
<thead>
<tr>
<th>a)</th>
<th>Verification of the number of personnel covered by the scope.</th>
</tr>
</thead>
<tbody>
<tr>
<td>d)</td>
<td>Worker training and worker awareness and understanding of the client’s SA8000 system in place.</td>
</tr>
<tr>
<td>c)</td>
<td>Response to any complaints received.</td>
</tr>
<tr>
<td>e)</td>
<td>Effectiveness of the root cause analysis, corrective and preventive action taken as a result of non-conformities raised during the previous audit (s) by the CB.</td>
</tr>
<tr>
<td>f)</td>
<td>Effectiveness of the health and safety management system in place, including number of incidents since the previous audit and analysis of any fatalities, any serious accidents, and any potentially hazardous events including fires, spills of toxic chemicals, explosions.</td>
</tr>
<tr>
<td>g)</td>
<td>Activities of the Worker Representative(s) since the previous audit.</td>
</tr>
<tr>
<td>h)</td>
<td>Analysis of working hours and remuneration (including during high season, if any) since the previous audit.</td>
</tr>
<tr>
<td>i)</td>
<td>Comparison between in the CB’s calculated current living wage and the process and number that is calculated by the certified organisation.</td>
</tr>
<tr>
<td>j)</td>
<td>Use of claims made by the client about their SA8000 certified status including the use of CB and SAAS SA8000 mark.</td>
</tr>
<tr>
<td>k)</td>
<td>Update of the client’s SA8000 audit records.</td>
</tr>
<tr>
<td>l)</td>
<td>Confirmation that the SA8000 Standard is posted in prominent location(s) including in field offices.</td>
</tr>
<tr>
<td>m)</td>
<td>A site tour of facilities SHALL be mandatory on every on-site audit.</td>
</tr>
</tbody>
</table>

**Table 10 - Mandatory Items to Be Audited During Surveillance Audits**

16.1.11 The client organisation’s social accountability target objectives and performance indicators as described in Table 11 SHALL be identified and maintained with the client’s records so as to show improvement in conformance over time.
Table 11 – Targets & Objectives to Be Audited Each Surveillance Audit

<table>
<thead>
<tr>
<th>Item</th>
<th>Each On-Site Surveillance Audit SHALL As A Minimum Include An Audit Of:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Changes to the Organisation’s SA8000 Management System</td>
</tr>
<tr>
<td>2</td>
<td>Changes to the Organisational Structure</td>
</tr>
<tr>
<td>3</td>
<td>Progress Made Against Any Time-Bound Non-conformities</td>
</tr>
<tr>
<td>4</td>
<td>Close Out of Non-conformities Raised At Previous Audit Including Review of Corrective Action Verification</td>
</tr>
<tr>
<td>5</td>
<td>Management Systems Including Management Review, Internal Audit, Corrective Action</td>
</tr>
<tr>
<td>6</td>
<td>Complaints And Grievances and the Organisation’s Response</td>
</tr>
<tr>
<td>7</td>
<td>Worker Training and Awareness of Health and Safety And the SA8000 Management System</td>
</tr>
<tr>
<td>8</td>
<td>Overall Health and Safety Risk Assessment Including Review of Incidents and Accidents</td>
</tr>
<tr>
<td>9</td>
<td>Worker Representative Role And Activities</td>
</tr>
<tr>
<td>10</td>
<td>Working Hours</td>
</tr>
<tr>
<td>11</td>
<td>Living Wage Calculation By The Organisation</td>
</tr>
<tr>
<td>12</td>
<td>Use of SA8000 Certification Logo</td>
</tr>
</tbody>
</table>

16.2 Unannounced Surveillance Audits

16.2.1 All CBs SHALL conduct unannounced audits during every three-year certification cycle. The minimum and typical timeframe is detailed in Table 12 below. These audits SHALL be strictly unannounced, with no advanced notice to the organisation and all feasible precautions taken to avoid the organisation being aware in advance.

16.2.2 The CB SHALL maintain a procedure for determining the frequency of the unannounced audits, including criteria for increasing the number of unannounced audits, criteria for scheduling unannounced audits, the process for developing the audit plan and information for planning and undertaking the unannounced audit. See www.saasaccreditation.org/accreditation-requirements for further guidance.

16.2.3 The frequency for unannounced surveillance audits is based on the country risk indicators as per the definition of Certification Country Risk Assessment Process in this document and information found at: www.saasaccreditation.org/accreditation-requirements. Additional consideration SHALL be based upon the ongoing performance of the certified organisation. The frequency of unannounced audits SHALL be increased as a result of complaints and reoccurring non-conformities. See also ISO/IEC 17021-1:2015 element 9.6.4.2.
16.2.4 At minimum, the CB SHALL use the country risk assessment criteria and unannounced guidance provided by SAAS at [www.saasaccreditation.org/accreditation-requirements](http://www.saasaccreditation.org/accreditation-requirements) as the basis for developing the frequency of unannounced audits for each country where they have SA8000 certified organisations.

a) The CB will generate an unannounced surveillance audit plan for each client [using Table 12 as guidance on the spacing of these audits based upon the risk ranking of the country]. Consideration SHALL also be based upon the CB’s knowledge of their client’s business and judgment as to when the unannounced audit is the most effective.

b) A Critical or Major CAR (or persistent issues) or the receipt of a complaint may necessitate the need for additional unannounced audits during the period of certification.

<table>
<thead>
<tr>
<th>Country Risk Type</th>
<th>Ranking Index</th>
<th>Surveillance 1</th>
<th>Surveillance 2</th>
<th>Surveillance 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highest</td>
<td>0-35</td>
<td>Unannounced</td>
<td>Unannounced</td>
<td></td>
</tr>
<tr>
<td>High</td>
<td>36-65</td>
<td>Unannounced</td>
<td>Unannounced</td>
<td></td>
</tr>
<tr>
<td>Lower</td>
<td>66-99</td>
<td>Unannounced</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permitted</td>
<td></td>
<td>± 1.5 Month</td>
<td>± 1.5 Month</td>
<td>± 1.5 Month</td>
</tr>
</tbody>
</table>

Table 12 – Minimum Number and Recommended Timeframe of Unannounced Surveillance Visits - 6 Monthly Surveillance

<table>
<thead>
<tr>
<th>Country Risk Type</th>
<th>Ranking Index</th>
<th>Surveillance 1</th>
<th>Months After Stage 2 Audit - 365 Day Surveillance +12 Months</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower</td>
<td>66-99</td>
<td>Unannounced</td>
<td></td>
</tr>
<tr>
<td>Permitted</td>
<td></td>
<td>± 1.5 Month</td>
<td></td>
</tr>
</tbody>
</table>

Minimum Number of Unannounced Surveillance Visits – Annual Surveillance

16.3 Monitoring Certified Organisation Performance and Non-Conformity Trends Each Surveillance Audit

16.3.1 The performance of the client organisation to the requirements of SA8000 SHALL be monitored during each surveillance audit over the certification cycle.

16.3.2 The CB SHALL have a method by which to highlight to each auditor the issues that have occurred at all previous visits to enable that auditor to monitor trends. An example of a simple overview matrix can be found at [www.saasaccreditation.org/accreditation-requirements](http://www.saasaccreditation.org/accreditation-requirements)
16.3.3 The CB SHALL also maintain a record of the client’s progress toward improvement in performance for each SA8000 element. These records SHALL be used as part of the process to decide whether or not the client can have their surveillance visits reduced to a 365 day cycle.

16.4 Surveillance Audit Worker Interview and Record Review

16.4.1 The number of worker files to be reviewed at each surveillance audit SHALL be as Table 13 - Required Number of Worker Files to Be Reviewed Per Surveillance Audit below.

16.4.2 The format for the number of workers interviewed is, at minimum, as per Table 14 below. If the auditor has reason to vary from the table provided, this SHALL be documented in the client file.

<table>
<thead>
<tr>
<th>Number Of Employees</th>
<th>Total Individual Employees Interviewed</th>
<th>**Additional Worker Files To Be Reviewed</th>
<th>Total Worker Files &amp; Wage Records Reviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-10</td>
<td>*</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>11-25</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>26-100</td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>101-250</td>
<td>2</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>251-500</td>
<td>3</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>501-800</td>
<td>5</td>
<td>4</td>
<td>9</td>
</tr>
<tr>
<td>801-1200</td>
<td>5</td>
<td>5</td>
<td>10</td>
</tr>
<tr>
<td>1201-2000</td>
<td>7</td>
<td>6</td>
<td>13</td>
</tr>
<tr>
<td>2001-3000</td>
<td>7</td>
<td>7</td>
<td>14</td>
</tr>
<tr>
<td>3001-6000</td>
<td>8</td>
<td>8</td>
<td>16</td>
</tr>
<tr>
<td>6001-10000</td>
<td>8</td>
<td>10</td>
<td>18</td>
</tr>
<tr>
<td>10000-15000</td>
<td>10</td>
<td>12</td>
<td>22</td>
</tr>
<tr>
<td>15001-20000</td>
<td>10</td>
<td>13</td>
<td>23</td>
</tr>
</tbody>
</table>

* Note:
* As decided appropriate by the CB Lead Auditor.
** The files of all the workers interviewed SHALL be reviewed in detail. The other files SHALL be skimmed to look for any obvious anomalies that if found SHALL be investigated further.

Table 13 - Required Number of Worker Files to Be Reviewed Per Surveillance Audit
<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number Of Employees</td>
<td>No. Of Individual Interviews</td>
<td>No. Of Group Interviews</td>
<td>Total Employees Interviewed</td>
<td><strong>Effective Time Spent On Interviews In Hours</strong></td>
</tr>
<tr>
<td>1-10</td>
<td>*</td>
<td>*</td>
<td>*</td>
<td>30 mins</td>
</tr>
<tr>
<td>1-25</td>
<td>1</td>
<td>[1 Group of 2]</td>
<td>3</td>
<td>30 mins</td>
</tr>
<tr>
<td>26-100</td>
<td>2</td>
<td>[1 Group of 2]</td>
<td>4</td>
<td>45 mins</td>
</tr>
<tr>
<td>101-250</td>
<td>3</td>
<td>[1 Group of 2]</td>
<td>5</td>
<td>1.5</td>
</tr>
<tr>
<td>251-500</td>
<td>4</td>
<td>[1 Group of 3]</td>
<td>7</td>
<td>2.5</td>
</tr>
<tr>
<td>501-800</td>
<td>5</td>
<td>[1 Group of 3]</td>
<td>8</td>
<td>4.0</td>
</tr>
<tr>
<td>801-1200</td>
<td>5</td>
<td>[1 Group of 2] &amp; [1 Group of 3]</td>
<td>10</td>
<td>5.0</td>
</tr>
</tbody>
</table>

* Note:
* As decided appropriate by the CB Lead Auditor.
** Approximate time.
Section 17

Recertification Audits
17. Recertification Audits

17.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.6.3)

17.1.1 The CB SHALL have a documented procedure that covers the performance of recertification audits, including the Social Fingerprint Independent Evaluation process.

17.1.2 The process as described in Stage 2 Audits above SHALL be followed for all Recertification Audits.

17.1.3 Every recertification audit SHALL reassess the effectiveness of the entirety of the policies and actions defined in the client organisation’s social management system and the overall effectiveness of that management system in its entirety, taking into consideration internal and external changes which may have affected the social management system.

17.1.4 The CB SHALL document the process used and outcome for deciding whether a Stage 1 audit is necessary for the recertification client. A Stage 1 audit may be deemed necessary if the certified organisation underwent a major change since the last certification audit such as a relocation, addition or deletion of locations of the organisation or the addition of business processes, shifts and/or number of personnel.

17.1.5 A new pre-audit questionnaire SHALL be sent to the client for completion and review at least one month before the recertification audit. The client SHALL also complete the Social Fingerprint Self-Assessment prior to the on-site recertification audit.

17.1.6 The audit effort for recertification SHALL be recalculated based on updated information to take into account changes to personnel numbers and other factors. Significant factors to consider SHALL include: the number of personnel, size and geographic spread of facilities, technology in the business services, shift patterns, labour sourcing, and/or a move from dormitories to living outside the factory.

a) In cases where there has been no significant change within the client organisation, the amount of audit effort SHALL be no less than 70% of that used for the initial (Stage 2) Audit (see Table 15). The organisation may then be seen as a candidate for moving to annual surveillance. Refer to the Surveillance Audits section in this document.

b) In the case of a significant change, the CB SHALL recalculate the number of audit days required based on 70% of what the initial audit should be with the new and updated changes (see Table 15). Six-month surveillance audit periodicity SHALL be maintained in such cases.

c) The recertification audit SHALL BE performed at least 3 months before the expiry of the client’s SA8000 certificate. Due to seasonal and other matters, this period may be reduced but in no cases SHALL there be a gap between the old and new certification cycles.
17.1.7 If an organisation has its SA8000 certificate withdrawn by a SAAS-accredited CB for any reason and the client decides, within 6 months, to re-establish its SA8000 certification with the same CB, then this may be affected in line with the Recertification Audit requirements found in this section of the document. Any requests to re-establish its SA8000 certification after 6 months, or with a new CB, SHALL be treated as a new application and an initial Stage 1 and Stage 2 certification audit shall be required.

17.1.8 If an organisation voluntarily decides to cancel its SA8000 certification and then decides within 6 months to re-establish its SA8000 certification with the same CB, then this may be affected in line with the Recertification Audit requirements found in this section of the document. Any requests to re-establish its SA8000 certification after 6 months, or with a new CB, SHALL be treated as a new application and an initial Stage 1 and Stage 2 certification audit shall be required.
Section 18

Transfer Audits
18. Transfer Audits (ISO/IEC 17021-1:2015 Clauses 9.5.3.3)

[For further reference and guidance See - IAF MD 2:2007 - IAF Mandatory Document for the Transfer of Accredited Certification of Management Systems – Clauses 2.2 & 2.3]

This Section 18 specifically relates to Transfer Audits. If a CB receives a request for certification from any previously SA8000 certified client, even if they are not treating this request as a transfer audit, then that CB SHALL formally confer with SAAS to ensure that the client has a clean certification history.

18.1 General Requirements

18.1.1 From time to time an organisation certified to SA8000 by a SAAS-accredited CB may decide to change its chosen CB. Although the preferred time of such a change is at the end of the 3-year certification cycle, if an organisation elects to change its CB and to continue certification to SA8000 at any point, then the steps as below SHALL be followed.

18.1.2 All SAAS-accredited CBs SHALL have a documented procedure that describes how they affect transfers of SA8000 certification.

18.1.3 In all cases, the new CB SHALL obtain a copy of, at minimum, the last 2 SA8000 audit reports produced by the previous CB for review. If these reports are not available (from either the client or the former CB, or with assistance from SAAS) then a transfer CANNOT take place and the client SHALL be considered a new client and an initial certification Stage 1 and Stage 2 audit SHALL be conducted.

18.1.4 SAAS-accredited CBs SHALL provide a copy of their last two audit reports of a client that wishes to transfer to another SAAS-accredited CB at the request of that CB.

Note: It is an accreditation requirement (See SAAS Procedure 201A) that upon the transfer of SA8000 certification from one SAAS-accredited CB to another, that the former CB provides copies of their last two audit reports to the new CB along with any concerns that they may have about that client’s ability to meet the requirements of SA8000 in a consistent manner.

18.1.5 For transfer during or at the end of the certification cycle (i.e. a live and current SA8000 certificate exists), the steps as detailed below SHALL be followed in sequence, before any transfer can occur:

a) The new CB SHALL be accredited by SAAS for the country of the transferee.

b) The existing client certificate SHALL be valid, with no open critical or major non-conformities. Organisations whose SA8000 Certificate has expired ARE NOT eligible for this Transfer process and shall be treated as new clients.

c) If open critical or major NCs exist, no transfer audit may be undertaken. If the client is currently suspended with its existing CB, a transfer may not take place. Any open minor non-conformities SHALL be addressed by a corrective action plan.

d) The new CB SHALL formally notify SAAS (and have received an affirmative reply in writing) of the transfer activity upon scheduling and prior to the on-site audit so SAAS may provide input on any...
known issues or outstanding complaints and/or concerns about the client.

e) The new CB SHALL perform and document a review of, at minimum, the 2 most recent SA8000 audit report(s) and all non-conformity findings issued by the former CB, including those previously closed out.

f) The new CB SHALL perform and document a basic document review that includes the key indicators of the social management system performance.

g) The new CB SHALL perform and document an on-site audit equivalent to a recertification audit to effect a transfer of certificate; a Social Fingerprint Independent Evaluation shall be conducted as per the recertification requirements.

h) A new certification cycle shall commence with the issuance of a new SA8000 certificate to a transfer client.

18.1.6 Clients certified by organisations not accredited by SAAS are not considered recognized, valid SA8000 certificate holders. Therefore, those clients SHALL NOT be considered eligible to undergo the transfer process and initial certification audits SHALL be conducted. However, the CB SHALL read any and all social audit reports available. The accredited CB SHALL also report to SAAS any such clients that have received unaccredited SA8000 certificates so SAAS may investigate the organisation issuing unaccredited SA8000 certificates. The only exception to this prohibition SHALL be applicant CBs undergoing the accreditation process with SAAS. See Procedure 201A for details on the issuance of unaccredited SA8000 certificates by applicant CBs.
Section 19

Special Audits
19. Special Audits
19.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.6.4)

19.1.1 The CB SHALL have a documented procedure that covers the performance of special audits with the possible need for access to the CB client’s premises (that may be announced or unannounced) included in the contractual agreement between the CB and their client.

19.1.2 The CB SHALL document in the client file the reason for the Special Audit, the process used and the outcome of the decision of the Special Audit.

19.1.3 Types of Special Audits. Special audits are typically performed for the following reasons:

   a) Extension/expansion of a client organisation’s scope of SA8000 certification.

   b) To investigate possible auditor bribery.

   c) To investigate a complaint, whether generated internally, from a stakeholder, from a client organisation or from SAAS.

   d) As part of a calibration/duplicate audit process.

   e) To verify on-site, the effectiveness of a CAP produced by the CB Client Organisation as response to the raising of a Critical or Major nonconformity.
Section 20

Audit Effort – Single Site
20. Audit Days – Single Site

20.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.1.4)

20.1.1 The overall audit time expressed in auditor days taken to audit an organisation against the requirements of the SA8000 Standard includes time to ensure adequate stakeholder engagement, remote auditing activities (including planning of the audit, review of the preparatory documents, writing the report and managing the general aspects of the job) as well as performing the on-site audit.

20.1.2 The CB SHALL calculate the time to spend on the audit by factoring in the sector complexity, perceived risk, country risk category (as determined by the SAAS Certification Country Risk Assessment Process), number of personnel, and off-site worker interviews to be conducted, where appropriate. The IAF/ISO approach is useful and CBs SHALL review IAF MD 5:2013 for guidance on risk assessment and audit duration. However, the document itself cannot be fully adopted when certifying organisations to SA8000 as it is not possible to use the full-time equivalent approach for social audits.

20.1.3 Particular attention SHALL be paid when calculating the auditor days for the on-site audit as the on-site audits are the most critical phases in the entire certification process and allows the auditor to assess full compliance to the SA8000 Standard Elements.

20.1.4 Table 15 defines the MINIMUM and AVERAGE audit days for the stages of the initial audit. In some cases more audit days will be allocated by the CB.

20.1.5 The number of personnel in the organisation for use with the audit day table SHALL be calculated considering the total number of personnel (including seasonal, part-time and temporary workers, indirect workers, and subcontractors and on-site suppliers) paid by the client, either directly or through an employment agency or an on-site subcontractor.

a) Calculation of personnel SHALL be based on totals during the high season.

b) Calculation of personnel SHALL not be reduced by converting part-time personnel into full-time equivalents.

c) Calculation of personnel SHALL include on-site and exclusive suppliers, including those personnel supplied by a private employment agency. Personnel provided by such suppliers SHALL be included as part of the scope of the SA8000 audit (and hence audit day calculations) rather than the control of suppliers clause of SA8000.

20.2 Single Site Initial Certification Audit Effort

20.2.1 The audit effort used for SA8000 Initial Certification Audits SHALL be as Table 15.
Table 15 - Single Site Initial Certification Audit Effort in Days

20.2.2 When using Table 15, the following should be taken into account.

a) All activities (excluding preparation, remote auditing activities and audit reporting) are performed on-site.
b) Stage 2 preparation time includes research, audit Planning, living wage calculations and
stakeholder consultation.

c) The use of translators and interpreters, in most cases, SHALL necessitate additional time (See ISO
17021:2015 Clause 9.1.4.4). If a translator is used, then the CB SHALL justify the number of audit days
used.

d) An audit performed for the first time in a new country for the CB may necessitate additional time.
The CB SHALL justify the number of audit days used for the certification of an organisation in a new
country.

e) Fractionalization of prescribed audit days resulting in half days may occur as per the audit day
tables found in this document. As a result, half day audits are allowed at those SA8000 certified
organisations under the SAAS Procedure 200.

20.2.3 No reductions in audit days are permissible for any reason except for organisations that have
progressed from the BSCI Code of Conduct Program to SA8000 certification, as described in Clause
20.3.1 below. This exception is applicable due to the oversight activities performed by of the BSCI
system.

20.2.4 An audit day SHALL be defined as a full normal working day of 8 hours, excluding meals and breaks
and travel time to and from the audit, and travel time between facilities, if the organisation has for
two or more locations.

a) The number of audit days SHALL not be reduced by scheduling longer hours per work day. The only
exception is on days when shift work is being covered (see Table 1).

b) A hard copy of the CB’s audit plan SHALL be marked up by hand with the arrival times and
departure times of the SA8000 audit team and to show any changes to the planned audit paths. This
marked up copy SHALL be kept by the CB as an audit record.

20.3 BSCI Audit Days-Reduction

20.3.1 A MAXIMUM of 20% overall reduction in audit effort as described in Section 20 Table 15 MAY be used
if an organisation has been subject to a BSCI Code of Code Audit in the 6 months preceding the initial
Stage 2 SA8000 certification audit and has achieved an overall “A” [Outstanding] or “B” [Good] rating
for all performance areas under the BSCI Code Of Conduct audit rating system.

20.3.2 In order to apply this reduction, the CB SHALL have access to and SHALL review previous BSCI audit
reports.

20.4 Initial Audit Days for CB’s First Certification in a New Country

20.4.1 Prior to performing any SA8000 audit activity in a new country, the CB must apply for and be granted
an Expansion to Scope. See Procedure 201A for process details.
20.4.2 When performing the first SA8000 audit in a new country, the CB SHALL increase the audit days described in Table 15 by 20%.

20.5 **Single Site Surveillance Audit Effort**

20.5.1 Surveillance audits SHALL be scheduled as per the details in Section 16 above.

20.5.2 The number of days allocated to a surveillance audit SHALL be based on the Stage 2 initial certification audit days. In the case where an organisation has been the subject of a recertification audit and there were significant changes in the number or personnel or activities, then the surveillance audit effort SHALL be based on the new recalculated value.

20.5.3 A contract review SHALL be performed prior to each audit to understand changes in employment during the audit cycle and, as necessary, adjust the audit day effort. This SHALL be performed and documented as part of the audit planning at least 4 weeks ahead of the audit date (except for unannounced audits).

20.5.4 Table 16 provides the number of audit days required on-site per individual audit with fractionalization of the prescribed audit days being permitted.

<table>
<thead>
<tr>
<th>Number Of Employees</th>
<th>*6 Monthly Surveillance Effort Excluding On Site Reporting</th>
<th>6 Monthly Surveillance Effort Reporting Time</th>
<th>Total 6 Monthly Surveillance Effort Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-25</td>
<td>1</td>
<td>0.5</td>
<td>1.5</td>
</tr>
<tr>
<td>26-100</td>
<td>1</td>
<td>0.5</td>
<td>1.5</td>
</tr>
<tr>
<td>101-250</td>
<td>1</td>
<td>0.5</td>
<td>1.5</td>
</tr>
<tr>
<td>251-500</td>
<td>1.5</td>
<td>0.5</td>
<td>2</td>
</tr>
<tr>
<td>501-800</td>
<td>1.5</td>
<td>0.5</td>
<td>2</td>
</tr>
<tr>
<td>801-1200</td>
<td>2</td>
<td>0.5</td>
<td>2.5</td>
</tr>
<tr>
<td>1201-2000</td>
<td>2.5</td>
<td>0.5</td>
<td>3</td>
</tr>
<tr>
<td>2001-3000</td>
<td>2.5</td>
<td>0.5</td>
<td>3</td>
</tr>
<tr>
<td>3001-6000</td>
<td>2.5</td>
<td>0.5</td>
<td>3</td>
</tr>
<tr>
<td>6001-10,000</td>
<td>3</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>10,001-15,000</td>
<td>3</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>15,001-20,000</td>
<td>3.5</td>
<td>1</td>
<td>4.5</td>
</tr>
</tbody>
</table>

**Note:**

*Including a 0.25 Day Social Fingerprint IE when appropriate.*
Section 21

Multiple Sites
21. Multi-site Certification Audits

21.1 Background and Context
Note: See the following documents for guidance:
- IAF MD 1:2007 - IAF Mandatory Document for the Certification of Multiple Sites Based on Sampling
- IAF MD 5:2015 Determination of Audit Time of Quality and Environmental Management Systems
- IAF MD 19:2016 - IAF Mandatory Document For The Audit and Certification of a Management System operated by a Multi-Site Organization (where application of site sampling is not appropriate).
- ISO 31000:2009 - Risk management -- Principles and guidelines

21.1.1 a) The rationale of a multi-site certification audit program is to reduce audit costs without notably increasing risk. A client organisation SHALL only be offered a multi-site certification if it is in full conformance with ALL the requirements of Section 21.2.

b) The decision to apply a multi-site certification process SHALL be instigated by the CB’s client by making a request to the CB in writing. Should the CB be satisfied that the requirements of Section 21.2 are met in full by their client, then a multi-site certification approach may be adopted and the client notified formally in writing.

21.1.2 The CB SHALL bear in mind that permitting a client to become certified using a multi-site approach should not be granted automatically and needs a documented justification.

21.1.3 Within the SA8000 system, the scope of multi-site SA8000 certification can be divided into two sector types. These being:
   I. Manufacturing (All sectors)
   II. Service Sector, Farms and Plantations.

21.1.4 To mitigate the risks mentioned in 21.1.1 above, a multi-site certification audit program SHALL ONLY be offered to organisations that can demonstrate that they subject each of their sites to an on-site internal audit at least on a biennial basis. Formal internal audit reports and findings raised SHALL be available at each CB audit of the client’s head office.

21.2 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.1.5)
21.2.1 A multi-site organisation SHALL be defined as per the definition in section 7 of this document. The organisation SHALL have a common management system which has established policies and procedures to manage all sites. The sites SHALL be subject to internal audits and monitoring by the Head Office. Multi-site SA8000 certificates SHALL be allowed except as defined in Section 10.1 Requirements.

21.2.2 a) The CB Client SHALL complete a Multi-site Questionnaire (provided by the CB) that includes a description of the primary and secondary processes as defined in IAF MD 19:2016.

b) SAAS will issue a SA8000 Certification Multi-site Questionnaire Template at www.saasaccreditation.org/accreditation-requirements as guidance for the CB. The CB’s own SA8000 Multi-site Questionnaire SHALL, at minimum contains all the fields in the SAAS Multi-site Questionnaire Template.
21.2.3 The IAF/ISO approach to multiple sites is useful and CBs SHALL review IAF MD 1:2007, IAF MD 5 and IAF MD 19 for guidance on sampling. However, the documents themselves cannot be fully adopted when certifying organisations to SA8000. In a social accountability context where every worker and every location is important, all workers SHALL be considered within the SA8000 certification process. The full-time equivalent concept is also not relevant to SA8000 certification when planning audit effort.

21.2.4 The CB SHALL have a documented procedure for determining whether a multi-site approach is possible for a client that identifies, as a minimum:
   a) Compliance with Procedure 200 Clause 21.2
   b) The Risk Assessment Process used by the CB to identify the risks of offering a multi-site approach to each particular client.
   c) Justification of the sampling used for Initial Certification, Recertification and Surveillance Audits.

21.2.5 A multi-site audit scheme can be applied in SA8000 where multiple sites are assessed together in order to provide a group or country certificate (see IAF MD 1:2007 for further definitions). The following requirements apply before a CB can issue a multi-site certificate and audit program to SA8000 for a client organisation:

   a) A multi-site organisation has a Head Office and 2 or more sites at which the same kinds of activities take place and where all sites operate under the same centrally managed system. If an organisation has 1 Head Office and 1 Site then this CANNOT be accepted as a multi-site certification. In this case these SHALL be considered as single site certifications.

   b) Certificates issued to Multi-site Clients SHALL NOT contain the names of Exclusive Suppliers, Non-Exclusive Suppliers or Subcontractors and can only refer to the branches of organisations that have a common ownership whose activities are completely within the Scope of the multi-site SA8000:2014 certification.

   c) The certification scope SHALL be similar for all sites. The scope of the certificate SHALL be transparent and clear for all stakeholders to understand exactly what is included in the certification. Multi-site certification SHALL NOT apply to organisations where the sites have fundamentally dissimilar or unrelated processes or activities, even though they may be under the same management system.

   d) The CB SHALL maintain a matrix listing all of the sites within the scope of the certificate, the locations, primary and secondary processes performed, the schedule of auditing those sites and the plan to audit the sites as well as a record of all the non-conformities raised at each site. Development of this matrix SHALL include a risk analysis for assigning sampling of locations and number of days.

   e) All sites that are to be included in the scope of a multi-site certificate SHALL be evaluated during the Stage 2 and Recertification audits (this may though be by means of reviewing the results of the client’s internal audit reports or remote audits) and subsequently audited at least once during the 3 year certification cycle.
f) All sites in a “multi-site” audit scheme SHALL be located within the same country and they SHALL be certified by the same accredited CB that has certified the organisation’s headquarters. If the CB utilizes subcontractors to deliver certification services for the client, the same subcontracted body SHALL audit the client’s entire system.

g) The client SHALL clearly understand (by means of wording in the CB’s contract for SA8000:2014 certification) that, in the case of multi-site certificates, if the certified organisation demonstrates a systemic failure in meeting SA8000:2014 requirements, then the CB SHALL review whether the certified organisation should have their multi-site certification cancelled. Records of such a review SHALL be maintained by the CB.

h) The client SHALL be aware it is not acceptable that, in order to overcome the issues raised by non-conformities identified by a CB with respect to a particular site, that the organisation seek to exclude this site from the scope of the multi-site certification process.

i) There SHALL be at least one of the CB Client’s Internal Auditor Team who SHALL have demonstrated social auditing competency and qualifications. There SHALL be no exceptions to these requirements.

21.3 Applicability of SA8000 Multiple-Site Certification

21.3.1 The organisation SHALL have one designated and formally nominated SA8000 management representative and deputy at the organisation headquarters for the whole group of sites, as well as local management representatives at the additional sites, and the following SA8000 requirements SHALL be MANAGED CENTRALLY at a designated organisation headquarters:
  a) Authorisation and Control of the SA8000 Management System Documentation;
  b) Evaluation and control of corrective actions, including root cause analysis, correction and preventive action;
  c) Centralised Management Review that addresses all sites;
  d) Centralised Hazard Identification and Risk Assessment activities and management of locally based Social Performance Teams;
  e) Centralised internal audit planning, delivery and evaluation of internal audit results. [Due to the reliance of the CB on the client’s own internal audit process to assess the sites within its own organisation].
  f) Control of suppliers;
  g) Centralised management systems addressing HR function;
  h) Identification and management of training needs.

21.3.2 The client organisation SHALL conduct internal audits of ALL sites at least:
  a) Prior to the Stage 2 and every Recertification Audit.
  b) Biennially during the 3 year certification cycle.
21.4 Manufacturing Multi-site Stage 1 and 2 Audit Effort – Head Office Audit

21.4.1 The organisation’s Head Office Stage 1 and 2 initial certification audits SHALL be performed as normal and fully in line with the requirements of Section 20.2 Single Site Initial Certification Audit Effort. Please see Procedure 200A for integration of Social Fingerprint into all stages of the multi-site certification process.

21.4.2 The audit effort calculation for the initial Stage 1 and 2 certification audits for a manufacturing company Head Office SHALL be based on that as described in Table 15. It is expected that as well as the Stage 1 Audit at Head Office that a typical site is also visited to confirm the primary and secondary processes performed at Sites as per 21.2.2.

21.4.3 The records reviewed at the initial Stage 2 certification audit for a manufacturing company Head Office SHALL be based on that as described in Section 15 – Table 6.

21.4.4 The worker interviews at the initial Stage 2 certification audit for a manufacturing company Head Office SHALL be based on that as described in Section 15 – Table 9.

21.5 Manufacturing Multi-site Stage 2 Audit Effort – Other Factories/Sites

21.5.1 A reduced audit effort for the other manufacturing sites within the same group may be applied as Section 21 - Table 17 below.

21.5.2 The records reviewed at the initial Stage 2 certification audit for other manufacturing sites within the same group SHALL be based upon the value of 50% of the number of employees as described in Section 15 – Table 6.

21.5.3 The worker interviews at the initial Stage 2 certification audit for other manufacturing sites within the same group SHALL be based upon the value of 50% of the number of employees as described in Section 15 – Table 9.

21.5.4 If the distance between two locations is less than 10km apart, the number of employees at both sites may be added together (clubbed) for audit effort planning purposes.
<table>
<thead>
<tr>
<th>Number Of Employees</th>
<th>Total Average Stage 2 Audit, Preparation &amp; Reporting - Days [Hours]</th>
<th>Minimum Stage 2 On Site Audit Effort Days [Hours]</th>
<th>*Average Stage 2 Reporting Days Days [Hours]</th>
</tr>
</thead>
<tbody>
<tr>
<td>1201-2000</td>
<td>5.5[44]</td>
<td>5[40]</td>
<td>0.5[4]</td>
</tr>
<tr>
<td>2001-3000</td>
<td>6[48]</td>
<td>5.5[44]</td>
<td>0.5[4]</td>
</tr>
<tr>
<td>3001-6000</td>
<td>6.5[52]</td>
<td>6[48]</td>
<td>0.5[4]</td>
</tr>
<tr>
<td>6001-10,000</td>
<td>7[56]</td>
<td>6.5[52]</td>
<td>0.5[4]</td>
</tr>
<tr>
<td>10,001-15,000</td>
<td>7.5[60]</td>
<td>7[56]</td>
<td>0.5[4]</td>
</tr>
<tr>
<td>15,001-20,000</td>
<td>8[64]</td>
<td>7.5[60]</td>
<td>0.5[4]</td>
</tr>
</tbody>
</table>

*Note: It maybe possible to combine the audit reporting of a Head Office and other sites into one report.

Table 17 - Multi-Site Other Factories/Sites Minimum On-Site Initial Audit Effort

21.6 Manufacturing Multi-site Surveillance Effort – Head Office

21.6.1 This SHALL be performed in line with Section 20 - Table 16.

21.6.2 The records reviewed at each surveillance audit for a manufacturing company Head Office SHALL be based on that as described in Section 16 – Table 13.

21.6.3 The worker interviews at each surveillance audit for a manufacturing company Head Office SHALL be based on that as described in Section 16 – Table 14.

21.7 Manufacturing Multi-site Surveillance Effort – Other Factories/Sites

21.7.1 This SHALL be performed in line with Section 21 - Table 18.

21.7.2 The records reviewed at the surveillance audit for the other manufacturing sites within the same group SHALL be based upon the value of 50% of the number of employees as described in Section 16 – Table 13.

21.7.3 The worker interviews at the surveillance audit for the other manufacturing sites within the same group SHALL be based upon the value of 50% of the number of employees as described in Section 15 – Table 14.
### Table 18 - Multi-Site Other Factories/Sites Minimum On-Site Surveillance Audit Effort

<table>
<thead>
<tr>
<th>Location</th>
<th>Employees</th>
<th>Initial Audit Effort</th>
<th>6 Monthly Surveillance</th>
<th>Initial Audit Effort</th>
<th>6 Monthly Surveillance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head Office</td>
<td>1000 Employees</td>
<td>11</td>
<td>2.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site 1</td>
<td>1000 Employees</td>
<td>4.5</td>
<td>1.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site 2</td>
<td>800 Employees</td>
<td>3.5</td>
<td>1.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site 3</td>
<td>250 Employees</td>
<td>2</td>
<td>1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* The above times are to be taken as minimum and may have to be increased for high risk, large, complex sites.

### Table 19-Manufacturing Group Audit Effort Example

<table>
<thead>
<tr>
<th>Location</th>
<th>Employees</th>
<th>Initial Audit Effort</th>
<th>6 Monthly Surveillance</th>
<th>Initial Audit Effort</th>
<th>6 Monthly Surveillance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head Office</td>
<td>1000 Employees</td>
<td>30</td>
<td>30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site 1</td>
<td>1000 Employees</td>
<td>15</td>
<td>15</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Site 2</td>
<td>800 Employees</td>
<td>14</td>
<td>13</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>Site 3</td>
<td>250 Employees</td>
<td>7</td>
<td>8</td>
<td>2</td>
<td>3</td>
</tr>
</tbody>
</table>

* The above are to be taken as minimum and may have to be increased for high risk, large, complex sites.

### Table 20-Manufacturing Group Records & Worker Interview Example
21.7.4 The above is meant to cope with the majority of multi-site certification scenarios. SAAS may be requested to consider variations to the above on an exceptional basis. Such variations will be considered in the context of a submission by the CB with an associated required document review by SAAS.

21.8 Service, Farms and Plantations Multi-Site Stage 2 Audit Effort – Head Office Audit

21.8.1 The organisation’s Head Office Stage 1 and 2 initial certification audits SHALL be performed as normal and fully in line with the requirements of Section 20.2 Single Site Initial Certification Audit Effort. Please see Procedure 200A:2015 (Audit Requirements for Accredited Certification Bodies For Social Fingerprint) into all stages of the multi-site certification process.

21.8.2 The audit effort calculation for the initial Stage 1 and 2 certification audits for a Service, Farms and Plantations company Head Office SHALL be based on that as described in Table 15. It is expected that as well as the Stage 1 Audit at Head Office that a typical site is also visited to confirm the primary and secondary processes performed at Sites as per 21.2.2.

21.8.3 The records reviewed at the initial Stage 2 certification audit for a Service, Farms and Plantations Head Office SHALL be based on that as described in Section 15 – Table 6.

21.8.4 The worker interviews at the initial Stage 2 certification audit for a Service, Farms and Plantations Head Office SHALL be based on that as described in Section 15 – Table 9.

21.8.5 Should the CB not be permitted access to any of these permanent sites at any time for whatever reason, a Critical Non-conformity SHALL be raised and the Client’s multi-site certification SHALL be cancelled and withdrawn.

21.9 Service, Farms and Plantations Multi-Site Stage 2 Audit Effort – Sites

21.9.1 Service, Farms and Plantations Sites Stage 2 Audit Effort SHALL be subject to full, limited and documentation review audits as per Table 21 below.

21.9.2 The records reviewed at the initial Stage 2 certification limited audit for a Service, Farms and Plantations Sites SHALL be at the discretion of the CB Lead Auditor ensuring that this does not adversely impact the credibility of the certification. The thoroughness of the documentation review depends on the robustness of the internal audits performed by the multi-site organisation and how much these can be relied on. It is expected that in their review of records, some records will be just “scanned” by the CB Auditor and others subject to a thorough review and triangulation. Records SHALL be made and maintained by the CB Auditor justifying the sampling protocol used.

21.9.3 The worker interviews at the initial Stage 2 certification audit for a Service, Farms and Plantations Sites SHALL be based at the discretion of the CB Lead Auditor ensuring that this does not adversely impact the credibility of the certification.

21.9.4 If the distance between two locations is less than 10km apart, the number of employees at both sites may be added together (clubbed) for audit effort planning purposes.
Table 21-Service, Farms and Plantations Multi-Site Stage 2 Audit Effort – Sites

<table>
<thead>
<tr>
<th>Number Of Sites</th>
<th>Total Sites To Be Audited</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-3</td>
<td>All</td>
<td>All</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>4-7</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>8-11</td>
<td>5</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>12-19</td>
<td>6</td>
<td>2</td>
<td>1</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>20-29</td>
<td>8</td>
<td>3</td>
<td>2</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>30-39</td>
<td>9</td>
<td>3</td>
<td>2</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>40-99</td>
<td>10</td>
<td>3</td>
<td>3</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>100-199</td>
<td>21</td>
<td>5</td>
<td>3</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td>200-399</td>
<td>31</td>
<td>6</td>
<td>4</td>
<td>21</td>
<td></td>
</tr>
<tr>
<td>400-699</td>
<td>40</td>
<td>6</td>
<td>4</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>700-999</td>
<td>50</td>
<td>7</td>
<td>5</td>
<td>38</td>
<td></td>
</tr>
<tr>
<td>1000-3000</td>
<td>60</td>
<td>8</td>
<td>5</td>
<td>47</td>
<td></td>
</tr>
</tbody>
</table>

*Location chosen at random and performed as an unannounced 0.5 day on-site audit focused on health and safety and worker interviews.

**Review of time and attendance, payroll, internal audit results and employee complaints performed by at Head Office on randomly selected sites.

Table 22-Example Of Service, Farms and Plantations Stage 2 Audit Effort

<table>
<thead>
<tr>
<th>Location</th>
<th>Employees</th>
<th>Table 15 - Days Initial Audit Effort Stage 1 &amp; Stage 2</th>
<th>Total # of Sites To Be Audited</th>
<th># of Sites For Full Audit</th>
<th># of Sites For Limited Audit</th>
<th># of Documentation Review Audits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head Office</td>
<td>60</td>
<td>N/A</td>
<td>5</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>66 Sites</td>
<td>N/A</td>
<td>10</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>4</td>
</tr>
</tbody>
</table>

The above times are to be taken as minimum and may have to be increased for high risk, large, complex sites.

21.9.4 The above is meant to cope with the majority of multi-site certification scenarios. SAAS may be requested to consider variations to the above on an exceptional basis. Such variations will be considered in the context of a submission by the CB with an associated required document review by SAAS.

21.10.1 Because of the sampling required, multi-site certifications in the service, farm and plantation sector can never be considered for annual surveillance audits. The CB SHALL produce a surveillance plan/matrix that covers their sampling of the whole network of Head Office and Sites for the complete 3-year certification cycle.

21.10.2 The Client’s Head Office SHALL be audited at least every six months by the CB. The audit effort day calculation for these audits SHALL be calculated as per Table 16.

21.10.3 In the service sector, where work is undertaken at sites not owned by the certified organisation, the CB SHALL perform a documented risk assessment to develop a surveillance strategy for those sites. The remoteness of location or expense of travel SHALL not have an effect as to whether a location should be visited or not. The output of the risk assessment SHALL result in identifying and adding the appropriate sites to be visited to the CB’s surveillance plan/matrix for the client’s 3-year certification cycle.

21.11 Multi-site Recertification Audits – All Sectors

21.11.1 Recertification Audits SHALL be performed in the manner as for Stage 2 initial certification audits with no reductions in audit effort.
Section 22

Non-Conformity Classification
22. Non-Conformity Classification

22.1 General - (ISO/IEC 17021-1:2015 Clauses 9.4.5; 9.4.9; 9.4.10

22.1.1 As per the SA8000 Standard, the client organisation SHALL comply with national and other applicable laws. When such applicable laws and the SA8000 Standard address the same issue, the provision which affords the highest level of protection to workers SHALL apply. Please reference the SA8000 Standard, Performance Indicator Annex, SA8000 Guidance and other related documents for guidance and interpretation.

22.1.1.1 Non-conformities raised by a CB with respect to violations to national and other applicable laws SHALL normally be raised as a Major N/C against the CB Clients “failure to commit to comply with the law”.

Flagrant, egregious or persistent violations of the law SHALL be raised as a Critical N/C against the CB Client’s “Management’s failure to demonstrate commitment to the law.”

22.1.2 The SA8000 Certification is management systems based and all findings with respect to individual matters (such as the height of a fire extinguisher) SHALL be raised as examples of a weakness in a particular management system element of the certified organisation. The NC (or Corrective Action Request – CAR) as written by the SA8000 auditor SHALL identify the non-conformance with that element of the management system (e.g., the health and safety risk assessment performed by the organisation was inadequate as it did not ensure that fire extinguishers were mounted at the correct height).

22.1.3 SAI has issued an SA8000 Performance Indicator Annex (PIA) to support implementation of the SA8000:2014 and assessment of compliance against the requirements found in the Standard. It is a list of compliance indicators expected to be met by every organisation complying with the SA8000 Standard. The requirements in the PIA may be fully or partially required by local or national law and SHALL be used as a guide in identifying potential client non-conformity throughout the SA8000 audit process, although evaluation of every indicator during every audit is not mandatory.

22.1.3.1 Each performance indicator in the PIA constitutes a secondary reference, providing a quantitative or qualitative measure of performance directly related to one or more of the requirements of the SA8000 Standard itself. The PIA is not a standalone or normative document; it requires simultaneous reference to the related requirement(s) of the SA8000 Standard.

22.1.3.2 CB auditors SHALL use these indicators to evaluate the extent to which an organisation’s activities/controls and social performance conform to each of the SA8000 Standard requirements. Therefore, the assessment planning and on-site audit shall include a process to review conformance with the indicators included in the PIA.

22.1.3.3 CB auditors shall use the information in the PIA to create and execute an audit plan in order to ensure that reviews of appropriate SA8000-related performance expectations are incorporated into the audit and determine conformance/non-conformance with respect to SA8000 requirements.
22.1.4 NCs SHALL be written as a management system NC against the appropriate element of the SA8000 Standard and/or the relevant section of the organisation’s management system procedures.

22.2 Non-Conformity Findings Classification

22.2.1 Types of Non-Conformity: There are four types of audit non-conformity findings that may be raised as the result of an SA8000 Stage 2, Surveillance, Transfer, Recertification or Special Audit. These are as follows:
   a) Critical Non-Conformity
   b) Major Non-Conformity
   c) Minor Non-Conformity
   d) Time-Bound Non-Conformity

22.2.2 Violations observed during an SA8000 audit that, in the opinion of the CB Audit Team, require immediate action by the CB client are known as critical issues, zero tolerances or immediately reportable issues and SHALL require the CB Auditor to raise a Critical Non-Conformity at the time of observing the violation. The CB auditor SHALL report the matter to the organisation immediately. In the case of such an issue, the CB Auditor SHALL immediately contact their CB to seek advice as to whether the audit should be aborted or continue. Lost revenue SHALL not be considered as to whether the audit should continue or not.

22.3 Non-conformity definitions

22.3.1 A CRITICAL non-conformity [CNC] SHALL be issued in the case of:
   a) A grievous breach of the SA8000 Standard that results in severe impact to individual rights, life, safety and/or SA8000, SAI or SAAS’ reputation. That includes:
      1. A breach of ethical standards;
      2. Immediate threats to workers lives; and/or
   b) See also the Definitions section of this document for further clarification.
   c) In the case of an SA8000 certified organisation: the raising of a CNC by a CB results in the immediate suspension of the organisation’s SA8000 Certificate. If the CNC was issued due to a breach of ethical standards, and leads to withdrawal of the SA8000 certificate, the organisation may re-apply for certification after a period of 12 months from the point at which the client has adequately demonstrated full and effective correction and corrective action that resolves ALL of the issues related to the CNC.

22.3.2 A MAJOR non-conformity is one or more of:
   a) The absence or total breakdown of a system to meet an SA8000 requirement. A number of minor non-conformities against one requirement can represent a total breakdown of the system and thus be considered a major non-conformity;
   b) A non-conformity that the judgment and experience of the SA8000 Lead Auditor indicates is likely either to:
1. result in the failure of the social management system in meeting its goals and expectations or
2. to materially reduce its ability to reliably assure control of its policies and directives in the workplace to protect its workers.

c) A MINOR non-conformity that has not been addressed, or for which no significant improvement has been made by the time of a follow-up audit, in spite the organisation’s commitment to resolve the issue.

d) A non-conformity that poses an imminent and immediate but not life-threatening threat to the health and safety of workers [in which case a Critical NC SHALL be raised].

e) A Major non-conformity may be raised after the audit ONLY in the case where an auditor is concerned for their personal safety and the possible consequences that might arise if they raised the Major NC at the time of the audit.

f) A MAJOR non-conformity that has not been addressed or for which no significant improvement has been made by the time of a follow up audit, in spite of the organisation’s commitment to resolve the issue, SHALL lead to the organisation being issued a warning and moved toward suspension.

22.3.3 A Minor non-conformity is one or more of:

a) A failure or oversight in some part of the organisation's social management system relative to SA8000 that is not systemic in nature;

b) A single observed lapse in following one item of an organisation's social management system.

22.3.4 A Time-Bound Non-Conformity [TB NC]:
Special non-conformities that can only be raised as a result of audit evidence and findings that show that the client organisation meets the local law BUT NOT the higher requirements of SA8000:2014 or vice versa. TB NCs CAN ONLY be raised for the findings as described in Table 23.

<table>
<thead>
<tr>
<th>SA8000 Element</th>
<th>Time-Bound Non-conformity</th>
<th>Nominal Corrective Action Timeline</th>
<th>Maximum Corrective Action Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Remuneration</td>
<td>The client organisation pays workers the legal minimum wage but not a living wage</td>
<td>18 Months</td>
<td>24 Months</td>
</tr>
</tbody>
</table>

Table 23 – Time-Bound Non-conformities

22.4 Non-conformity Format
22.4.1 Each audit non-conformity finding SHALL have four distinct parts:

a) The statement of non-conformity;

b) The grading of the non-conformity (critical, major, minor or time-bound);
c) Reference to the specific requirement in SA8000 audit criteria (including a summary of that requirement), AND additional reference to the applicable law, regulation, or other normative document, where appropriate;

d) The objective evidence observed that supports the statement of non-conformity.

22.4.2 The CB SHALL specify a time frame in which responses to critical, major, minor and time-bound NCs must be addressed as per Table 24. The time frame refers to the number of days from the last day of the on-site audit.

a) TB NCs SHALL be addressed as per the Table 23.

<table>
<thead>
<tr>
<th>Critical NC</th>
<th>Major NC</th>
<th>Minor NC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corrective Action Plan Sent To CB Within</td>
<td>Corrective Action Plan Sent To CB Within</td>
<td>Corrective Action Plan Sent To CB Within</td>
</tr>
<tr>
<td>Corrective Action Completed Within</td>
<td>Corrective Action Completed Within</td>
<td>Corrective Action Completed Within</td>
</tr>
<tr>
<td>1 Week</td>
<td>1 Month</td>
<td>1 Month</td>
</tr>
<tr>
<td>3 Months</td>
<td>2 Months</td>
<td>6 Months</td>
</tr>
</tbody>
</table>

Table 24 - NC Response & Close-Out Timescale

b) The CB and client organisation shall agree on the timing for the organisation's response for the NCs. In general, this will be as per Table 23.

c) Organisations shall not be issued an SA8000 certificate if there are any open CRITICAL or MAJOR NCs to SA8000.

d) Minor NCs may remain open for a specified period, not longer than 6 months, to allow sufficient time to close them effectively with on-site follow up at the next surveillance audit.

e) Corrective actions not completed within the allocated timing SHALL result in upgrading the NC and/or suspension or loss of the SA8000 certificate, depending on the nature of the lapse of the social accountability management system.

22.4.3 The CB is also encouraged to raise other categories of findings to provide added value to the organisation being audited. These categories of findings may include some combination of those listed below, with appropriate terminology and definition.

a) **Observation (Obs)** – this is where the CB can comment on best practice and ensure a value added component to each audit.

b) **Opportunity For Improvement (OFI)** – these are intended to indicate where practice is a little slack or inconsistent or systems may be improved. OFIs SHALL not be used where Minor NCs should have been raised and SHALL not constitute telling the client organisation what to do (i.e. consultancy).
c) **CB Eyes Only Comments** - Anecdotal, undocumented or unconfirmed statements or information that are relevant to the process SHALL be recorded by the CB but NOT included in the audit report to the CB’s client. These comments are then used to prepare the CB Audit Team for the next audit.

### 22.5 Closure of Non-Conformities during Audits

22.5.1 All non-conformities SHALL be recorded. Non-conformities SHALL NOT be closed by the CB during the audit in which they were issued. The CB SHALL require the organisation to submit root cause analysis (see ISO 17021-1:2015 Clause 9.4.9) and evidence of containment and systemic corrective action, along with evidence of effective implementation, for each non-conformity issued.

### 22.6 Closure of Non-Conformities

22.6.1 As per ISO 17021-1:2015 Clause 9.4.10 the CB SHALL verify the effectiveness of correction and corrective actions taken prior to closing an NC.

a) On-site verification of effectiveness SHALL be required for closure of all Critical and Major NCs. There may be very limited circumstances when a Critical or Major can be closed via documentation review. The CB SHALL maintain records detailing this deviation and under what circumstances it was allowed.

b) The special audit to confirm effectiveness of corrective actions addressing Critical NCs SHALL take place within 30 days of issuance of the Critical NC. The audit to confirm effectiveness of corrective actions addressing Major NCs SHALL take place within 90 days of issuance.

c) The CB SHALL have procedures to determine when an on-site visit is required to confirm effective closure of a Minor or Time-Bound NC.

d) Evidence of verification of effectiveness SHALL be documented and maintained in the client’s file.
Section 23

Audit Reporting
23. Audit Reporting

23.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.4.8)

23.1.1 The CB audit team SHALL provide a full report on the client’s audited activities and operations within 1 month after the last day of each Stage 1, Stage 2, Surveillance, Transfer, Unannounced, Special, and Recertification audit.

23.1.2 The audit report SHALL clearly show the parts of the system that were audited.

   a) The report SHALL include evidence of positive reporting showing conformance to the elements of the Standard. Positive reporting with supporting details provides value added information to the client and the CB technical reviewer and decision-makers.

   b) The context, findings and issues against each part of the audit SHALL be included and set out a description of the current situation, how specific requirements are managed, with supporting evidence and information to substantiate any findings.


23.1.3 As part of the SAAS accreditation audit, following a SAAS witness audit, the CB SHALL provide a copy of their audit report to SAAS [identical to that as provided to their client] within 10 working days after the last day of the on-site audit.

23.1.4 The SA8000 Lead Auditor SHALL be responsible for ensuring that comprehensive reporting notes and checklists are completed by all auditors and that these are kept as a record of the audit as hard or soft copies in the client file.

23.1.5 Unconfirmed statements or information reported by managers, workers, worker representatives or other stakeholders that are relevant to the process SHALL be recorded and kept as audit notes [maintaining confidentiality of sources] and not be included in the report.

23.1.6 The report SHALL NOT include reference to the root cause analysis, corrective and preventive action proposed by the client organisation as this is part of the audit follow-up activity.

23.1.7 At the end of each on-site audit, the CB auditor SHALL leave a copy of any NCs raised during the audit with the client so the client may begin the process of identifying containment actions, root cause and corrective actions.

23.1.8 SAAS will issue an SA8000 Certification Audit Report Template at www.saasaccreditation.org/accreditation-requirements as guidance for the CB. The CB’s SA8000 audit report SHALL, at minimum, contain all the fields in the Audit Report Template.

23.2 Audit Report Content

23.2.1 The CB’s SA8000 Audit Report SHALL ensure that positive reporting of each SA8000 element is addressed in the report as a macro-area of assessment, with more specific and descriptive notations consistently provided for those issues (single requirements) that are relevant to the specific organisation/area. Typically the report SHALL contain the items in Table 25.
**Note:** All management and worker interview records SHALL BE treated as confidential and NOT included in the report.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>A brief overall description of the organisation being evaluated with some information on the nature of the business, the size, number of employees, shift patterns and makeup of the organisation, and attach the CB’s regional background research materials.</td>
</tr>
<tr>
<td>b)</td>
<td>NCS are referenced to the appropriate clause and reflect the violation expressed from a management system perspective.</td>
</tr>
<tr>
<td>c)</td>
<td>Most importantly- describe where the team proposes accepting a deviation from the wages provision of the standard and raised TB Non-Conformities. This is intended to provide the CB’s Certification Decision Maker(s) with adequate information to decide on certification.</td>
</tr>
<tr>
<td>d)</td>
<td>Working hours- e.g. if there is no overtime problem, auditors SHALL report the evidence supporting compliance with the working hours criteria of SA8000, for example that the organisation has adequate equipment and staff to fill the orders it has accepted. The method that the organisation uses for time and attendance recording SHALL also be described e.g. biometric fingerprint.</td>
</tr>
<tr>
<td>e)</td>
<td>Status of control of suppliers- Include a brief summary on the status of “control of supplier” programs and risk mapping exercise e.g. a brief description of the plan and current results in terms of approved suppliers, demonstrated compliance or pending certifications.</td>
</tr>
<tr>
<td>f)</td>
<td>Wages- Provide basic wage information as an example of wages paid. This could be accomplished with a payroll sheet and a brief explanation of wage utilized.</td>
</tr>
<tr>
<td>g)</td>
<td>Home work- Include a brief description of home work if/when it is encountered, with an emphasis on the method of control and number of workers involved.</td>
</tr>
<tr>
<td>h)</td>
<td>Freedom of association- Provide a description of the presence of a trade union on site if there is one, or note what trade unions are prevalent or simply recognized in the sector and in the region, the common practice in the industry for representation, and how the employer demonstrates employees’ freedom to form a union of desired.</td>
</tr>
<tr>
<td>i)</td>
<td>Worker Representative – Provide a brief description of how any SA8000 worker representatives or committees were elected and when. Include any evidence of meetings, minutes, negotiations, and whether workers know their representative.</td>
</tr>
<tr>
<td>j)</td>
<td>Health and Safety- Confirm that conditions in the organisation are compliant with local laws and SA8000 minimum standards and SA8000 PIA and Guidance Documents.</td>
</tr>
<tr>
<td>k)</td>
<td>A description of any grievances or complaints received by the organisation since the last audit. The process as to how they were investigated and how the identification of the complainant was kept confidential. Include examples if there are many, and any that have remained unresolved for a long period of time.</td>
</tr>
<tr>
<td>l)</td>
<td>Description of how previous NCS and the organisation’s corrective action from previous NCS has been monitored and closed.</td>
</tr>
<tr>
<td>m)</td>
<td>Note ‘interview formats’ used- along with reports of information (i.e. number of interviewees per group, number of groups, on or off site).</td>
</tr>
<tr>
<td>n)</td>
<td>The SA8000 audit report SHALL NOT reference buyers or customers of the organisation.</td>
</tr>
<tr>
<td>o)</td>
<td>Photographs that are taken as evidence as part of the audit shall be included in the audit report.</td>
</tr>
<tr>
<td>p)</td>
<td>Social Fingerprint Self-Assessment and Independent Evaluation scores and correlation to NCS as appropriate.</td>
</tr>
</tbody>
</table>

Table 25 - Audit Report Content
Section 24

Audit Records
24. Audit Records
   24.1 General Requirements - (ISO/IEC 17021-1:2015 Clauses 9.9.2)

24.1.1 Each CB SHALL maintain, as a minimum, the records in Table 26 with respect to all on-site audits performed.

   a) These records may be kept as either hard or soft copies in the client file for the length of the certification cycle plus 3 years.

   b) Copies of all audit plans, audit reports, and non-conformities SHALL be available in soft copy at the CB’s Head Office (as defined in SAAS Procedure 201A).

<table>
<thead>
<tr>
<th>a)</th>
<th>b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copies of scheduled audits showing time and assigned auditors.</td>
<td>Calculation of audit effort.</td>
</tr>
<tr>
<td>c)</td>
<td>d)</td>
</tr>
<tr>
<td>Signed copies of Code of Ethics/ Anti-bribery Form.</td>
<td>Opening and Closing Meeting Attendee Lists.</td>
</tr>
<tr>
<td>e)</td>
<td>f)</td>
</tr>
<tr>
<td>Notes/minutes from stakeholder consultations and other pre-audit research.</td>
<td>Explanation of living wage calculation of both CB and client organisation.</td>
</tr>
<tr>
<td>g)</td>
<td>h)</td>
</tr>
<tr>
<td>Client’s completed application form.</td>
<td>Pre-assessment reports, if conducted.</td>
</tr>
<tr>
<td>i)</td>
<td>j)</td>
</tr>
<tr>
<td>Document reviews performed for initial and transfer audits.</td>
<td>Stage 1 readiness review report, including the evidence that all requirements of SA8000 are addressed by the certification applicant’s process.</td>
</tr>
<tr>
<td>k)</td>
<td>l)</td>
</tr>
<tr>
<td>The audit plan (agenda) for each audit demonstrating auditor itinerary details, time frames, subjects (processes) covered, and personnel involved.</td>
<td>The final audit report, including the opening and closing meeting attendance records, photographs, positive reporting notes and checklists completed by each auditor and the audit team, and their recommendation regarding granting or continuation of certification.</td>
</tr>
<tr>
<td>m)</td>
<td>n)</td>
</tr>
<tr>
<td>Copies of all non-conformities issued, audit reports, follow up reports, and other documentation leading to the verification of the effectiveness of the correction of the non-conformities.</td>
<td>Audit logs/notes as maintained by each audit team member.</td>
</tr>
<tr>
<td>o)</td>
<td>p)</td>
</tr>
<tr>
<td>The audit team members’ initial assignment approval by the CB and acceptance of each team member by the client organisation.</td>
<td>Social Fingerprint Self-Assessment and Independent Evaluation scores.</td>
</tr>
<tr>
<td>q)</td>
<td></td>
</tr>
<tr>
<td>Brief overview of the client’s compliance with the requirements of the SAAS Performance Indicator Annex.</td>
<td></td>
</tr>
</tbody>
</table>

Table 26 - Audit Records

24.1.2 Records SHALL be maintained in a language common to the local offices and auditors and the SA8000 head office for the CB. ALL certification records SHALL be made available, via translation if necessary, for review by the SAAS accreditation auditor upon request.
Annex A

Change History Log
SAAS Procedure 200 is subject to an Annual Review. The first annual review was performed in December 2016. The changes are designated in the following table prefixed by the number 3.

The changes from the previous version (Issue 2) are shown as follows and are highlighted in yellow.

<table>
<thead>
<tr>
<th>Change #</th>
<th>Description</th>
<th>Text Changed/Added/Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1</td>
<td>Method of highlighting changes</td>
<td>Added as Yellow highlighting</td>
</tr>
<tr>
<td>3.2</td>
<td>Procedure 200 Up-issued</td>
<td>Issue 2, Approval Name and October 2015 changed to Issue 3, John Brookes and February 17, 2017</td>
</tr>
<tr>
<td>3.3</td>
<td>Line numbering removed</td>
<td>Across complete document</td>
</tr>
<tr>
<td>3.5</td>
<td>Added Change History Log as new Annex A</td>
<td>Annex A - Change History Log</td>
</tr>
<tr>
<td>3.6</td>
<td>Section 7</td>
<td>Renumbered to adjust for new definitions</td>
</tr>
<tr>
<td>3.7</td>
<td>7.2.5</td>
<td>7.2.5 Consortium = An association of two or more companies with the objective of participating in a common activity.</td>
</tr>
<tr>
<td>3.8</td>
<td>7.2.9</td>
<td>Clause reworded as follow: Exclusive supplier = A supplier that produces product(s) or supplies a process(es) exclusively for a single customer. In the context of this document, exclusive supplier refers to a supplier that supplies only to one customer and whose work force is to be considered a part of the organisation that is being certified. Such a supplier may be on-site or off-site and SHALL be included as part of the scope of the certification audit (and hence audit day calculations) rather than the control of suppliers clause of SA8000. Exclusive suppliers SHALL NOT be included on their customers SA8000 Certification Certificate. For audit effort calculations, the employees of the exclusive supplier are added to those of their customer.</td>
</tr>
<tr>
<td>3.9</td>
<td>7.2.17</td>
<td>New definition added as follow: Multi-Site documentation review audit = A review of randomly chosen time and attendance, payroll, internal audit results and employee complaints records at a Multi-Site Head Office Audit.</td>
</tr>
<tr>
<td>3.10</td>
<td>7.2.18</td>
<td>New definition added as follow: Multi-Site Limited Audit = A reduced audit effort audit at a location(s) chosen at random and performed unannounced on-site. See multi-site audits, Section 21, for additional details.</td>
</tr>
<tr>
<td>3.11</td>
<td>7.2.24</td>
<td>Clause reworded as follow: Root Cause Analysis = Application of a problem solving methodology such as “5 Whys” or “Pareto Analysis” which is used</td>
</tr>
</tbody>
</table>
### 3.12 7.2.28
Clause reworded as follow:

<table>
<thead>
<tr>
<th><strong>Site</strong> = Location where an organisation carries out work or a service. Sites are defined as either <strong>temporary</strong> or <strong>permanent</strong> as described below: These definitions are not relevant to contract length. See also Multi-Site organisation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) A <strong>temporary site</strong> is one set up in order to perform specific work or service for a finite and limited period of time for example: Construction Sites, Temporary Exhibitions, Outdoor events and concerts, Event caterers, One off customer call-out to repair items - e.g. photocopier repair or fire/security alarm installations.</td>
</tr>
<tr>
<td>b) A <strong>permanent site</strong> is one where a CB’s client performs work or provides workers to perform a service on a continuing basis. These are usually an operating Unit owned or leased by the parent organisation to carry out mostly similar kind of activities. The location is permanent and is usually a building or piece of land/garden where the SA8000 certified organisation permanently places their workforce to perform tasks on a full time or part time basis every working day.</td>
</tr>
<tr>
<td>c) <strong>Additional sites</strong> include a new site or group of sites that are to be added to an existing multi-site organisation.</td>
</tr>
</tbody>
</table>

### 3.13 7.2.34
Added in the word “which” and removed the words “or Major” from definition.

### 3.14 8.0
Revised Content Completely but with the wording of the first Clause reworded as follows:

In all cases, the current edition of a certification standard, normative document or guidance SHALL be the reference document in this procedure, per the standard’s published rollout schedule. The latest and up to date versions of SAI’s documents can be found on their website at: [www.sa-intl.org](http://www.sa-intl.org). The latest and up to date versions of SAAS documents can be found at: [www.saasaccreditation.org/document-library](http://www.saasaccreditation.org/document-library).

### 3.15 10.1.7 b)
Clause reworded as follows:

b) The scope of a single SA8000 certificate SHALL cover all processes, properties and operations of a continuous process or premises. It SHALL be assured that all legal entities that are involved in the continuous processes (as described on the SA8000 Certification Certificate) are to be considered within the planning throughout the entirety of the SA8000 certification cycle.

### 3.16 11.1.10
Added new clarification:

Social Fingerprint SHALL be fully integrated into the SA8000 audit process as described in the Procedure 200A (Audit Requirements for Accredited Certification Bodies For Social Fingerprint).

### 3.17 12.1 a)
Changed time frame:

a) For announced audits, the audit plan SHALL be sent to the client at least **2 weeks** prior to the audit and SHALL include the name of and summary of background information on each member of the audit team.
| 3.18 | 12.1.1 d) | Add new clause d)  
|      |          | d) The audit plan SHALL ensure for all audits, that the composition of the audit team reflects the gender balance of the employees and industry sector of the client unless justified and authorized by CB management. |
| 3.19 | 12.1.1 e) | Add new clause e)  
|      |          | e) The audit plan SHALL indicate who on the audit team possesses the appropriate industry sector experience. |
| 3.20 | 12.1.4   | Clause reworded as follows:  
|      |          | The audit plan SHALL indicate the need for the certified organisation to provide their calculations of living wage and the lowest wage paid to any employee in the organisation, adjusted to gross or net. The certified organisation shall also supply evidence of the legally required minimum wage (that is the lowest wage permitted by law or by a special agreement such as one with a labor union). |
| 3.21 | 12.1.7   | This is now 12.1.8. |
| 3.22 | New 12.1.7 | Added new clarification:  
|      |          | The CB SHALL ensure that the client is informed (for every type of audit except those unannounced) of their right to object to any member of the audit team as required by ISO 17021-1:2015, 9.2.3.5. Records of this communication SHALL be maintained by the CB. |
| 3.23 | 12.1.8 Table 2 f) | Clause reworded as follows:  
|      |          | f) SA8000 management representative; SA8000 workers representative; Trade Union representative; Social Performance Team Member(s). |
| 3.24 | 12.1.8 Table 2 j) | Clause reworded as follows:  
|      |          | j) Approximate time of each audit activity and date. This SHALL also include the time allocated to perform the SF IE. |
| 3.25 | 12.1.8 Table 2 q) | Clause reworded as follows:  
|      |          | q) Statement on the need for senior management, workers representatives, SPT Team to be present at the opening and closing meetings. |
| 3.26 | 14.1.1 Table 3 l) | Clause reworded as follows:  
|      |          | l) Evaluate if internal audits and management review are being planned and performed and to ascertain the organisation’s general conformity with the SA8000 Standard and Performance Indicator Annex. |
| 3.27 | 14.1.1 Table 3 n) | Added new clarification:  
|      |          | n) To confirm the date when the client declares that their SA8000 management system was fully operational. This date SHALL be recorded in the Stage 1 Audit Report. |
| 3.28 | 14.2.2   | Added new wording  
|      |          | 14.2.2 For all Stage 1 audits, an audit plan SHALL be developed and sent to the client at least 2 weeks prior to the audit. The client’s Social Fingerprint Self-Assessment Score SHALL be factored into the Stage 1 audit planning process. |
| 3.29 | 14.3.5 | Added new clarification: 14.3.5 The Stage 1 Social Fingerprint IE score SHALL be factored into the Stage 2 audit planning process by the Stage 2 nominated Lead Auditor. |
| 3.30 | 15.3.7 | Clause reworded as follows: 15.3.7 The client SHALL be reminded of the need of the CB Auditors to take photographs and copies of documents for evidence of conformance but that the company can view all such photographs that the auditor may take at the end of the audit. The auditor SHALL also mention that photographs will not be taken of proprietary processes. |
| 3.31 | 15.4.5 | Clause deleted. |
| 3.32 | 15.6.4 | Added new clarification: 15.6.4 The CB’s SA8000 audit team SHALL review records for at least the last twelve months prior to the audit date but, for initial certification, records completed by the company before the declared initial start date of the CB Client Company’s SA8000 Management System implementation date SHALL not be cited as evidence of a Non-conformity. |
| 3.33 | 15.8.2 b) | Added new clarification: b) Interviews with the members of the SPT shall focus on implementation of the SPT’s responsibilities, risk assessment, ongoing monitoring, internal audits, communication, complaint management and resolution, and commitment by Senior Management to the SA8000 Standard. |
| 3.34 | 15.8.3 c) made 15.8.3 d) | A new section 15.8.3 c) added 15.8.3 c) The worker representative(s) SHALL be asked to describe the election process followed when electing such representative(s). |
| 3.35 | 15.8.4 d) | Wording added at the end of 15.8.4 d) Auditors shall ensure that CB contact information is available and listed in a prominent place such as the time and attendance recording location, dormitory or canteen at the certified organisation. Contact information SHALL also be given out by CB Auditors to workers chosen at random during the factory tour. |
| 3.36 | 15.8.4 h) | Clause reworded as follows: h) Off-site interviews SHALL be undertaken, at minimum, for clients based in highest risk countries. In this case, at least a minimum of 2 workers to a maximum of 10 workers SHALL be interviewed off-site. Off-site interviews should be at a location where workers feel comfortable to share their opinions about work conditions. Dormitories without security guards present, apartments shared by workers, and entertainment facilities can be good places to conduct interviews. Auditors can consult with local organisations trusted by workers for good locations. |
| 3.37 | 15.9.1 made 15.9.2. A new 15.9.1 added to address pre-closing meetings | Added new clarification: 15.9.1 Pre-Closing Meeting a) The CB Lead Auditor may decide, at their discretion, to hold a pre-closing meeting with the client organisation’s SA8000 Management Representative and Social Performance Team so as to ensure the client has a clear understanding of the outcome of the
<table>
<thead>
<tr>
<th>Page</th>
<th>Clause</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.38</td>
<td>15.9.2 b)</td>
<td>Clause reworded as follows: &lt;br&gt;b) Workers Representatives and <strong>Representatives of the Social Performance Team</strong> SHALL be requested to attend the Closing Meeting. If the Workers Representative is not in attendance, this SHALL be noted in the audit report.</td>
</tr>
<tr>
<td>3.39</td>
<td>15.9.2 f)</td>
<td>Added new clarification: &lt;br&gt;f) The client shall be informed if an additional full audit or limited audit (on-site) or documented evidence (to be confirmed during future audits) will be needed to verify effective correction and corrective actions of any Critical or Major Non-Conformity raised</td>
</tr>
<tr>
<td>3.40</td>
<td>16.1.1 Figure 2</td>
<td>Figure 2 replaced to match the figure found in P. 200A:2015</td>
</tr>
<tr>
<td>3.41</td>
<td>16.1.2</td>
<td>Clause reworded as follows: &lt;br&gt;Unless otherwise described in this document, surveillance audits of SA8000 certified organisations SHALL be planned as described in Figure 2 (with variance, as noted in clause 16.2 for unannounced audits). The Social Fingerprint Independent Evaluation SHALL be implemented at different points within the certification cycle, as per Procedure 200A:2015 (Audit Requirements for Accredited Certification Bodies For Social Fingerprint).</td>
</tr>
<tr>
<td>3.42</td>
<td>16.1.6 c)</td>
<td>Clause reworded as follows: &lt;br&gt;c) Delays in surveillance audit scheduling: Any delay due to a client request SHALL be documented and authorized only in unusual circumstances. Such circumstances include civil unrest, flooding etc. If the request from the client is deemed to be reasonable, and the delay is between 3 and 6 months (but no more than 6 months), then the client’s certificate SHALL be suspended until such a time that the required surveillance can take place.</td>
</tr>
<tr>
<td>3.43</td>
<td>16.1.6 d)</td>
<td>Added new clarification: &lt;br&gt;d) The CB SHALL only restore a suspended certificate if the issue(s) that resulted in the suspension has been resolved. Failure to resolve the issues that resulted in the suspension in line with Paragraph 16.1.6 c) SHALL result in withdrawal of SA8000 certification.</td>
</tr>
<tr>
<td>3.44</td>
<td>16.1.6 e)</td>
<td>Added new clarification: &lt;br&gt;e) If the delay due to a client request is greater than 6 months, then the client’s certificate SHALL be cancelled. Records of a suspension or cancellation SHALL be documented and maintained by the CB.</td>
</tr>
</tbody>
</table>
### 3.45 16.1.6 f) Added new clarification:

f) Under no circumstance SHALL two surveillance audits be combined as one.

### 3.46 Addition under main Section 18.0.

This Section 18 specifically relates to Transfer Audits. If a CB receives a request for certification from any previously SA8000 certified client, even if they are not treating this request as a transfer audit, then that CB SHALL formally confer with SAAS to ensure that the client has a clean certification history.

### 3.47 18.1.5 b) Added new clarification:

b) The existing client certificate SHALL be valid, with no open critical or major non-conformities. Organisations whose SA8000 Certificate has expired ARE NOT eligible for this Transfer process and shall be treated as new clients.

### 3.48 18.1.5 c) Combined previous clause b) and c) and reworded:

c) If open critical or major NCs exist, no transfer audit may be undertaken. If the client is currently suspended with its existing CB, a transfer may not take place. Any open minor non-conformities SHALL be addressed by a corrective action plan.

### 3.49 19.1.3 e) New clarification added:

e) To verify on-site, the effectiveness of a CAP produced by the CB Client Organisation as response to the raising of a Critical or Major nonconformity.

### 3.50 20.1.3 Deleted wording “Performance Indicator Annex”:

20.1.3 Particular attention SHALL be paid when calculating the auditor days for the on-site audit as the on-site audits are the most critical phases in the entire certification process and allows the auditor to assess full compliance to the SA8000 Standard Elements.

### 3.51 20.1.5 c) New clarification added:

c) Calculation of personnel SHALL include on-site and exclusive suppliers, including those personnel supplied by a private employment agency. Personnel provided by such suppliers SHALL be included as part of the scope of the SA8000 audit (and hence audit day calculations) rather than the control of suppliers clause of SA8000.

### 3.52 20.2.2 Clarified Table 15 Audit Effort.

### 3.53 20.2.3 New clarification added:

20.2.3 No reductions in audit days are permissible for any reason except for organisations that have progressed from the BSCI Code of Conduct Program to SA8000 certification, as described in Clause 20.3.1 below. This exception is applicable due to the oversight activities performed by of the BSCI system.

### 3.54 20.3 Simplified this Section:

Removed Table 16.

### 3.55 20.3.1 New clarification added:

20.3.1 A MAXIMUM of 20% overall reduction in audit effort as described in Section 20 Table 15 MAY be used if an organisation has been subject to a BSCI Code of Code Audit in the 6 months preceding the initial Stage 2 SA8000 certification audit and has achieved an overall “A” [Outstanding] or “B” [Good] rating for all
| 3.56  | 20.3.2 | Reworked this paragraph: 
In order to apply this reduction, the CB SHALL have access to and SHALL review previous BSCI audit reports. |
<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>3.57</td>
<td>20.5.4</td>
<td>Revised previous Table 17 that is now Table 16</td>
</tr>
<tr>
<td>3.58</td>
<td>Section 21 - Multiple Sites</td>
<td>Complete re-write of this section.</td>
</tr>
</tbody>
</table>
| 3.59  | 22.1.1.1 | New clarification added: 
Non-conformities raised by a CB with respect to violations to national and other applicable laws SHALL normally be raised as a Major N/C against the CB Clients “failure to commit to comply with the law”.
Flagrant, egregious or persistent violations of the law SHALL be raised as a Critical N/C against the CB Client’s “Management’s failure to demonstrate commitment to the law.” |
| 3.60  | 22.3.1 c) | New clarification added: 
c) In the case of an SA8000 certified organisation: the raising of a CNC by a CB results in the immediate suspension of the organisation’s SA8000 Certificate. If the CNC was issued due to a breach of ethical standards, and leads to withdrawal of the SA8000 certificate, the organisation may re-apply for certification after a period of 12 months from the point at which the client has adequately demonstrated full and effective correction and corrective action that resolves ALL of the issues related to the CNC. |
| 3.61  | 24.1.1 - Table 26 | New clarification added: 
q) Brief overview of the clients compliance with the requirements of the SAAS Performance Indicator Annex. |

------------End of SAAS Procedure 200 Issue 3.1----------