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Auditing to Social Standards – Interviews with Workers

Applicability: GOTS, TE-GRS

References:

GOTS Approval Procedure and Requirements for CBs (May 2017) section 5.2.2.3.g & GOTS v5 Implementation Manual (March 2017)

TE Accreditation and Certification Procedures (Feb 2013) & ISO/IEC 17065 (2012) section 7.4.4, regarding assessment of requirements of GRSv4 section B2, GRSv4.1 Implementation Manual.

Applicable immediately.

This Official notice has been written to clarify the requirement on auditing compliance with social requirements as part of GOTS and TE-GRS certification, specifically regarding interviews with workers – numbers, types, measures for confidentiality.

Norm references:

GOTS v5 IM section 4.1:

“The on-site inspection protocol with regard to minimum social criteria shall at the very minimum undertake the following, as applicable to the inspected facility: ...

b) Interview with management and confidential interviews with workers and worker's representatives” ...

In specific the Sedex Members Ethical Trade Audit (SMETA) Best Practice Guidance, Appendix 5, should be used as a framework to establish audit length and number of individual interviews performed for inspections in developing countries...”

Note: IOAS received confirmation from Global Standard gGmbH that interviews with workers and worker representatives must always be carried out as part of auditing social criteria - even in developed countries, however there may be less time allocated to this activity according to risk assessment results.

Textile Exchange GRS Implementation Manual v4.1 Guidance to Section B:



“In particular, the audit shall include: ...

Interview with management and confidential interviews with workers and workers’ representatives”

Note: IOAS received clarification from TE that it is appropriate to expect that number of interviews to reflect operation size, complexity and risk of NCs against social standards.

IOAS formal interpretations:

1. In all cases, CBs must have policies / procedures / instructions for GOTS audits to include confidential interviews with workers and worker representatives to verify compliance with GOTS Social Criteria. These procedures must either refer directly to full implementation of SMETA guidance (with regard to worker interviews), or they must ensure that numbers and types of interviews are representative of each operators’ profile (size, complexity etc.) and risk of being out of compliance with GOTS Social Criteria.

2. In all cases, CBs must have policies / procedures / instructions for GRS audits to include confidential interviews with workers and worker representatives to verify compliance with GRS Section B2. These procedures must ensure that numbers and types of interviews are representative of each operators’ profile (size, complexity etc.) and risk of being out of compliance with GRS Section B2. Although direct implementation of guidance documents such as SMETA is not required by TE, such literature will be part of background references considered by IOAS to assess a CB’s social audit policy/procedure and decide whether approach and risk factors covered are appropriate.

3. In all cases, CBs must have measures in place to ensure that interviews with workers and worker representatives performed by CBs as part of GOTS or GRS audits are **confidential** - as a minimum, IOAS expects to verify that:
 - operators, their management and supervisors, as well as interviewed workers and worker representatives are clearly informed that interviews with workers and worker representatives are always confidential between the CB and the interviewees;
 - selection of workers for interviews is done by the auditor/s only (i.e. operator has no influence in determining the interviewees).



- interviews with workers and worker representatives are held without the presence of the operation's managers or supervisors; accordingly, management or their representatives must not act as translators during such interviews;
 - worker interviews are conducted in a place where they can feel at ease to talk and in such a way as to not inhibit the interviewee
 - workers' identities (names, ID numbers etc.) should not be written in the audit report shared with the operator.
4. In all cases, and without prejudice to the above requirement for confidentiality, there must be **evidence** demonstrating that interviews with workers and worker representatives performed by CBs as part of GOTS or GRS audits have been conducted and have followed the CB's procedure.

If you have any questions related to this official notice, please contact your Client Manager.

End