

Data Protection and Ethical Audits Statement

In order to carry out an ethical audit, one or more auditors from Verner Wheelock will require access to personnel files and records at your site. Employees will be provided with information prior to the audit and only data relating to those who give their consent, through signing a data protection waiver, will be viewed. Below we have outlined how we will process personal data during an audit.

The type of personal data we will view

In personnel records our auditor will review ID and Right to Work documentation, NI numbers, contracts, training records, disciplinary records. The auditor will also review payroll and payslips, working hours records, and copies of policies and procedures relating to employment of permanent and agency workers.

Why we will view this data

We need to review documents from employees' personnel files to ensure that your site is complying with employment law and the ETI Base Code. This will include making sure that all employees are eligible to work in this country, to check that employees are being paid at least minimum wage with no unauthorised deductions, that laws on health and safety and working hours are being adhered to and that employees are free to leave employment. The audit will be carried out in line with SMETA Best Practice Guidance.

What we do with this data

The information will be reviewed on site by the auditor in strictest confidence. Worker interviews form part of the audit process and the information collated from the document review will be used in conjunction with the interview findings to complete a report. The information is input into templates to produce a SMETA Ethical Audit Report and Corrective Action Plan Report (CAPR). No documents will be copied or removed from files, and no names or other data which enables individuals to be identified will be recorded.

Who will see the Audit Report

Before they are uploaded to Sedex, only employees and auditors at Verner Wheelock have access to the Audit Report and CAPR. Once the site has approved them we will upload to the Sedex online system. Once the reports are on Sedex, you control who has access to the data. We do not share this information with any other third parties.

Data Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard the data we hold. Our internal systems and the Sedex system are password protected and stored on a secure server. We will keep the reports for 6 years and they will be available on Sedex indefinitely.

Shadow Audits and Observed Audits

From time to time the auditor may be accompanied by another person who is shadowing or observing them on an audit. These people will include representatives from Verner Wheelock who are monitoring the auditor, or from Sedex, and occasionally from your retail customers. These individuals will only attend the audit with permission from the site and will be asked to sign a confidentiality agreement.

Our Privacy Policy is available on our website www.vwa.co.uk.