

VWA Sensitive Issues Policy (Workers Interviewed)

The following is a policy statement for interviewed workers of our role in the implementation of Sensitive Issues within our organisation and its place in SMETA audits and management.

How sensitive issues are reported raises questions of confidentiality and potential victimisation, but also possible false accusations, which may be e.g. isolated grudges. In addition there is a potential lack of transparency where the ultimate customer (brand/retailer) may be notified of an auditor's suspicions without the site being aware of these, resulting for example in the site having no right of reply.

This policy and procedure look at the procedure available for auditors making a reporting and the internal process for VWA to overcome bias and address the issues as noted above.

In addition, the VWA is supplemented by the SMETA Best Practice Guidance which the auditor should read and be familiar.

The following topics may sometimes be considered sensitive:

- Sexual behaviours or practices at the site.
- Harsh Treatment, Harassment or Threat of Abuse
- Illegal activities or ethically questionable behaviours.
- Racism, ageism, classism, discrimination, and sexism.
- Exploitation
- Modern slavery
- Extreme political views
- The experience of being part of any of the potentially vulnerable populations.
- Bullying and harassment
- Attitude of Employer Towards Trade Unions
- Access for Representatives to Carry Out their Functions
- Discipline Procedures
- Grievance Procedures
- Bonded Labour
- Freedom of Movement

The current SMETA Best Practice Guidance (BPG) gives some information on dealing with sensitive issues, (see 7.3.9. Alert Notification and Supplementary Information).

SMETA Best Practice Guidance also gives specific information on handling of worker interviews in section 7.3.2. 'Worker Interviews'.

It also gives details of the need for an auditor to give workers a confidential contact in the event that the worker wishes to add information outside the interview or while not at work. The importance of protecting the confidentiality of workers is also stated under BPG section 7.3.9 'Alert Notification and Supplementary Information'.

Auditors should be familiar with these SMETA Best Practice Guidance sections as part of their competency requirements.

It is important to note Non-conformances/non compliances cannot be raised based solely on worker allegations alone.

Raising concerns (by the auditor on behalf of the worker(s))

SMETA Best Practice Guidance recognises that there is a dilemma. Throughout the BPG the anonymity and confidentiality of the worker interview process is emphasised and the guidance requires that an Alert or Supplementary information is sent confidentially to the audit requestor.

The current approach contained in the SMETA Best Practice Guidance Document and adopted by VWA is consistent with the GSCP methodology on this topic.

Under certain circumstances where a sensitive issue has been raised by one or more employees during the interview process, auditors may feel the need to produce a separate, supplementary audit report or alert notification for the audit requestor. The following 2 types of report can be used in these circumstances. These reports contain the following information.

1. Supplementary Report

- Information too sensitive for the audit report.
- Concerns which cannot be substantiated through documentary evidence.
- Attitude of management towards the noncompliance's or the audit process as a whole.

Supplementary reports may be appropriate:

- If workers appear to be under undue pressure from management on the day of audit.
- If workers appear to have been coached.
- If management was obstructive or reluctant to accept findings and the need for remediation.
- Where the auditor has concerns about the possibility of double books or falsified records.
- Where sensitive issues could not be discussed during the closing meeting because of a potential risk to workers' wellbeing.

2. Alert Notifications

- Urgent information which the auditor feels must be rapidly conveyed to the audit requestor.

Procedure for raising the Sensitive issue supplementary report or alert notification.

1. The auditor will use established methodology of randomly selected interviews and assures employees of confidentiality.
2. The auditor will raise a supplementary or Alert, after first informing VWA of the issue, to the client and does not report the concern on SMETA Report or CAP.
3. Auditors will give extra information to employees e.g. Whistle blower lines, grievance procedures, external sources of advice and support via NGO's, web sites, phone lines etc.

VWA Internal Next steps.

The Company Director will be responsible for ensuring that a full investigation takes place with the objective of establishing whether sensitive issue has occurred. In relevant circumstances, the Company Director may delegate tasks and responsibilities to specific independent Company managers and/or the Human Resources team to assist in conducting the investigation.

As part of the investigatory process, it may be necessary for the Company Director (or those individuals nominated by the Company Director to assist in the conduct of the investigation) to make further enquires on how the audit was conducted and who was interviewed. The purpose of any such enquiry will be to obtain further details of the concern and gain a better understanding of the relevant background facts supporting sensitive issue and take appropriate action to address concerns with the issue in combination with the commissioning client.