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SAAS Procedure 201A

Accreditation Requirements

**For Use By Certification Bodies Performing
SAAS Accredited SA8000:2014 Certification Audits**

October 2015

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0. Introduction

The SAAS accreditation requirements for the accreditation programs that SAAS operates are described in the “201” procedure series. These procedures are detailed in Figure 1 below.

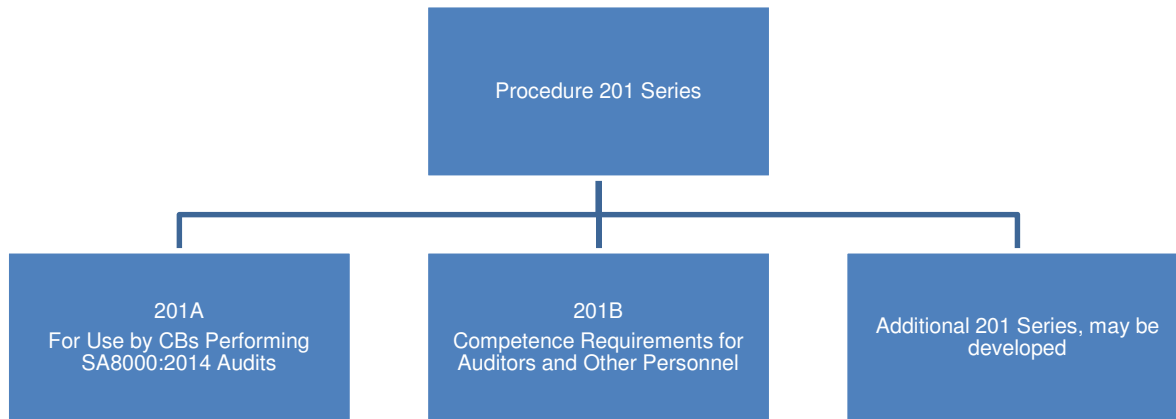


Figure 1 - The SAAS Procedure 201 Series

This document is SAAS Procedure 201A, which describes the process for granting, maintaining, extending, reducing, suspending and withdrawing SAAS accreditation for Certification Bodies (CBs) that deliver SA8000 certification. This procedure is supported by other procedures as outlined in ANNEX B - SAAS Documents.

SAAS Procedure 201A is based upon the requirements of the following:

1. For the general administration and delivery of accreditation for SA8000 certification: *ISO/IEC 17011:2004 "General requirements for accreditation bodies accrediting conformity assessment bodies"*
2. For the general administration and delivery of SA8000 certification services: *ISO/IEC 17021-1:2015 "Conformity assessment –Requirements for bodies providing audit and certification of management systems - Part 1: Requirements"*

This document supersedes all previous versions of Procedure 201 and related Advisories. Procedure 201A is intended for use by SAAS and for use by applicant and accredited CBs for their informational purposes. It defines the rights and responsibilities of SAAS and accredited CBs, as well as the SAAS activities required for assessing and accrediting CBs. It provides transparency that is required of an international accreditation body and has been established to assure consistent and reliable assessments throughout the accreditation process. This document is supported by a set of internal SAAS work instructions and other documents defining the conduct of accreditation audits.

SAAS has updated Procedure 200 and Procedure 201 in conjunction with the revision of SA8000:2014. In order to retain clarity, Procedure 201 has now been split into two separate documents 201A and 201B (see above).

The accreditation requirements detailed in this document are designed to supplement or amend the requirements of ISO17021-1:2015 as needed. Thus, the requirements of ISO17021-1:2015 **SHALL** apply as written. This procedure SHALL specify additional or amended requirements as needed. See Annex A - ISO17021-1:2015 - SAAS ACCREDITATION ADDITIONAL REQUIREMENTS in this document for additional requirements for applicant and accredited CBs supplemental to those found in ISO 17021-1:2015.

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0.1. DEFINITIONS

- 0.1.1 **Accreditation Review Panel (ARP)** - SAAS convenes an Accreditation Review Panel (ARP), a committee of SAAS whose members review applications for initial accreditation and reaccreditation from auditing firms seeking to become Certification Bodies (CBs) accredited by SAAS. The ARP is given the authority by the SAAS Board of Directors to make accreditation recommendations to the SAAS Executive Director who shall be responsible for the final accreditation decision.
- 0.1.2 **Accreditation Requirements** – Includes SAAS Procedure 201A and Procedure 201B, ISO/IEC 17021-1:2015, and any supplemental SAAS Accreditation Rules that may be issued periodically in the form of Notifications, Advisories or other documents.
- 0.1.3 **Accreditation Rules** – Positions taken or policies established for operational issues related to SAAS accreditation of SA8000 certification programs (may also be known as Advisories). By reference, Accreditation Rules SHALL be seen as requirements and incorporated in SAAS documents for the SA8000 accredited certification program.
- 0.1.4 **Closure** (of a non-conformity) –Non-conformities shall not be closed by SAAS during the audit in which they were issued. SAAS shall require the CB to submit root cause analysis and evidence of containment and systemic corrective action, along with evidence of effective implementation for each non-conformity issued.
- 0.1.5 **Correction/containment** – Action to eliminate a detected non-conformity.
- 0.1.6 **Corrective action** – Action taken to eliminate the cause of a non-conformity upon undertaking a root cause analysis. It is the action taken to prevent recurrence of a non-conformity whereas preventive action is taken to prevent initial occurrence of the non-conformity. In the SAAS-accredited system, corrective action is undertaken to impact the entirety of the accredited management system. 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. A corrective action request (CAR) may be issued by SAAS as a means to initiate a required corrective action by the CB. A CAR is the initial stage in the corrective action process and requires containment, root cause analysis, corrective action and a review for effectiveness with supporting evidence.
- 0.1.7 **Critical non-conformity (CNC)** – A grievous breach of the certification or accreditation requirements that results in severe impact to SA8000, SAAS or SAI's reputation. Accreditation certificates may be denied, cancelled or suspended when CNCs are confirmed. A CNC may consist of the following situations:
- a. The CB lacks any reliable internal control (management) system, so its conformity with SAAS requirements cannot reasonably be ensured;
 - b. There is a complete breakdown of the CB's internal control (management) system, so its conformity with SAAS requirements cannot reasonably be ensured;
 - c. There is a complete breakdown or absence of the CB's verification activities (internal audit and management review), so its conformity with SAAS requirements cannot reasonably be ensured.
- 0.1.8 **Duplicate Audit** – An audit performed by SAAS Accreditation Auditors at an SA8000-Certified Organisation to verify the organisation's compliance with the SA8000 Standard. A duplicate audit may replace the SAAS routinely scheduled accreditation surveillance audit of the CB.
- 0.1.9 **Foreign Critical Location** - Refers to a CB's physical location outside of the Head Office, whatever the composition (office, person etc.) or legal relationship (contractor, franchisee etc.) of such location with the CB, where activities are conducted or controlled that determine or demonstrate the effectiveness of the CB's performance of the accredited certification, in particular:
- a. the process for initial qualification, training and ongoing monitoring of auditors and audit personnel

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records; or

- b. the application review, the assignment of audit personnel, and/or review of the final report; or
- c. the certification decision based on the final review of the audit report.

0.1.10 **Foreign Premises** – Refers to the CB’s premises at a physical location separate from the Head Office location, from which one or more key activities are performed. These premises are covered by the scope of SAAS accreditation. Key activities include:

- a. policy formulation
- b. process and/or procedure development
- c. contract review (as appropriate)
- d. audit planning and conduct of audits, as well as review, approval and decision-making regarding the results of audits

0.1.11 **Head Office** – The CB’s main operational office, which shall be responsible for managing the accredited certification-related activities. CBs SHALL have designated 1 staff person, an SA8000 Program Manager, to interface with SAAS. That person SHALL coordinate any questions and answers, scheduling, invoicing and other communication needed in order to correspond directly with SAAS and, if applicable, the SAAS-designated Client Manager. See Procedure 201B for Program Manager qualifications.

NOTE: CBs SHALL have designated 1 contact person or department at the Head Office to which SAAS invoices shall be sent. SAAS shall not send invoices to any other contact person or department. It is the responsibility of the nominated contact person or department to ensure that all invoices are paid in a timely manner. Failure to do so shall result in non-conformities being raised against the CB and possible suspension and withdrawal of SAAS Accreditation.

0.1.12 **Head Office Assessment** – A systematic and independent evaluation performed by SAAS at the CB’s main operational office. The audit determines whether the CB’s management system for operating a certification system is effectively implemented.

0.1.13 **Highest Risk, High Risk Countries** – SAAS developed a certification country risk audit process to categorize the oversight and assurance process activities according to risk level. Activities taking place in higher risk locations shall receive more oversight than those in countries determined to be lower risk. These countries have specific requirements for accredited SA8000 certification program, as determined by this risk audit. These countries can be found at <http://www.saasaccreditation.org/accreditation-requirements>.

0.1.14 **Initial audit** – Prior to granting accreditation, the process of evaluating an applicant CB’s suitability and readiness for accreditation SHALL be conducted through review of documentation, office audits and witnessed CB audits.

0.1.15 **Major non-conformity** – One of the following situations:

- a. The absence or total breakdown of a system to meet an accreditation 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 SAAS Lead Auditor indicates is likely either to result in the failure of the CB’s certification system or management system. Based on available objective evidence, this failure raises significant doubt as to the credibility of the certificates issued by the CB.
- 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.

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- d. A major non-conformity may be raised after the audit ONLY in the case where a SAAS auditor requires consultation with the SAAS head office.
- e. 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 CB's commitment to resolve the issue, SHALL lead to the CB being issued a warning and moved toward suspension.

0.1.16 **Market Surveillance Visit (MSV)** – A short (typically one-day) visit by SAAS to an SA8000-certified organisation to determine the strength and demonstration of implementation of the CB's SA8000 audit management system at client sites and the effectiveness of the accredited certification process.

- a. The objective of the MSV is to establish confidence in the CB's certification process by direct observations carried out during visits to a sample of its certified organisations, to use the results to define appropriate levels of surveillance of the CB's activities, and to improve the overall credibility of the accredited SA8000 certification system. It is designed to show how well the system works and provide assurance of the quality of the SA8000 system.
- b. This visit consists of a high level look at the certified organisation and is typically a short, one-day visit to a certified client to determine the level of confidence in the conformity of the management system to SA8000 requirements and the effectiveness of the accredited certification process by the CB.

NOTE: A market surveillance visit is not a "duplicate audit." The visit is intended only to strengthen SAAS's confidence in the activities of the CB.

0.1.17 **Minor non-conformity** –

- a. A failure or oversight in some part of the CB's management system relative to the requirements for accreditation which is not systemic in nature;
- b. A single observed lapse in following one item of the CB's management system; such lapses do not represent a breakdown of the CB's systems or raise significant doubt about the credibility of certificates issued by the CB.

0.1.18 **Non-conformity (NC)** – If fulfilment of specified requirements have not been demonstrated, a finding of non-conformity SHALL be reported. Also referred to as a non-conformance. 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. The process required by SAAS of the CBs SHALL include containment/correction, root cause analysis, corrective action and follow-up. NCs SHALL be logged using a nonconformance report (NCR) to log and track occurrence of NCs.

0.1.19 **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 CB what to do (i.e. consultancy). Any negative finding of a potential non-conformity shall be classified as an OFI (see definition of preventive action). OFIs are documented within the body of the SAAS accreditation report. Additionally, SAAS may include Observations– this is where SAAS can comment on best practice and ensure a value added component to each audit.

0.1.20 **Outsourcing/Subcontracting** – As defined in ISO 17021-1:2015 - 7.5.1 to 7.5.4, outsourcing is subcontracting work to another organisation to conduct certification activities on behalf of the accredited Certification Body. For SAAS purposes, the terms "outsourcing" and "subcontracting" are synonyms. "Partners," as defined by some CBs to deliver certification activities, including marketing, SHALL be recognized as subcontracting. This definition does not include contracted services by individual auditors and/or technical experts. See also Annex A - ISO17021-1:2015 - SAAS ACCREDITATION ADDITIONAL REQUIREMENTS, element 7.5 in this document.

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- 0.1.21 **Pre-Assessment Audit** - A pre-assessment audit is an audit with a specific objective related to the verification of an implemented system.
- 0.1.22 **Preventive action** – Action taken to eliminate the cause of a potential non-conformity or other adverse situation.
- 0.1.23 **Remote Audit** – A limited-scope document review of policies, documents and records that is not conducted on the premises of the CB. Remote audits may be used at the discretion of SAAS in situations such as expansion of scope; CB's with very few SA8000-certified clients; transition to new SA8000 standard version; review of evidence for closure of NCs and other situations as may arise.
- 0.1.24 **Review of Documentation** – Process of comparing the requirements in the applicant's certification and management systems documentation to the accreditation criteria. Also known as a document review or desk review. This is conducted remotely, during an off-site audit. The purpose of the document review is to review all relevant documents and records supplied by the CB to evaluate its system for conformity with the requirements of ISO/IEC 17021, SAAS Procedure 200 and other applicable procedures and guidance.
- 0.1.25 **Root Cause Analysis** – A method of problem solving used for identifying the root causes of faults or problems. CBs are expected to use Root Cause Analysis to address NCs to look deeper into problems and find out why they're happening. The process of Root Cause Analysis helps guide people to discover and understand the initiating causes of a problem, with the goal of determining missing or inadequately applied controls that will prevent recurrence. [See also ISO/IEC 17021-1:2015 Clause 9.4.9 Cause analysis of nonconformities].
- 0.1.26 **SAAS Client Manager (SAAS-CM)** – In most cases SAAS assigns CBs a SAAS-CM for the accreditation period, who manages communication and workflow. In the case of some smaller CBs, or at the discretion of SAAS, the role of CM may be taken by any SAAS LA or the SAAS-PC. The SAAS-CM conducts office audits, manages the witnessed audit process, investigates complaints, and works directly with the CB to address technical questions about its systems. The SAAS-CM conducts many of the CB's audits, but other auditors may also participate during the accreditation cycle. In most cases, the CB shall be transferred to a new SAAS-CM during the reaccreditation office audit. The original SAAS-CM shall then be re-assigned to a new CB.
- 0.1.27 **SAAS Social Certification Program Coordinator (SAAS-PC)** –The SAAS-PC is responsible for managing the coordination, scheduling, and reporting related to oversight of SAAS-accredited Certification Bodies.
- 0.1.28 **SA8000 Certification Program** –SAAS oversees and grants accreditation for this certification program. The program encompasses all the requirements and processes for assessing conformance to the Standard and providing SA8000 certification, including the SA8000 Standard, SAAS Procedure 200, other documents that specify the requirements for conformity audits, and other requirements applicable to SAAS and the CB.
- 0.1.29 **Suspension of Accreditation** – Temporary restriction on the accredited services that a CB may provide. While accreditation for SA8000 is suspended, a CB may not issue any initial SAAS-accredited certificates nor accept new SA8000 clients. However, the CB shall be required to continue providing services to existing SA8000 clients.
- 0.1.30 **Withdrawal (Cancellation) of Accreditation** – Termination of a CB's accreditation. The CB SHALL be required to return the certificate of accreditation to SAAS, terminate any use of the SAAS logo, remove any reference to accredited status, and withdraw accredited certificates. A notification of withdrawal shall be published at <http://www.saasaccreditation.org/accredcertbodies>.
- 0.1.31 **Witnessed CB Audit** – A SAAS audit team SHALL witness an SA8000 audit to determine the CB audit team's competence to conduct the audit. Under most circumstances, this will be announced. There may be limited circumstances when an unannounced witness audit may be required. An

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344 unannounced witness is a witnessed audit that SAAS conducts without previously notifying the CB of
345 the date. SAAS will arrive at an audit site without giving the CB prior notice and proceed with a
346 witnessed audit. If SAAS chooses to use this type of audit, it SHALL collect the audit schedule from
347 the CB and provide a proposed SAAS audit team to the CB.
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349 Note: For additional terms and definitions, please refer to SA8000:2014, Procedure 200:2015, ISO/IEC
350 17021-1:2015 and ISO/IEC 17000:2004. For terms and definitions specific to the Social Fingerprint
351 process, please refer to the SA8000:2014 Social Fingerprint Glossary.
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1. ACCREDITATION CRITERIA AND PROCESS

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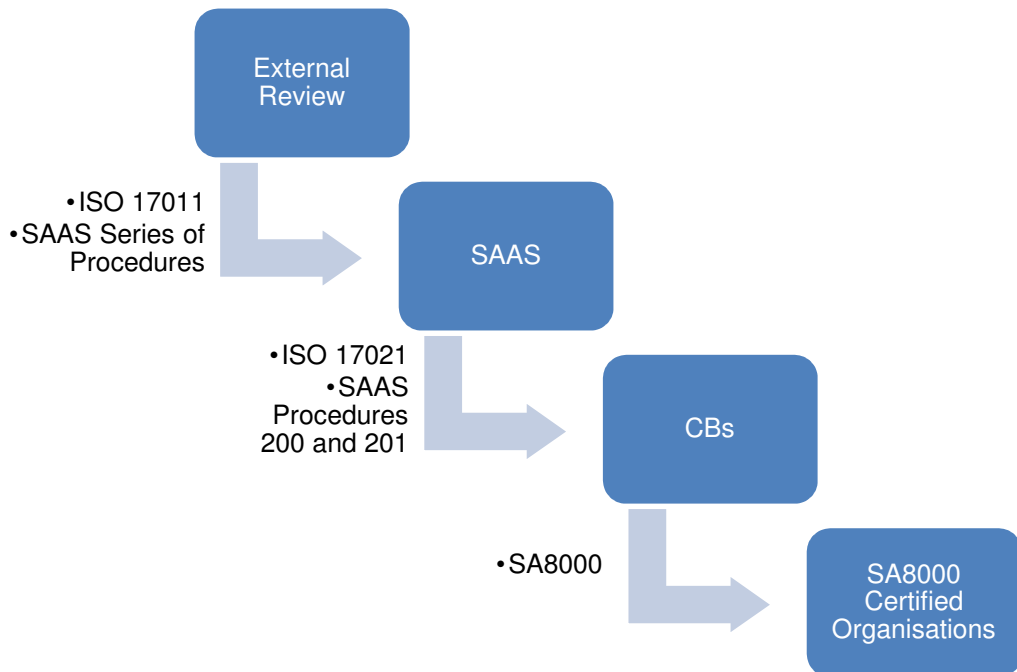
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1.1. SAAS ACCREDITATION

In order to ensure the integrity of the SA8000 social accountability certification system, it is essential for stakeholders to have assurance of the competence of SAAS-accredited CBs to certify organisations to SA8000. Thus, SAAS participates in an impartial verification process of accredited CBs' competence (Figure 2). When granted, SAAS accreditation for the SA8000 program is generally valid for a period of four years.

SAAS conducts internal audits and management reviews of its internal accreditation process and participates in an external evaluation system in compliance with recommendations by the ISEAL Alliance. This process ensures that SAAS operates in accordance with ISO/IEC 17011:2004.



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Figure 2 SAAS Accreditation Interactions

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1.2. ROUTES TO SAAS ACCREDITATION

CB's have the option of requesting two different routes to gain SAAS SA8000 Accreditation.

1.2.1 **Route 1:** A CB may request that SAAS consider a reduced audit effort due to the fact that the CB is already accredited to ISO/IEC 17021-1:2015 by an IAF-member National Accreditation Body. This approach is intended to reduce the amount of time that CBs spend satisfying multiple accreditation body audits.

For SAAS to consider this request, the CB shall comply with the requirements below.

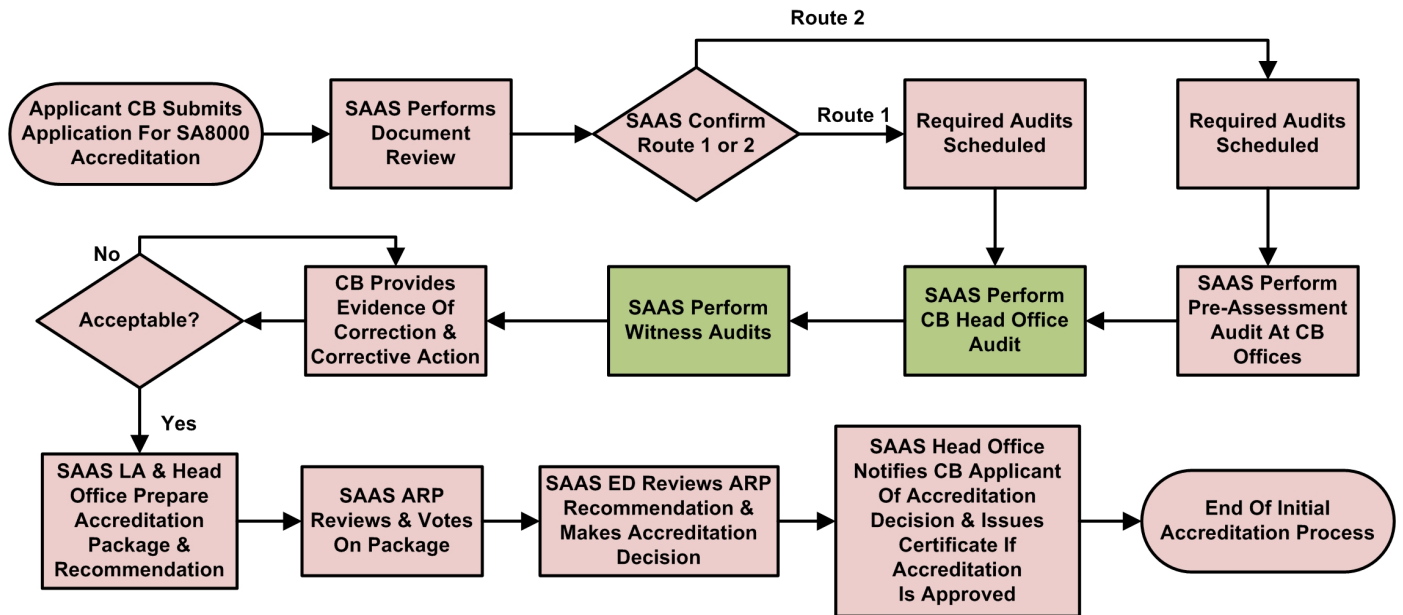
- a) The CB's certifying office's accreditation shall encompass a common management system among all the offices of the CB that will deliver/delivers SA8000 and other management systems certifications, such as ISO 9001.
- b) For SAAS to consider a CB's request for a Route 1 approach, they SHALL provide copies of all of the following documents. Failure to do so, or if SAAS judges that the information provided is inadequate, this SHALL result in the Applicant Organisation proceeding via Route 2. Copies of the documents described below SHALL be submitted with the completed SAAS Application for Accreditation.
 1. A valid Accreditation Certificate
 2. Copies of the accreditation reports from the other accreditation body, in English, for their current accreditation cycle.
 3. A written declaration that since the last accreditation agency audit, the CB has no open major non-conformities, is not suspended by the accreditation agency, nor subject to a major complaint against it. The CB shall also be responsible for reporting to SAAS any major non-conformities, suspensions or complaints related to its IAF member accreditation.
- c) Additionally, the CB SHALL share all accreditation reports in English with SAAS during all Head/Regional office audits and upon request by SAAS.

1.2.2 **Route 2:** The conventional method of accreditation that reviews all aspects of the CB's organisation to ISO/IEC 17021-1:2015. Route 2 shall be used for all applicant CBs that do not have an accreditation from an IAF-member National Accreditation Body and/or are unable to satisfy the criteria above.

1.2.3 The general process for the SAAS initial accreditation process for all CBs is illustrated below in Figure 3. This process applies for Route 1 and 2; however, Route 1 can lead to reduced SAAS audit time, as generally described in Figure 4 below. Figure 3 shall also apply to the ongoing surveillance and reaccreditation of CBs, though exceptions and variables shall apply at different points in the process. Upon the decision to grant accreditation, the accreditation cycle shall generally be for a period of four years, with required ongoing oversight and surveillance audits throughout the cycle to ensure compliance with accreditation criteria.

Note: SAAS performs an ongoing risk audit of all applicant and accredited CBs. Higher-risk CBs [e.g. CBs with a high number of non-conformities, complaints, or other concerns each year] shall require more monitoring/surveillance audits.

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Figure 3 - CB Accreditation Process

SAAS Estimated Initial Accreditation Audit Effort in Audit Days		
Activity	Route 1	Route 2
Application Review	1	1
Pre-Assessment	N/A	2
Document Review	1	2
Head Office Audit	4	4
Witness Audit	2	2
Accreditation Package Review	1	2
Annual Surveillance Head Office	1	2
Total Days	10	15

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Figure 4 – Estimate of Initial Accreditation Audit Days

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1.3. APPLICATION FOR ACCREDITATION

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1.3.1. Information about the application process is available on the SAAS website:
<http://www.saasaccreditation.org/apply>.

1.3.2. Formal applications for accreditation shall be sent electronically via email to:
saas@saasaccreditation.org.

1.3.3. New CBs applying for accreditation SHALL provide evidence of conformance to the SAAS accreditation requirements.

- a) When the accreditation application is deemed complete, with all required supporting documentation and completed application form (including information to support a CBs request to follow Route 1, as applicable), SAAS staff shall review the application to confirm that the CB has the appropriate policies, scope and competencies.
- b) SAAS shall also confirm that it has the capacity to provide the necessary services to the CB with available competent auditors and experts. SAAS shall then accept the application and notify the CB of the acceptance in writing.

1.3.4. At any point in the application process, SAAS may determine that the CB does not have the potential to meet the accreditation requirements. Criteria for this negative SAAS determination may include:

- Non-fulfillment of requirements
- Inability to achieve accreditation
- Ethical/Transparency/Impartiality issues.

- a) SAAS SHALL inform the CB in writing that the application process has been terminated and cannot be considered further and provide an explanation of the reason(s). Application fees shall not be refunded.
- b) If a CB wishes to reapply for accreditation, it shall be required to submit a new application with supporting documentation and pay the application fee again. SAAS may impose a 2-year timeframe at the end of which the applicant CB may be invited to then reapply.

1.3.5. The CB shall actively support the initial audit process by participating in all required accreditation activities. For example, the CB SHALL provide additional information when requested, respond to requests for corrective action, arrange for office audits, and arrange for suitable audits for SAAS to witness.

1.3.6. If a CB is unable to achieve accreditation within one year of SAAS acceptance of the application, SAAS may change the applicant CB's status to "inactive."

- a) In such cases, SAAS shall notify the CB of the impending change of status approximately 30 days in advance.
- b) An inactive status indicates that the application process is no longer moving forward and the CB is no longer being considered for accreditation by SAAS.
- c) To return to active status, the CB shall reapply for accreditation and provide any additional documentation that SAAS deems necessary. The re-application may include additional fees.

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1.4. GENERAL PROCESS REQUIREMENTS FOR SAAS ACCREDITATION

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1.4.1. Upon acceptance of the application for accreditation, SAAS SHALL conduct an audit of the applicant CB in 3 parts, at minimum, as part of the initial accreditation process:

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a) a document review,

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b) an office audit and

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c) a witnessed audit at an SA8000 client.

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d) an on-site pre-assessment may be required for those CBs following Route 2.

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1.4.2. SAAS audits are administered through the SAAS Program Coordinator (SAAS-PC).

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1.4.3. SAAS staff, accreditation auditors, and the CB SHALL communicate via the SAAS-PC and send copies of the audit information and related documentation to the SAAS-PC.

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1.4.4. The SAAS-PC generates email confirmation, preparatory materials and other supporting documentation to the CB and SAAS audit team to confirm the audit and outline the necessary logistical details.

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1.4.5. The CB SHALL send required pre-audit documentation to the SAAS-PC via email by the date indicated in the e-mail confirmation.

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1.4.6. The SAAS audit teams SHALL prepare reports on the result of each part of the audit process (document review, office audit, and witness audit). The SAAS-PC SHALL communicate such information to the CB.

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1.4.7. All identified non-conformities and their responses SHALL be documented and sent to the SAAS-PC who SHALL document and retain evidence of all CB responses to identified non-conformities. The CB SHALL submit evidence of effective implementation of acceptable containment, correction and corrective actions to the SAAS-PC.

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1.4.8. CBs are generally assigned to a SAAS Client Manager (SAAS-CM) during the application process. The SAAS-CM rotates after every four-year accreditation cycle. The SAAS Head Office SHALL also rotate other SAAS Accreditation Auditors that are part of the audit team to maintain the objectivity of SAAS Accreditation Audits.

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1.4.9. If the CB submits a written objection concerning any audit team member, the SAAS Executive Director SHALL assess validity of the objection using the following criteria: conflict of interest or other perceived conflict.

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a) Objections shall not be considered in relation to location of the SAAS auditor or other such related travel issues.

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b) If SAAS deems the objection to be valid, it SHALL not assign the individual to the team.

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1.4.10. The CB SHALL have enforceable arrangements with the organisations that it audits for accredited certification that allow SAAS to witness the CB's audit team, whether announced or unannounced, performing audits on-site, as needed. SAAS shall notify the CB when it wishes to perform a witness audit and the CB may then inform their client of SAAS's intention to witness that audit. *Note: Under exceptional circumstances, at initial accreditation and/or throughout the accreditation cycle, a witness audit by SAAS may be unannounced from the CB Client's perspective.*

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1.4.11. During the application process, the CB SHALL have a client willing to undergo the SA8000 certification process. See the section on Witness Audits (1.5.10) for further details.

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1.5. INITIAL ASSESSMENT OF CB

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- 1.5.1. Upon acceptance of a CB's application, SAAS SHALL assign the application to a SAAS-CM who shall be the lead auditor throughout the initial application audit process. Under some circumstances the SAAS-PC shall appoint the lead auditor, rather than the SAAS-CM, for the initial accreditation process.
- 1.5.2. SAAS SHALL assign at least one other audit team member to the CB to participate in the initial accreditation process with the SAAS-CM. When selecting the audit team for each audit, SAAS SHALL ensure that the skills brought to the audit are appropriate as per SAAS procedures. As well as technical expertise, auditors are selected based on the following criteria:
- a) Lack of conflict of interest
 - b) Availability
 - c) Expertise in issues of concern
 - d) Expertise in local industry
 - e) Location
 - f) Knowledge of local language
- 1.5.3. SAAS SHALL conduct the initial accreditation audits of CBs; however, under limited circumstances and as part of a pilot program, SAAS may consider joint audit teams with other accreditation bodies.
- 1.5.4. SAAS audit team members SHALL not have relationships with the applicant that could influence their audits and SHALL be required to proactively declare to SAAS that there is no conflict of interest prior to accepting the assignment. Team members SHALL keep all knowledge and information obtained about the applicant and its operations confidential.
- 1.5.5. SAAS SHALL evaluate the CB's management processes to ensure its competence in relation to accreditation requirements for the SA8000 certification system. Throughout this process, accreditation auditors shall ascertain whether the CB has effective processes in place to ensure the competence of its personnel (including competence related to the SA8000 Performance Indicators Annex). If evidence of their competence cannot be provided, the accreditation auditor SHALL raise a non-conformity citing the CB's failure to demonstrate competence with respect to the Standard and associated documentation.
- 1.5.6 The evaluation by the SAAS audit team SHALL consist of: a document review, [pre-assessment if applicable], office audit and witnessed CB audit as part of the audit for initial accreditation.
- a) The SAAS Lead Auditor (LA) SHALL conduct the accreditation process per SAAS Work Instructions.
 - b) In the case that the SAAS audit team does not speak the local language, an independent interpreter shall be present. Interpreters and translators shall be provided by SAAS whenever possible and charged out to the CB. If this is not possible, the CB, in conjunction and upon approval by SAAS, shall arrange for the hiring of an independent and professional interpreter free from any conflict of interest.
 - c) With the applicant CB, the SAAS LA, in consultation with SAAS-Program Coordinator (PC), SHALL establish the audit date and locations for the on-site (pre-assessment, office and witnessed) audits.
 - d) For each part of the process, after the conclusion of each audit activity, the SAAS LA shall prepare an audit report, including the audit details, non-conformities issued and concerns identified, and conclusions reached by the audit team.
 - e) Non-conformities (which SHALL require correction and corrective action by the applicant) SHALL be documented and included as part of the report. The audit report shall also include

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the team's concerns and opportunities for improvement; however, they do not necessarily require a formal response.

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606 1.5.7 Document Review: The document review SHALL consist of a review of the application materials,
607 documented procedures and other evidence of compliance to requirements submitted by the
608 applicant. The SAAS LA SHALL conduct the document review to evaluate the applicant's
609 submitted documentation and determine if the applicant has satisfactorily integrated the
610 requirements for accreditation into its management system and operating procedures.
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612 a) The CB SHALL be informed of the identity of the proposed members of the SAAS audit team,
613 including any technical experts. The CB has the opportunity to raise objections to any team
614 member at this point.
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616 b) The SAAS LA SHALL review the submitted policies, procedures and other supporting
617 documents and assess completeness and compliance with ISO 17021-1 and SAAS Procedure
618 200. As a result, the SAAS LA SHALL issue a report with the outcome of the document
619 review. The applicant may be required to provide clarifications and corrections before the
620 accreditation process proceeds.
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622 c) As a result of the document review, the SAAS Head Office SHALL confirm whether the
623 applicant CB can progress via Route 1 if they have requested to do so.
624
625 d) If the decision from the document review is that further action is required for the documentation
626 before on-site accreditation audits may proceed, the CB shall be contacted and appropriate
627 arrangements made to resubmit documentation. This process shall continue until the
628 documentation is acceptable, the CB decides to withdraw its application or SAAS suspends
629 the application process.
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631 e) SAAS may decide not to proceed with an on-site office and witness audit based on
632 deficiencies found during the document review. The applicant shall be notified of this decision
633 and shall have the opportunity to appeal.
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- 635 1.5.8. Pre-Assessment: For those applicant CBs following Route 2, SAAS shall require an on-site pre-
636 assessment audit. The pre-assessment audit is a trial run in order to see if the applicant CB is
637 "ready" for their accreditation office and witness audits and seeks to determine the degree to which
638 the CB's documented management system conforms to ISO 17021-1:2015, Procedure 200 and
639 SAAS Procedure 201A.
640
641 a) The pre-assessment is unique in that there are no formal corrective actions as an outcome but
642 a better understanding of what the SAAS auditors are looking for.
643
644 b) The SAAS Pre-Assessment Audit shall consist of:
645 i. A formal opening meeting
646 ii. A full evaluation of the organisation management system to ISO 17021-1:2015,
647 Procedure 200 and SAAS Procedure 201A.
648 iii. Identification of the working and non-working systems
649 iv. A formal closing meeting
650 v. A comprehensive report
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652 c) The SAAS pre-assessment audit report identifies potential non-conformities, which the CB shall
653 have the opportunity to address prior to the initial accreditation office audit. However, the pre-
654 assessment audit report shall not include suggestions of how to do so. The pre-assessment
655 audit is mandatory for all CBs following Route 2 for accreditation.
656
- 657 1.5.9. Office audit: SAAS accreditation auditors SHALL conduct an on-site audit at the applicant CB's
658 designated head office to review the organisation's documented management system policies,
659 procedures, documents and files, and conduct interviews with staff and auditors.
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- a) Office audits provide assurance that a SAAS applicant or accredited CB manages their certification activities in compliance with SAAS requirements. SAAS office audits also confirm that the CB's nominated Head Office is communicating effectively with its local offices and that there is a system for the global management of SAAS accredited certification programs.
- b) SAAS auditors SHALL review that any non-conformities raised by SAAS have been analyzed for root causes and the appropriate corrective and preventive action undertaken. SAAS auditors SHALL verify that all associated personnel and auditors, including those in remote locations, are given the necessary support by their accredited CB to perform effective and consistent certification audits in line with SAAS requirements. SAAS auditors SHALL understand and confirm the lines of authority and responsibility from the Head Office to remote locations.
- c) During an office audit, SAAS accreditation auditors review the CB's procedures, documents, work instructions and files as well as conduct interviews with appropriate staff and auditors. When undertaken, the main objective of a SAAS Regional/Local Office Assessment audit is to provide assurance that the CB Head Office is communicating effectively with their local office and that the systems in place for the global management of SAAS accredited certification program is effective, robust and consistent.
- d) On-Site Office Audit Process:
 - i. For CBs utilizing Route 2, the SAAS-PC, with the SAAS-CM, SHALL arrange a pre-assessment audit at the CB's Head Office. SAAS SHALL confirm the date of the audit in writing to the applicant, including a request for details on logistical arrangements. After the on-site pre-assessment audit, the SAAS LA SHALL prepare a pre-assessment report, which includes the details of the audit, a discussion of potential non-conformities and concerns identified, and conclusions reached by the audit team. Potential non-conformities SHALL be addressed by the applicant prior to the office audit.
 - ii. For CBs utilizing Route 1, a pre-assessment may not be necessary as long as the IAF-member accreditation report has been submitted to SAAS for review as part of the application materials and document review.
 - iii. Upon completion of the pre-assessment process, as necessary, the SAAS LA, with the SAAS-CM, shall arrange a mutually acceptable schedule for the office audit(s). SAAS SHALL confirm this schedule in writing with the applicant CB, including a request for details on logistical arrangements and any other information required to carry out the audit process. In addition, the applicant shall be informed of the SAAS plan for the office audit and the SAAS audit protocol.
 - iv. In addition to the CB's head office, other office locations are also subject to audit if they are considered "critical," as defined in the IAF GD 3:2003 documents on cross-frontier accreditation.
 - v. Prior to conducting the office audit for initial accreditation, the applicant SHALL have conducted a complete internal audit (all elements of the management system) and at least one complete management review.

- 1.5.10. Witness Audit: During a witnessed audit, SAAS auditors observe the CB's SA8000 auditors performing an SA8000 audit to confirm that the CB's procedures are effective in delivering credible, consistent and robust SA8000 audits.
- a) Upon completion of the office audit process, the SAAS LA, with the SAAS-CM, shall arrange a mutually acceptable schedule for the SA8000 witness audit. SAAS SHALL confirm this schedule in writing with the applicant CB, including a request for details on logistical arrangements, the applicant CB's audit team qualifications, details of the applicant CB's audit plan, and any other information required to carry out the audit process.

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- b) SAAS SHALL witness the CB's audit team conducting a complete Stage 2 SA8000 audit for the initial witnessed CB audit. *Note: Under some circumstances throughout the accreditation cycle, SAAS may request a CB witness audit to take place during a Stage 1 SA8000 audit.*
- i. At initial accreditation, and throughout the accreditation cycle, the CB shall notify SAAS if the client organisation refuses a witnessed audit.
 - ii. If the client organisation chooses to transfer to another CB to avoid the witnessed audit, it cannot receive a SAAS-accredited SA8000 certificate.
- c) For witnessed audits, the number of members of the SAAS audit team should equal the number of members of the CB's audit team. In most circumstances, a one-person CB audit team is not acceptable for an initial accreditation witnessed audit.
- d) Prior to the witnessed Stage 2 SA8000 audit, the CB applicant SHALL provide the SAAS audit team with evidence of the completed document review and conclusions from the Stage 1 SA8000 audit, including the CB auditors' path notes. The procedure for conducting the Stage 1 SA8000 audit by the CB SHALL have addressed the outcome of the SAAS document review so as to take into account comments and findings and required revisions to comply with Procedure 200.
- e) As with all SA8000 audits, during the SAAS witnessed audit, the witnessed client organisation SHALL remain responsible for the safety of the audit teams.
- i. The SA8000 LA and/or SAAS Accreditation Auditor SHALL be expected to take immediate action as needed at any point during the audit to avoid injury; this may necessitate the team's departure from the area or the organisation's site if necessary.
 - ii. The SA8000 LA and/or SAAS Accreditation Auditor shall abide by the organisation's safety rules as he or she becomes aware of them.
 - iii. If the SAAS LA observes a hazard that he or she considers to be an imminent risk of high severity to health and safety during the witnessed audit, the SAAS LA SHALL request an immediate meeting with the CB's audit team leader to inform him or her of the hazard.
 - iv. The CB's audit team leader is expected to address the hazard with the organisation in accordance with the CB's processes.
- f) When evaluating an individual or audit team's awareness and competence with respect to SA8000 technical issues (including the SA8000 Performance Indicator Annex), accreditation auditors SHALL:
- i. Raise an awareness/competence-related non-conformance against ISO 17021 paragraph 7.1 or 7.2 *only* if the CB team/individual shows a failure to consider, or consistent or blatant disregard for audit evidence which has a potential negative consequence for workers, in the reasonable judgment of the accreditation auditor (e.g. an issue that jeopardizes the integrity of the certification audit).
 - ii. Avoid raising an awareness/competence-related non-conformance due to the absence of evidence that a particular performance indicator was evaluated during the audit. (i.e. It would be inappropriate for accreditation auditors to use the annex as a 'completeness' checklist.)
- g) SAAS auditors do not normally interfere with the CB's SA8000 audit and do not intervene in the audit process until after the closing meeting with the client. However, if during the SA8000 audit a situation arises wherein the non-identification of certain critical deviations by the CB is likely to compromise the results of the audit, the SAAS auditor may intervene and seek a course correction. Such an action shall be recorded and issued as a CAR by the SAAS auditor even after the correction is made by the CB.
- h) Under all circumstances, the SAAS audit report and non-conformities (NCs) of a CB's witnessed audit SHALL be written in terms of the management systems requirements, certification requirements, and accreditation requirements.

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- i) The SAAS witnessed audit SHALL not be complete until the SAAS LA receives and evaluates the CB's SA8000 audit report. 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
- 1.5.11. The SAAS LA SHALL submit a copy of each accreditation audit report to the SAAS-PC, who is then responsible for distributing it to the CB after technical and content review by SAAS personnel.
- 1.5.12. Evidence of the CB's implementation of acceptable correction and corrective action for all non-conformities SHALL be required before SAAS can initiate the initial accreditation decision process. SAAS acceptance of the CB's responses shall be based on a review by the SAAS audit team and appropriate SAAS personnel. Follow-up audits and/or additional audits may be required. SAAS SHALL communicate the results of all reviews to the applicant in writing.
- 1.5.13. Initial audits SHALL occur within the 12-month period preceding the accreditation decision. If any audit occurred more than 12 months prior to the accreditation decision, SAAS may require a follow-up audit.
- 1.5.14. In most circumstances, the applicant CB shall complete the initial accreditation process within one year of the date of SAAS's acceptance of the application. If the applicant does not successfully complete the process within one year, SAAS may place the CB on "inactive" status.

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1.6. INITIAL ACCREDITATION DECISION PROCESS

- 1.6.1. If the accreditation audit team's conclusions regarding the effectiveness of the CB's SA8000 certification system are satisfactory and SAAS staff conclude that all other requirements have been met (including the management of all non-conformities and payment of invoices), SAAS staff SHALL prepare an accreditation package for consideration by the SAAS ARP. The package SHALL include a summary of the CB's application information; copies of audit reports; all non-conformities issued, including the CB's responses and SAAS review of the responses; and a SAAS executive summary of the accreditation activity, along with the SAAS LA's recommendation.
- 1.6.2. SAAS ARP voting SHALL be governed by the SAAS Operating Procedure 303 and ARP Terms of Reference, which can be found at <http://www.saasaccreditation.org/accreditation-review-panel>.
- 1.6.3. If the SAAS ARP vote is in favor of initial accreditation, the recommendation SHALL be communicated to SAAS staff. The SAAS ARP may recommend imposing certain conditions to accredit the applicant CB. The newly accredited CB SHALL have the duty to ensure that those conditions are met.
- 1.6.4. If the SAAS ARP votes against initial accreditation, the SAAS Executive Director SHALL be notified and informed of the reason(s) for the recommendation.
- 1.6.5. In all circumstances, the SAAS Executive Director SHALL render a final decision based on the recommendation by the Lead Auditor and the ARP, as well as the results of the audit.
- 1.6.6. SAAS staff SHALL notify the CB applicant of this decision and any next steps, in writing. The applicant may appeal the decision should initial accreditation not be granted.
- 1.6.7. Under all circumstances applicants shall pay SAAS fees and any audit expenses associated with the accreditation activity, even those CBs where accreditation is not granted.

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1.7. INITIAL ACCREDITATION

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- 1.7.1. Upon receipt of a positive decision by the SAAS Executive Director, SAAS staff SHALL prepare a certificate of accreditation for the CB upon receipt of one duly executed copy of the Accreditation Agreement, signed by a company officer on behalf of the CB, and payment of any overdue unpaid invoices.
- 1.7.2. SAAS SHALL update the published list of accredited CBs on the SAAS website when a new CB is accredited: <http://www.saasaccreditation.org/accredcertbodies>.
- 1.7.3. SAAS SHALL send the certificate of accreditation and SAAS accreditation mark to the CB.
- 1.7.4. The certificate of accreditation SHALL include: the scope of accreditation, issue date, initial accreditation date, expiration date, and an annex with CB locations (with critical locations and subcontracted locations identified) and countries in which the CB has demonstrated that it is competent to deliver SAAS-Accredited SA8000 certification. The accreditation certificate information and annex SHALL be made publicly available on the SAAS website. See Annex A - ISO17021-1:2015 - SAAS ACCREDITATION ADDITIONAL REQUIREMENTS for additional information on scope of accreditation.

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1.8. CERTIFICATES ISSUED PRIOR TO ACCREDITATION

- 1.8.1. A newly-accredited CB may issue SAAS-accredited SA8000 certificates only after it has received formal recognition of accreditation from SAAS, including a signed agreement and accreditation certificate.
- 1.8.2. After the CB receives formal recognition of accreditation from SAAS, the CB SHALL then issue SAAS-accredited SA8000 certificates to clients that participated in the initial CB witnessed audit, as well as any clients that are subsequently audited and certified by the CB within the scope of its SAAS accreditation.
- 1.8.3. Upon request and explicit approval by SAAS, and only after the successful completion of the document review, a CB may issue unaccredited SA8000 certificates to a maximum of 2 clients prior to the witnessed audit(s) for initial accreditation in order to refine its SA8000 certification audit methodology. The audit process SHALL adhere to the requirements found in Procedure 200.
- a) The CB SHALL re-issue these clients' SA8000 certificates with the SAAS mark following the completion of a satisfactory surveillance or recertification audit after the date that SAAS granted the CB accreditation. Should the applicant CB not become accredited, the clients SHALL be immediately referred to accredited CBs to undertake a new SA8000 audit. Under these circumstances, the accredited CB accepting the client shall contact SAAS to further review how to manage this unaccredited SA8000 client.
 - b) Unaccredited SA8000 certificates SHALL NOT contain the SAAS accreditation mark and SHALL only be valid for a maximum of 6 months from the date of issue. They SHALL also contain the following paragraph prominently displayed:

"This Certificate has been issued by a Certification Body currently undergoing SAAS Accreditation and is valid for six months from issue, after which time it is considered EXPIRED. 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."
 - c) No currently accredited CB, subcontracted auditing company working with an accredited CB or applicant CB SHALL have active unaccredited SA8000 certificates outside of the parameters above.
- 1.8.4. A CB SHALL not issue or re-issue an accredited certificate with a date that is prior to the date that the CB attained SAAS accreditation.
- 1.8.5. SAAS shall inform the newly-accredited CB of the date after which it may issue or re-issue certificates with the SAAS mark.

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1.9. CONTINUANCE OF ACCREDITATION

- 1.9.1. SAAS SHALL continuously monitor and evaluate the accredited CB's conformity to the accreditation criteria, reference documents, and other requirements throughout the four-year term of accreditation. This includes periodic office audits and witnessed audits to monitor select requirements. The audit processes identified in the Initial Assessment of a CB process above SHALL be followed.
- 1.9.2. SAAS SHALL conduct a minimum of 1 head office audit annually.
- a) SAAS SHALL conduct the first head office audit approximately six months after initial accreditation has been granted, or 12 months after the initial accreditation head office audit, whichever occurs first.
 - b) After the first one, head office audits shall be conducted approximately every 12 months.
 - c) Head office audits are targeted to be scheduled six months prior to the expiration of accreditation.
 - d) SAAS reserves the right to conduct unscheduled office audits at times other than those stated.
 - e) CBs SHALL make available to the SAAS LA a copy of all SA8000-related policies and procedures in advance of the head office audit.
- 1.9.3. SAAS SHALL audit additional CB office locations on a sampling basis throughout the CB's accreditation cycle. Offices within the scope of the CB's SA8000 activity SHALL be audited based on data provided by CBs to specify and identify their locations of critical activity.
- a) In addition to the head office, SAAS SHALL select a sampling of local and regional offices to visit throughout the four-year term of accreditation. CB offices SHALL typically be subject to sampling within the 4-year cycle at a minimum of one time per accreditation cycle at those locations for which the answer is YES to any one or more of the questions below:
 1. Office has staff with the authority to make SA8000 certification decisions.
 2. Office has staff with the authority to manage the investigation of and report on SA8000 complaints.
 3. Office has staff with the authority to qualify SA8000 auditors.
 4. Office is located in a country that appears on the high and highest risk country list.
 - b) CB offices SHALL also be subject to audits based on risk and sampling so as to provide assurance that the CB is communicating effectively with its local offices and maintain an effective global management system.
 - c) The criteria above SHALL be used to identify office audits regardless of the ownership structure within the CB – specifically, this criteria SHALL also be used for those organisations/offices that have a subcontract agreement with the SAAS accredited CB.
- 1.9.4. SAAS SHALL conduct 2 SA8000 witnessed audits, at minimum, annually, but reserves the right to witness additional CB audits as deemed necessary.
- a) The frequency of witnessed audits SHALL be based on a number of factors including: CB organizational and management structure, level of audit activity, location of audit activity, non-conformities issued, complaints received, and other relevant factors.
 - b) Witnessed audits may be of routine surveillance audits of clients; however, during the 4-year accreditation cycle, one witnessed audit SHALL evaluate the CB's SA8000 recertification process, and one witnessed audit SHALL evaluate the CB's initial audit process during a Stage 2 SA8000 audit, provided the CB has a new client within the 4-year cycle.

- c) SAAS guidelines for selecting the witnessed audits may include but are not limited to: diversity of technical area, audit type, office audit results, and existence of complaints.
- d) Individual witnessed audit sites SHALL be selected by SAAS in order to witness a wide spectrum of organisations and auditors in witness audits for a CB over an accreditation cycle.
- e) CBs SHALL make available to the SAAS LA a master list showing the current revision level of all SA8000-related policies and procedures to assure effective document control.

1.9.5. A SAAS audit team consisting of two accreditation auditors SHALL witness a CB team of two or more auditors at least once during the accreditation period.

1.9.6. The SAAS ARP provides a recommendation to SAAS staff to make final decisions about continuation of a CB's accreditation within the four-year accreditation period based on the satisfactory results of the SAAS CB surveillance audits, or the satisfactory correction and corrective actions for any non-conformities. Unsatisfactory results during the accreditation period may necessitate increased surveillance of the CB, or suspension or withdrawal of accreditation.

1.9.7. SAAS CB surveillance audits SHALL utilize a combination of the methodologies in Figure 5:

SA8000 Witness Audits	Head Office Audits
SA8000 Duplicate Audits	Regional Office Audits
Market Surveillance Visits	CB Partner/Subcontractor Office Audits
Document Reviews	Remote Office Audits

Figure 5 - Surveillance Methodology

1.9.8. On an annual basis, the SAAS Head Office SHALL send its proposed surveillance audit plans for the following year to SAAS Accredited CBs. The plan is based on the CB's performance from the previous 12 months, as well as its route for accreditation (Route 1 or Route 2).

1.9.9. Obligations of the Certification Bodies: Each accredited CB SHALL promptly notify SAAS of any intended or actual changes to its management system or any other changes that may materially affect its conformity to the accreditation criteria. This requirement encompasses, as an example, any such changes in a country within the scope of accreditation, plans to begin activity in new countries, an increase of 5-10 or more SA8000 audits in an existing country, or other such expansions that have taken place, as well as at its headquarters. Additional examples include changes to:

- a) Legal, commercial or organisational status;
- b) Organisation and management, for example key managerial staff and changes to the accreditation decision process;
- c) Policies and procedures related to SA8000;
- d) Personnel, equipment, facilities, location, working environment or other resources;
- e) The intended use of subcontractors;
- f) Acquisitions of or mergers with other CBs.

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1.10. INCREASED MONITORING OF CB ACTIVITY

1.10.1. The SAAS ARP, SAAS LA, or other SAAS personnel may recommend an increase in monitoring a CB's activity if there is reasonable concern about the CB's operations, under circumstances where suspension or withdrawal of accreditation may not be appropriate. However, increased monitoring does not have to precede suspension or withdrawal.

1.10.2. Increased monitoring may be considered for any of the following reasons:

- a) Significant organisational changes within the CB, including a change in the designated head office and/or management staff, addition of a new critical location, or expansion into a new country.
- b) Increased certification activity.
- c) Multiple non-conformities and/or complaints in a specific area (for example, but not limited to: audit day calculations or an industry-specific program requirement or in a specific country/region).
- d) Relationships that cause a real or perceived conflict of interest.
- e) CB SA8000 certification activities in highest and high-risk countries.
- f) Other conditions deemed appropriate.

1.10.3. Increased monitoring may include increased office audits and/or witnessed audit activity, depending on the reasons for increased frequency.

Note: As well as routine surveillance activities, SAAS may use additional methodologies for increased monitoring, such as: remote audits, market surveillance visits, and duplicate and unannounced audits. [See also ISO/IEC 17011:2004 Clause 7.11.2]

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1.11. REACCREDITATION

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- 1.11.1. All CBs SHALL have at least a total of three active [i.e. clients somewhere within a valid three-year certification cycle and subject to routine surveillance audits] SA8000-Certified Clients at the time of application for reaccreditation.
- a) If a CB fails to have a total of three active SA8000-certified clients at the time of application for reaccreditation, the CB may submit a request to SAAS for a 6-month extension in which to demonstrate its ability to achieve this minimum. This extension request shall be submitted prior to the application for reaccreditation.
 - b) The reaccreditation process shall move forward, if the CB wishes to be reaccredited, with all steps as outlined below.
 - c) Failure to achieve three active clients within the extended time period shall result in the CB reaccreditation not being granted and a withdrawal of the CB's accreditation. The CB may apply again for reaccreditation after a period of 12 months has lapsed. The degree of review necessary to reaccredit the CB is left to the discretion of SAAS and the SAAS ARP and will be based upon a risk assessment.
- 1.11.2. As part of the reaccreditation process, SAAS SHALL require the applicant CB to complete and submit an application for reaccreditation with supporting documentation, policies and procedures, which SHALL be reviewed as part of a reaccreditation document review conducted by SAAS. This documentation shall be submitted approximately six months prior to the expiration of accreditation.
- 1.11.3. SAAS SHALL conduct an office audit of the CB's complete SA8000 certification system at its head office approximately three to six months prior to the expiration of accreditation. All application material shall have been submitted prior to the office audit. Other office locations of the CB, in addition to the head office, may be subject to reaccreditation audits as part of the reaccreditation audit process, as determined by SAAS.
- 1.11.4. A number of witness audits prior to the expiration shall also be designated as part of the reaccreditation process.
- a) The number of witness audits required SHALL be based upon the number of CB clients in Highest and High Risk countries and other factors identified within this document for selecting witness audit locations and frequency.
 - b) The required witness audit by SAAS observing the CB conduct a Stage 2 SA8000 audit may be conducted any time during the accreditation cycle; however, it shall be completed prior to reaccreditation.
 - c) In all cases, SAAS SHALL conduct a witness audit within the six months prior to the expiration of accreditation. The reaccreditation witness audit SHALL:
 - i. Be of a certified organisation that has been certified for some time (a mature certified organisation);
 - ii. Consist of an audit of more than 1 day with more than 1 SA8000 auditor.
- 1.11.5. The SAAS reaccreditation audit team SHALL usually consist of the outgoing and incoming SAAS Client Managers.
- 1.11.6. Upon completion of the on-site audits and acceptance of corrective action plans to address NCs (as applicable), SAAS staff SHALL prepare the CB's reaccreditation package and submit it to the SAAS ARP for the reaccreditation recommendation. The package includes an Executive Summary, including summary of all audits from the current accreditation period; reaccreditation audit reports; a copy of the

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reaccreditation application form; a summary of the non-conformities identified in the audits, the CB's corrective action responses (including correction, root cause analysis, and corrective action), and the status of the non-conformities (for example: open, closed, or verified); as well as a summary of complaints and appeals. Reaccreditation shall not be considered if the CB has open major non-conformities.

1.11.7. If the SAAS ARP recommends in favor of reaccreditation, upon a final decision by the SAAS Executive Director, SAAS SHALL issue the CB a new accreditation agreement and certificate of accreditation. SAAS may impose certain conditions in its reaccreditation decision for the CB. The re-accredited CB SHALL have the duty to ensure that those conditions are met.

1.11.8. If SAAS decides against reaccreditation, SAAS SHALL notify the CB in writing of the decision, the reasons for it, and any next steps for the CB and SAAS to initiate suspension or withdrawal of accreditation. The CB may appeal the decision.

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1.12. EXPANSION OR REDUCTION OF GEOGRAPHICAL AREAS

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- 1.12.1. SAAS accreditation of CBs for the delivery of SA8000 certification is NOT given on a global basis, but rather on a regional and country-by-country basis. See Annex A - ISO17021-1:2015 - SAAS ACCREDITATION ADDITIONAL REQUIREMENTS for additional information on the scope of accreditation.
- 1.12.2. If a SAAS-accredited CB wishes to extend or reduce its accredited geographical scope of operation, it SHALL apply via email to saas@saasaccreditation.org, and copy the designated SAAS-CM. All CBs, including those that already have global accreditation from SAAS, as well as those with limited country by country or regional accreditation shall comply with the following process requirements:
- a) Should the CB wish to add additional offices to the scope identified in the accreditation certificate annex or change the location of, or activities performed by existing offices identified in the annex, it SHALL notify SAAS in writing using only the SAAS-approved reporting form. The CB shall be sent the appropriate forms to complete and return to SAAS.
 - b) Should the CB wish to undertake SA8000 audit activity in a country it has not previously done audits and add a new country to the scope identified in the accreditation certificate annex, it SHALL notify SAAS in writing using only the SAAS-approved reporting form. The CB shall be sent the appropriate forms to complete and return to SAAS.
 - c) Supporting documentation shall be submitted to accompany the request for expansion. CBs shall undertake a risk assessment to review the expansion of activity. This assessment, as well as evidence of research, stakeholder engagement, resource allocation and auditor and personnel competencies shall be reviewed by SAAS prior to undertaking a decision for expansion.
- 1.12.3. SAAS staff are authorized to make decisions on a geographical extension of scope based on the recommendation of the CB's SAAS-CM. SAAS staff shall inform the CB when its review is complete and a decision on the Scope Extension is reached.
- 1.12.4. SAAS staff are authorized to make decisions, based on the recommendation of the SAAS-CM, or as a result of accreditation audit activity by SAAS, regarding a reduction of geographical scope if there is evidence that the CB no longer possesses the necessary competence or resources to audit and issue certifications in that region/country. Such changes may also be based on request of the CB. These changes shall be reflected in the issuance of an updated accreditation certificate annex.

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1.13. COMPLAINTS

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1.13.1 Complaints Sent Directly to CB:

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1.13.1.1 Upon receipt of a complaint within the scope of SAAS accreditation, the CB SHALL, at minimum:

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a) Initiate its complaints procedure.

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b) Acknowledge receipt of the complaint to the complainant within 5 working days.

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c) Determine the acceptability of the complaint based on evidence received.

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1.13.1.2 If the complaint is accepted by the CB, the CB SHALL conduct an investigation as detailed below.

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1.13.1.3 If the complaint is not accepted, the CB SHALL notify the complainant of why it was not accepted, and provide instructions on the CBs appeals process. The complainant SHALL also be given the opportunity to provide additional evidence to support the complaint.

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1.13.1.4 Complaints SHALL be reviewed by designated CB staff to determine their relevance to provisions of SA8000 or SAAS audit requirements or accreditation procedures, and determine if the CB should record the information as documented evidence of an SA8000 client's non-compliance (if applicable).

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a) The CB SHALL conduct an investigation, which may be aided by an unannounced audit and through interviews with outside stakeholders, such as: trade unions, NGOs, and the complainant.

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b) The investigation SHALL cover all elements identified in the complaint.

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c) If the complaint relates to a specific audit, the CB SHALL assign personnel to the complaint investigation who were not a part of the relevant audit team.

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1.13.1.5 The CB SHALL submit a report to the complainant regarding the conclusion of its investigation.

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a) The report SHALL present the resolution of the complaint and the reasons for that conclusion.

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b) The report SHALL summarize the documented evidence submitted and the response, if there is any, from the certified organisation's management. If the certified organisation has agreed to corrective action, its commitment SHALL be included in the report. When the CB confirms that the certified organisation has implemented the corrective action, this information SHALL be included in the report as well.

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c) The certified organisation's management SHALL have the right to submit a written response to the allegations. This response, or a summary of it, SHALL be included in the report. The report SHALL be written according to any relevant confidentiality agreements, and SHALL be issued within 10 days of rendering the decision.

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1.13.2 Complaints Received by SAAS Regarding CBs and CB Clients:

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1.13.2.1 Any complaints received by SAAS regarding CBs and CB clients SHALL be forwarded to the relevant CB for further action and investigation. CBs SHALL follow the process as detailed above.

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1.13.2.2 In addition, the CB SHALL at a minimum:

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a) Acknowledge receipt of the complaint from SAAS.

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b) Report its plan of action to SAAS within 10 days, and submit subsequent reports every 30 days after that point.

c) Establish contact with the complainant as part of the investigation.

d) Complete the investigation within 90 days or less, unless otherwise agreed upon with the SAAS Executive Director.

1.13.2.3 SAAS may elect to investigate the CB's actions in investigating the complaint by conducting an additional audit of the CB and/or certified organisation.

1.13.3 Other Types of Complaints Received by SAAS:

1.13.3.1 SAAS may receive information regarding a CB or a CB's certified client from a stakeholder with whom SAAS or SAI, the owner of the SA8000 standard, has a relationship. This stakeholder may have information that raises issues of concern about the certified organisation, which then requires investigation by the CB. SAAS SHALL require CBs to treat such issues of concern as formal complaints and undertake an investigation as noted in the points above, and correspond directly with the stakeholder.

1.13.3.2 The relevant complainant may wish to remain anonymous. In such cases, SAAS SHALL act as the intermediary; the CB SHALL send all correspondence to SAAS, which shall liaise with the complainant.

1.13.4 All complaints SHALL be logged and actioned, with records maintained. The CB SHALL provide the SAAS auditor with this information during accreditation audits. All CBs in the SAAS accreditation system SHALL keep records of complaints, appeals and responses for a minimum of 10 years after the resolution of the complaint. Non-confidential information about complaints is published on the SAAS website: <http://www.saasaccreditation.org/complaints>.

1.13.5 Each CB SHALL provide a detailed report to SAAS of all complaints received every 6 months. This report SHALL include details of the complaint, outcome, root cause analysis and corrective action, as necessary.

1.13.6 The CB complaints process SHALL include statutes covering whistleblowers which protects such whistleblowers from retaliation. This SHALL include protection for personnel within the certified organisation as well as other stakeholders within the SA8000 process.

1.13.7 SAAS has developed a confidential complaints system for stakeholders to use. This can be found at: <http://www.saasaccreditation.org/complaints>.

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1.14. NON-CONFORMITIES RAISED ON CBs

- 1.14.1. During any SAAS audit, the SAAS LA may raise a non-conformity on the CB as a result of a non-compliance with the SAAS accreditation criteria. The CB SHALL be given the opportunity to make the correction, determine the cause of the issue, and take corrective action within a period determined by SAAS, without prejudice to SAAS's right to immediate termination of the Accreditation Agreement. Opportunities for Improvement (OFI) may also be raised during the audit.
- 1.14.2. NCs may also be raised as a result of issues brought to the attention of SAAS staff, independent of a document review, witness or office audit. These types of NCs usually involve issues such as an incorrectly issued certificate or failure to pay a SAAS invoice within the allotted number of calendar days. In such cases, the CBs SAAS Client Manager may raise the NC.
- 1.14.3. During witnessed CB audits, the SAAS LA is witnessing a CB audit team as an observer and SHALL not actively pursue an independent audit trail. Thus, a non-conformity cannot be submitted prior to discussion with the CB audit team during the closing meeting between SAAS and the CB's audit team. The CB audit team may have a reasonable explanation for its decision regarding a conformity or non-conformity for a given area during the audit.
- 1.14.4. All non-conformities identified SHALL be documented by SAAS and entered into a database by SAAS staff.
- 1.14.5. Each non-conformity issued by SAAS SHALL have three documented parts: (1) the requirement, (2) the statement of finding, and (3) the evidence.
- 1.14.6. SAAS SHALL classify all non-conformities as "Critical," "Major" or "Minor." Critical NCs are generally only raised as a result of a CB Head Office audit, or independently between audits by the CB's SAAS Client Manager/SAAS Head Office staff. A Critical NC SHALL initiate the SAAS accreditation suspension process.
- 1.14.7. The SAAS LA SHALL leave copies of NCs with the relevant CB representative present during the on-site audit. The CB representative SHALL sign each CAR to acknowledge that it was presented to him or her. There may be times when the SAAS accreditation auditor SHALL require consultation with the SAAS Head Office staff prior to issuing a CAR. In these limited circumstances, a CAR may be issued subsequent to the conclusion of the on-site office or witness audit.
- 1.14.8. All NCs raised by SAAS Auditors SHALL be sent to the SAAS-PC and the CB's SAAS-CM within five working days of the audit. The SAAS-PC or SAAS-CM SHALL send a copy of the CARs to the CB's nominated program manager within 14 days from the final date of the audit. However, it SHALL be expected that the CB's program manager SHALL have received a copy of the CARs directly from the CB representative present during the audit.
- 1.14.9. All responses to CARs shall be reviewed by the SAAS LA and the SAAS-CM concerned. As a result of this review, the corrective actions may be accepted or, in some limited circumstances, the CARs themselves may be upgraded, downgraded or withdrawn.
- 1.14.10. SAAS is committed to ensuring that accreditation audit reports are sent to the CB as soon as possible after the audit. If there are unexpected delays, the SAAS-PC shall advise the CB via email of such. The SAAS reporting process, in general, follows the system as described in Figure 6 .

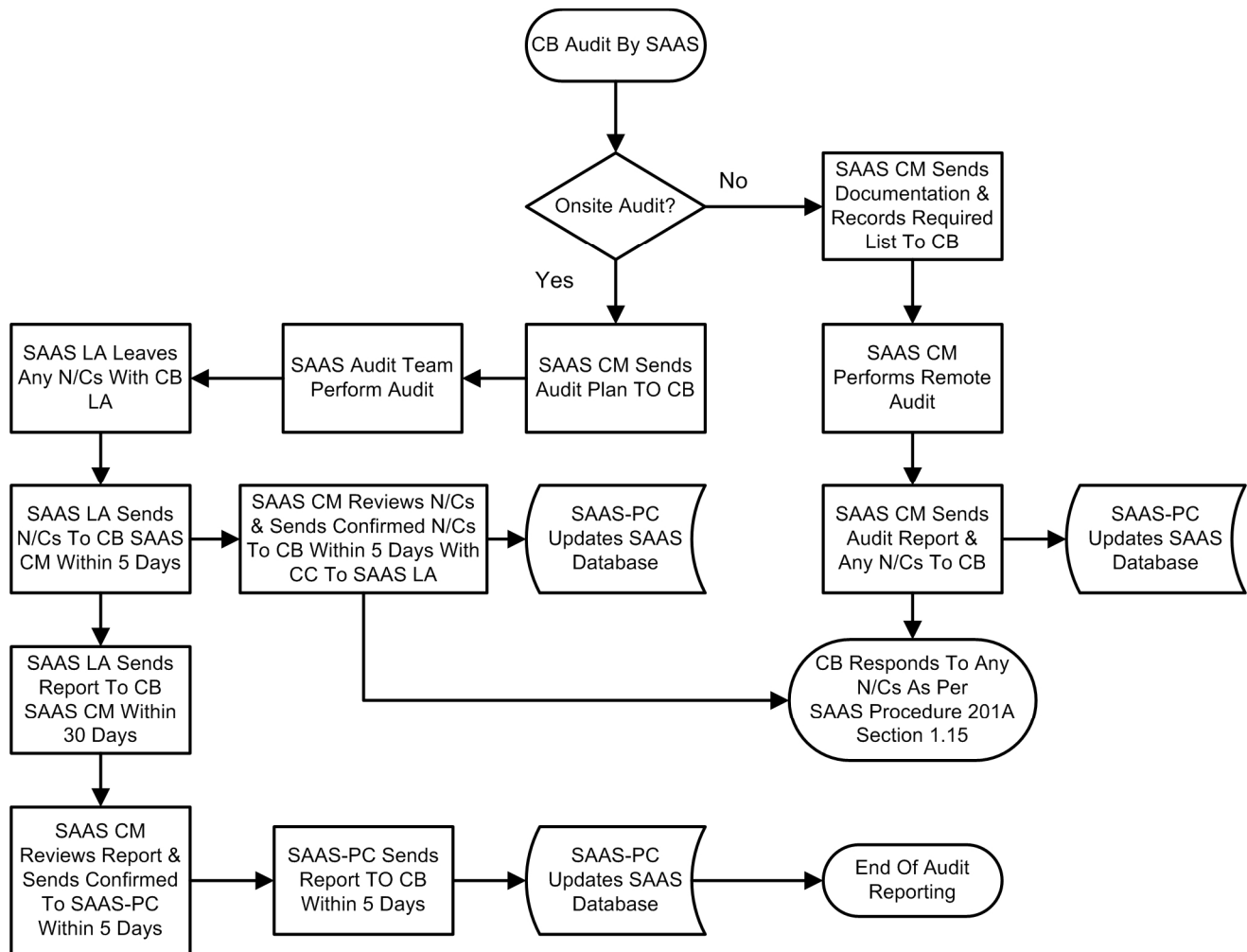


Figure 6 - SAAS Reporting Process

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1.15. PREVENTIVE & CORRECTIVE ACTION

- 1.15.1. The CB SHALL be required to respond in writing to all CARs raised by SAAS, detailing its proposed corrective action plan within the timeframes described in Figure 7. Failure to do so shall result in escalation to a Critical NC or suspension, as necessary.
- 1.15.2. The CB SHALL respond to all non-conformities raised by SAAS and forward its response to the SAAS-PC within the following timeframes, as described in Figure 7.

CAR Type	SAAS to Submit Copy of CARs to CB Within	CB to Submit Root Cause Analysis and CAP to SAAS Within	Preventive Action and Corrective Action Undertaken Within	Evidence of Effective Preventive and Corrective Action Available Within	Escalation if Timescales Not Met
Critical	14 Days From Final Date of Audit	21 Days From Final Date of Audit	45 Days (1.5 months) from Final Date of Audit	60 Days (2 months) from Final Date of Audit	Suspension of CB
Major	14 Days	30 Days (1 month)	60 Days (2 months)	90 Days (3 months)	Critical N/C Raised
Minor	14 Days	30 Days (1 month)	90 Days (3 months)	180 Days (6 months)	Major N/C Raised

Figure 7 – CB NC Response Times

Note: The timelines in Figure 7 do not include additional time for communication between SAAS and the CB if responses are not accepted. It is recommended that the CB provide responses early to allow time for additional reviews if needed. These timelines also do not apply while a non-conformity is under appeal.

- 1.15.3. The CB Corrective Action Plan (CAP) SHALL consist of four parts, as described in Figure 8. The CAP SHALL be submitted using SAAS Form 415B. [See also ANAB Heads Up Issue: 137 - Re: Improved Corrective Action Responses (<http://anab.org/media/1899/hu137.pdf>)]

Part 1	Root Cause Analysis	It is necessary to determine the root cause to take corrective action. The CB should use an appropriate process, such as Fishbone (Ishikawa) Diagram, Pareto Analysis, 5 Why's, to determine cause.
Part 2	Correction/Containment	Action to eliminate a detected non-conformity.
Part 3	Corrective Action	Action to eliminate the cause of a detected non-conformity.
Part 4	Preventive Action	Action to eliminate the cause of similar potential non-conformities.

Figure 8 - CB CAP Elements

- 1.15.4. The process for review and acceptance of corrective action plan SHALL include a review by the SAAS-CM of the CB's response, who SHALL then send his or her review to the SAAS-PC. Corrective action SHALL address the systematic weaknesses that permitted the violation to occur, so actions that simply state "train the auditor" shall likely be rejected.
- 1.15.5. SAAS-CMs are authorized to assess whether the CB has taken adequate correction, preventive and corrective action and if the actions have been effectively implemented, with supporting evidence showing effective implementation. NCs and their corrective actions SHALL be reviewed during the annual Head Office Audit.
- 1.15.6. If applicable, the SAAS-CM SHALL explain his or her justifications for rejecting the CB's response or for

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accepting the response and closing the non-conformity.

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- 1.15.7. If a response is not accepted, the CB SHALL send additional responses and supporting documentation to SAAS.
 - 1.15.8. The corrective action process SHALL be repeated as necessary until the response is accepted and the non-conformity is closed. Non-conformities SHALL only be closed when evidence of effective implementation has been presented by the CB.
 - 1.15.9. For applicant CBs, initial accreditation SHALL not be granted until all identified critical and major non-conformities are closed.
 - 1.15.10. For reaccreditation, CBs SHALL close every Critical and Major non-conformity prior to the expiration date of accreditation. If the CB fails to close any non-conformity prior to the date of expiration, it may receive a recommendation for a shorter-term accreditation (requiring additional accreditation audits and an additional application for reaccreditation), suspension, or withdrawal, with justification to support the recommendation. Reaccreditation SHALL not be granted until all identified critical and major non-conformities are closed.
 - 1.15.11. During all SAAS office and witness audits, auditors SHALL verify the continued, effective implementation of corrective and preventive actions for non-conformities previously addressed.
 - 1.15.12. The CB SHALL ensure that all NCs that SAAS raise, and their subsequent corrective actions, are discussed in detail during the CB's next Auditor Training session. Records SHALL be maintained to demonstrate evidence of such.

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1.16. PUBLIC NOTICE AND INFORMATION

- 1.16.1. SAAS publicly announces the accreditations that are granted, expanded, reduced, renewed, suspended, and withdrawn.
- 1.16.2. SAAS maintains a publicly available directory of SAAS-accredited CBs and information regarding scope, suspensions and withdrawals of accreditation on its website:
<http://www.saasaccreditation.org/accredcertbodies>

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1.17. FEES

1.17.1. Accredited and applicant CBs SHALL pay the relevant fees, as shown in the table below. The fee schedule is available for download at <http://www.saasaccreditation.org/fees> SAAS Procedure 406. Figure 9 illustrates the actions that SAAS SHALL take if invoices are paid late.

1.17.2. A CB may appeal an invoice and SHALL follow the Appeal Process as detailed below. If the decision is in favor of the appellant, a credit or refund shall be issued.

Notes

- (A) A CB on financial probation may not:
- Apply for extension of the scope of accreditation.
 - Receive an SAAS-issued certificate for initial accreditation, annual renewal, or re-accreditation.
 - Apply for accreditation to additional standards.
 - In addition, SAAS may suspend any such activity that may be under way on behalf of the CB.
- While on financial probation, a CB can still issue SAAS-accredited certificates.

- (B) SAAS staff are authorized by the SAAS ARP to suspend a CB's accreditation if an invoice remains unpaid 50 calendar days after the invoice due date. SAAS will send the CB written notice of the suspension decision.

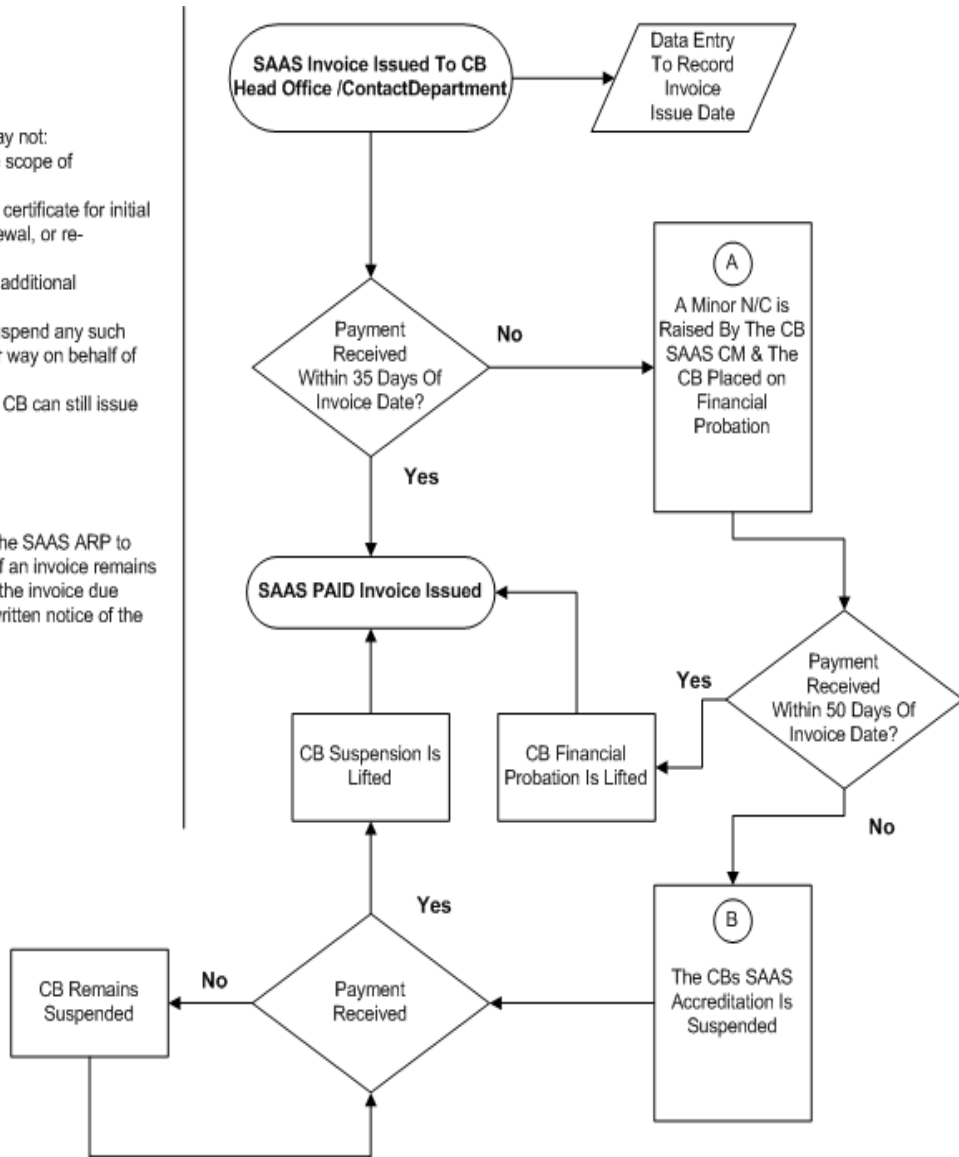


Figure 9 - Invoice Late Payments

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1.18. SUSPENSION OR WITHDRAWAL OF ACCREDITATION

- 1.18.1. Suspension or withdrawal of accreditation is initiated by formal action of SAAS, who shall notify the SAAS ARP.
- 1.18.2. The period of suspension SHALL not exceed six months, unless specifically recommended by the SAAS ARP. Failure to satisfy the conditions or to remedy the causes of suspension within the specified time period is grounds for initiating withdrawal of accreditation.
- 1.18.3. Suspension of a CB's accreditation places complete or limited restrictions on the CB's ability to continue to offer and provide accredited SA8000 certification. Suspension can apply to the CB's full geographical scope of accreditation or for specific geographical locations.
- During the suspension period, the CB SHALL not continue to conduct audits for initial certification or recertification and SHALL not issue any new or revised certifications within the scope of the suspension. While it is suspended, usually a CB may continue to conduct required surveillance audits and other services necessary to maintain accredited certifications. This shall be clarified in the letter of suspension sent by SAAS to the CB.
 - The CB SHALL, within 10 calendar days of the notification of suspension, provide SAAS with an updated list of names, mailing addresses, telephone numbers, and e-mail addresses (as applicable) of every client with an accredited certification within the scope of the suspension.
 - While it is suspended, the CB may be required to pay in advance for any audits or other services that SAAS performs to maintain its accreditation.
 - If a CB is suspended within 6 months of their reaccreditation expiry date, the CB's reaccreditation head office audit SHALL take place within 6 weeks of the date of the suspension letter from SAAS.
- 1.18.4. Any of the following reasons are considered grounds for suspension and/or withdrawal of SAAS accreditation:
- CB's failure to conform to accreditation requirements.
 - CB's inability or unwillingness to ensure conformity of its certified organisations to applicable standards.
 - Ineffective correction and/or corrective action taken, or corrective action not implemented within a specified time period.
 - Non-conformity with, or failure to execute the SAAS Accreditation Agreement.
 - Improper use of the certificate of accreditation or the SAAS accreditation mark
 - Existence of a complaint or a number of complaints, indicating that the management system of the CB is not being maintained.
 - Failure to meet financial obligations to SAAS.
 - Failure to maintain an effective audit management program in accordance with the current issue of ISO/IEC 17021 and SAAS Procedures 200 & 201.
 - Falsification of any nature.
- 1.18.5. The decision to suspend shall be made by the SAAS Executive Director and reported to the ARP, with appropriate supporting documentation.
- 1.18.6. Prior to suspension of an accreditation certificate, the SAAS Executive Director shall inform the CB in writing that there has been a breach of the conditions of accreditation and that corrective action must be taken to prevent suspension of the CB's accreditation. A period of time for correction shall be designated by the Executive Director; SAAS will provide an estimate of the cost of any additional audit days to confirm the corrective action, should additional audit days be required.
- 1.18.7. Within five calendar days of the decision, SAAS staff SHALL notify the CB of its suspension or withdrawal,

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434 in writing. The notice SHALL inform the CB of the effective date of suspension or withdrawal and
435 SHALL include a clear statement of the reason(s) for the suspension or withdrawal. SAAS SHALL
436 make public the notice of suspension or withdrawal on its SAAS website at
437 <http://www.saasaccreditation.org/accredcertbodies>.
438

439 1.18.8. Upon receipt of the notice of withdrawal of accreditation (as applicable), the CB SHALL:
440

- 441 a) Provide to SAAS a list of and contact information for all clients affected, within five calendar days.
- 442
- 443 b) Provide to SAAS the notice the CB intends to send to its certified and applicant clients of (1)
444 withdrawal or cancellation of SAAS accreditation, (2) the requirement for the client to return the
445 SAAS accredited certificate (as applicable), and (3) the process to transfer to another SAAS
446 accredited CB. This SHALL be provided within five calendar days for SAAS's review and approval.
447
- 448 c) Send the approved notification to its certified and applicant clients within 15 calendar days.
- 449
- 450 d) Make every reasonable effort to withdraw any SAAS-accredited certificate within 90 calendar
451 days.
452

453 1.18.9. SAAS may contact the CB's certified and applicant clients directly in the event the CB fails to fulfil its
454 obligations.
455

456 1.18.10. A record of suspensions and withdrawals of accreditation SHALL be maintained on the SAAS website
457 at <http://www.saasaccreditation.org/accredcertbodies>. The name and location of each CB that has
458 been suspended, or has had accreditation withdrawn SHALL be posted, with the effective date(s) and
459 any explanation(s), as applicable.
460

461 1.18.11. If applicable, following withdrawal of accreditation, accreditation may be re-granted only after the CB
462 has successfully completed both the application process and the initial accreditation process again,
463 including payment of all required fees.
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1.19. APPEAL PROCESS

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1.19.1. A CB may appeal (dispute) any decision or action taken by SAAS including the issuing of CARs.

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1.19.2 A CB may appeal a SAAS invoice; however, the invoice SHALL be paid in full prior to the due date to avoid financial probation and/or suspension. The appeal of an invoice SHALL follow the appeal process as outlined the SAAS Schedule of Fees, Procedure 406. If the decision is in favor of the appellant, a credit or refund shall be issued.

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1.19.3. The SAAS appeal process has two levels: Level 1 appeals are heard by SAAS personnel and Level 2 appeals are heard by the SAAS Board of Directors.

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a) Level 1 appeals are heard by staff members and/or accreditation auditors not involved in the audit. This is normally the level applied to any appeal, dispute or challenge of a SAAS-raised audit non-conformity or other outcome of an accreditation audit. However, an appeal of any critical or major non-conformity from an initial or reaccreditation audit, may be heard by an appeals panel of SAAS Board of Directors members. The ARP SHALL be notified in the case of an accreditation certificate suspension or withdrawal as a result of the appeals process.

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b) Level 2 appeals are made to the SAAS Board of Directors and are heard by a panel of members of the SAAS Board with no single interest predominating. This is the first level for any appeal of an accreditation decision. It is also the second level of appeal if either party (the appellant or SAAS) is not satisfied with the decision made by the Level 1 appeal panel.

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1.19.4. An appeal SHALL be lodged in writing no later than 30 days after notification to the CB of the decision or action, or whenever the appropriate appeal panel may reasonably assume that the appellant was informed of the decision or measure in question.

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1.19.5. Appeals SHALL be lodged with the SAAS-PC and SHALL include appropriate substantiation for the appellant's position.

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1.19.6. The appeal SHALL be heard within 60 days, unless otherwise agreed by all parties.

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1.19.7. The results of the panel's decision SHALL be documented and communicated to the appellant.

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1.20. CONFIDENTIALITY AND DISCLOSURE OF INFORMATION

- 1.20.1. Contact information submitted by the CB with its application is considered public information and is publicly available on the SAAS website (www.saasaccreditation.org).
- 1.20.2. SAAS SHALL make information publicly accessible about accreditations that have been granted, extended, reduced, suspended or withdrawn.
- 1.20.3. SAAS SHALL maintain a publicly accessible list of accredited SA8000 certificates.
- a) Information included in this list SHALL allow stakeholders to confirm the validity of an SA8000 certificate and SHALL include: name of the certified organisation, address, scope of certificate, date of initial and subsequent certifications, the name of the CB that issued the certificate, and the certificate number. All certified organisations and sites within the scope of the certificates SHALL be listed.
 - b) This list SHALL be provided by the accredited CBs to SAAS and regularly updated so as to provide accurate information.
 - c) CBs SHALL ensure such information is accurate and made available to SAAS and included in contracts with its clients.
- 1.20.4 All other information SAAS acquires in relation to SAAS accredited activities, except for accreditation information that is required to be publicized and is made publicly available by the CB, is treated as confidential by all SAAS staff, auditors, SAAS ARP, committees, and any contractors or subcontractors.
- a) Such information SHALL not be disclosed to any unauthorized party without the written consent of the CB, except if required by law. When SAAS is required by law to release such information, the CB SHALL be informed of such.
 - b) SAI, as the owner of the SA8000 Standard and system, SHALL have access, upon request to SAAS, to the following information:
 - i. SA8000 audit reports
 - ii. SA8000 accreditation audit reports
 - iii. Outcomes and evaluations related to the Social Fingerprint self-assessment and independent evaluations.
 - iv. CB's SHALL ensure this is written into its contracts with clients.
- 1.20.5 The certification contract that the CB has with its SA8000 client [See ISO/IEC 17021-1:2015 Clause 5.1.2 Certification agreement] SHALL include the following as a minimum but not limited to:
- a) All audit process requirements found in SAAS Procedure 200.
 - b) Access to the organisation by SAAS for the purposes of witness audits and other special audits as needed.
 - c) Ability to share confidential audit outcomes with SAAS and SAI as part of the oversight system.
 - d) Access to all parts of the organisation during working hours [including night shift] on an announced and unannounced basis.
 - e) Permission to take copies of documents.
 - f) Permission to take photographs of non-proprietary processes and at locations around the site.
 - g) Providing copies of previous CB SA8000 reports if organisation transfers to a new CB. See SAAS Procedure 200 related to Transfer Processes.

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1.21. APPROVAL AND REVISION OF ACCREDITATION REQUIREMENTS

- 1.21.1. Following release of any updated procedures, including SAAS Procedure 201A, and/or other Accreditation Rules or revisions thereof, these documents SHALL be posted on SAAS's website:
<http://www.saasaccreditation.org/document-library>.
- 1.21.2. When the Procedure 201A and/or other Accreditation Rules are revised, SAAS SHALL immediately notify accredited and applicant CBs. SAAS SHALL specify a schedule for monitoring CB actions to achieve conformity to the revised accreditation requirements. The date by which the changes are to be implemented and process for confirming compliance SHALL be specified. In most cases, additional office audit time or a document review SHALL be added to the audit process to confirm compliance with the new requirements.
- 1.21.3. When external documents (such as SA8000, ISO/IEC standards or guides) relating to SA8000 certification and/or accreditation requirements are published or revised, SAAS SHALL notify accredited and applicant CBs. SAAS SHALL specify a schedule for monitoring CB actions to achieve conformity to such new and/or revised accreditation requirements. The date by which the changes are to be implemented SHALL be specified. In most cases, additional office audit time or a document review SHALL be added to the audit process to confirm compliance with the new requirements.

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1.22 INTERNAL AUDITS, ON-SITE SAMPLING & WITNESSED AUDITS

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- 1.22.1. Each CB SHALL conduct internal audits at planned intervals at all locations that deliver SA8000 certification services. The audit shall be conducted using full-time qualified staff and not subcontractors.
- 1.22.2. Each CB SHALL conduct internal audits at planned intervals at ALL office locations that deliver SA8000 certification including the offices of subcontractors.
- 1.22.3. Internal audits can be all on-site or a mixture of remote and on-site audits, as determined by the risk assessments of the CB.
- 1.22.4. In “High Risk” and “Highest Risk” countries, as identified by the SAAS country risk assessment, ALL internal audits SHALL be performed on-site.
- 1.22.5. ALL internal audits of the CB’s SA8000 Certification Management System SHALL be performed by senior auditors of the CB. These auditors SHALL be formally nominated, in writing, by senior executive management of the CB for this purpose. The senior auditors need not necessarily be SA8000 Auditors but, through their training, knowledge and experience, be able to demonstrate in-depth understanding of the SA8000 Certification Process including ISO17021-1:2015, Procedure 200, Procedure 201A and Procedure 201B.
- 1.22.6. In addition to performing internal audits, the CB SHALL complement its monitoring program by performing on-site witness audits at planned intervals of ALL auditors as identified in Procedure 201B. These audits SHALL be performed by SA8000 Senior Lead Auditors.

Annexures

ANNEX A - ISO17021-1:2015 - SAAS ACCREDITATION ADDITIONAL REQUIREMENTS

ISO 17021-1:2015 – SAAS ACCREDITATION ADDITIONAL REQUIREMENTS

The following describes the SAAS accreditation requirements that supplement those found in ISO17021-1:2015 and SHALL be implemented by accredited CBs and applicants seeking accreditation by SAAS for the SA8000 system.

1 Scope

Additional:

1.1 In general, SAAS Accreditation is granted on a country-by-country basis. A CB shall demonstrate to SAAS that it is competent to operate in a particular country. Applicants for initial accreditation may apply for scope as follows, based on the SAAS country risk assessment:

- a) Lower Risk Countries: accreditation may be granted to conduct SA8000 audits and issue certificates in all countries within this category.
- b) High Risk and Highest Risk Countries: accreditation may be granted to conduct SA8000 audits and issue certificates on an individual country by country basis.

2 Normative References

Additional:

- a) SA8000:2014
- b) SA8000:2014 Guidance Document
- c) SAAS Procedure 200:2015
- d) SAAS Procedure 201A:2015
- e) SAAS Procedure 201B:2015

3 Terms and Definitions – no additions

4 Principles –

4.8.1 - All CBs SHALL adopt a risk based approach to delivering SA8000 certification.

Additional:

4.9 – In common with the organisations that they audit, each accredited CB is encouraged to support the concepts of a social accountability system and to comply with the requirements of SA8000:2014 in the operation of its business.

5 General requirements

5.2 Management of impartiality

Additional:

5.2.7.1 – In order to avoid conflict of interest, CBs whose related bodies have provided SA8000 or similar human resources management system consulting services within the prior three years to a particular organisation SHALL not contract as a certification body for that organisation or any of its sites. This restriction includes related bodies of the same parent company or affiliates, where the validity or reliability of an audit can be questioned because of a consulting relationship.

Note: Consulting is the provision of documentation development or assistance with implementation of management systems to a specific organisation. Training in a public forum is not considered consulting nor is an introductory session such as a 1-day awareness program at the Client's location. Arranging training and participating as a trainer is not 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. [See also ISO/IEC 17021-1:2015 5.2 Management of impartiality Clause 5.2.7 & 5.2.8].

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662
663 5.2.11.1 – All CBs SHALL have a documented procedure that addresses anti-bribery and corruption in countries where
664 the CBs are accredited to deliver SA8000 Certification.

- 665 a) This documented procedure SHALL describe how it attempts to detect bribery and corruption between the CB,
666 staff, auditors, technical experts and committees, and its clients.
- 667
- 668 b) The detection process SHALL be based upon a documented risk assessment performed for each country where it
669 performs SA8000 Certification activities. At a minimum, the CB SHALL:
- 670 1. Have a developed principle based zero tolerance anti-corruption and anti-bribery policy. The policy
671 SHALL include statutes covering whistleblowers, protecting such whistleblowers from retaliation.
- 672
- 673 2. Have a policy that includes specific steps to report, investigate and address situations of attempted
674 bribery.
- 675
- 676 3. Have a reporting system with contact information for stakeholders to use.
- 677
- 678 4. Require auditor and employee acknowledgement and ongoing and continuing training on the subject,
679 policy, process and required actions.
- 680

681 5.2.14 – The CB SHALL have a documented procedure that describes its annual risk analysis of issues that might affect
682 its impartiality for every country in which it performs SA8000 certification. This analysis SHALL be presented at an annual
683 meeting of the Committee for Safeguarding Impartiality for debate and agreement.

684

685 5.2.15 – The impartiality committee SHALL contain individuals with demonstrable experience related to social
686 accountability issues in the regions where the CB delivers SA8000 certification.

687

688 5.3 Liability and financing

689 **Additional:**

690 5.3.3 – The CB SHALL present evidence of the appropriate level of professional indemnity and third party liability
691 insurance to the SAAS auditor at each head office audit. The CB SHALL also inform the SAAS auditor about its coverage
692 of individual contract auditors and subcontractors: either the contract auditors and subcontractors are covered by the CB's
693 insurance or they have to carry their own insurance. If contract auditors and subcontractors are required to carry their own
694 insurance, the CB SHALL demonstrate how it ensures that the insurance is kept up-to-date.

695

696 6 Structural requirements

697 6.1 Organisational structure and top management

698 **Additional:**

699 6.1.5 – The CB SHALL have a documented procedure that describes how it disseminates changes in SAAS requirements
700 to its regional offices, contract auditors and subcontracted offices. This procedure shall also describe how it overcomes
701 language communication barriers.

702

703 6.2 Operational Control

704 **Additional:**

705 6.2.3 – The CB SHALL perform annual individual risk assessments for each country where it delivers SA8000
706 Certification.

707

708 6.2.4 – The CB SHALL not offer SA8000 certification in countries that meet the following criteria:

709

- 710 a) When applicable, as defined at <http://www.saasaccreditation.org/accreditation-requirements> and
- 711
- 712 b) Any country to which the CB Senior Auditors [as defined in 1.22.5 above] are not prepared to travel. The CB
713 SHALL maintain a list of such countries.
- 714
- 715 c) Any country to which SAAS accreditation auditors are not prepared to travel. Any such circumstances will be
716 listed at <http://www.saasaccreditation.org/accreditation-requirements>
- 717
- 718

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7 Resource requirements - In addition to requirements below, SAAS Procedure 201B addresses process requirements identified under this this clause.

7.1 Competence of personnel

Additional:

7.1.1.1 Using its own internal processes and records (and with reference to the requirements of SAAS Procedure 201B, where applicable), the CB SHALL demonstrate that all personnel whose work may impact the SA8000 Certification Program are competent. This includes:

- a) Advisory Committee Members
- b) Impartiality Committee Members
- c) Management Staff
- d) Audit Staff
- e) Subject Matter/Technical Specialists
- f) Administrative Staff
- g) Outsourced partner organisations and individuals

7.2 Personnel involved in the certification activities

Additional:

7.2.2.1 Only appropriately qualified and competent individuals SHALL participate in SA8000 audits (as described in SAAS Procedure 201B).

7.2.8.1 Those making the certification decision, as defined in SAAS Procedure 201B, SHALL be able to demonstrate how they come to the certification decision if there are language communication barriers between the decision-maker and the language the audit report and audit path notes are written.

7.2.11.1 The CB SHALL observe each of its auditors performing an SA8000 audit on-site at least once every 24 months. Witnessed audits by SAAS shall not satisfy this requirement. Such observations SHALL be conducted by Senior Lead Auditors, as identified in SAAS Procedure 201B.

7.3 Use of individual external auditors and external technical experts

Additional:

7.3.1 Contracts with individual auditors and external technical experts SHALL be reviewed and renewed annually. Such contracts SHALL include the following information:

- a) Whether the auditor shall work on an exclusive basis for the CB.
- b) Whether the auditor is required to carry their own insurance.
- c) That the auditor shall not use their own business cards or other personal documents during an SA8000 audit but only that of the accredited CB.
- d) That the auditor SHALL NOT offer any other services to any CB Client that he or she has audited within a 3-year period of the last audit to that CB Client.
- e) That the auditor SHALL attend experience exchange training at least once a year. Failure to attend two sequential training sessions SHALL result in the cancellation of the contract.
- f) That the auditor shall maintain CPE/CPD records as required by SAAS – see Procedure 201B.
- g) That the auditor shall maintain an audit log for the work they do for the CB.

7.4 Personnel records

Additional:

7.4.1 All personnel training and audit records for any country in which the CB operates SHALL be available to the SAAS Auditor at the time of the CB Annual Head Office Audit.

7.5 Outsourcing

Additional:

7.5.1.1 All outsourced activities SHALL require a legally enforceable service agreement between the accredited Certification Body and the subcontracted organisation outlining the roles and responsibilities of each party.

- a) The accredited CB SHALL assess any threats to impartiality that may arise as the result of a subcontracting relationship and make such records available for review by SAAS.

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- 777 b) Contracts with partner (subcontracted) organisations SHALL be subject to an annual review and SHALL
778 include relevant KPIs against which the performance of the partner can be monitored (e.g. quality of reports,
779 tardiness of reporting). These KPIs SHALL be reviewed by the CB at the time of management review.
780

781 7.5.1.2 The CB SHALL not outsource audits to a management system consultancy or training organisation, as this poses
782 an unacceptable threat to the impartiality of the CB.
783

784 7.5.1.3 CBs SHALL not outsource their SA8000 audit activity in highest risk countries.
785

786 7.5.1.4 CBs SHALL not use or outsource services of a subcontracted body that was formerly accredited by SAAS and
787 whose accreditation was reduced or withdrawn by SAAS and/or was unable to achieve accreditation through the SAAS
788 accreditation application process.
789

790 7.5.1.5 CBs SHALL not permit a subcontract organisation to further subcontract the required services to any organisation
791 or individual. This requirement SHALL be clearly stated in the contract between the CB and the subcontractor.
792

793 7.5.1.6 All SA8000 auditors who perform SA8000 audits SHALL present themselves as representatives of the SAAS-
794 accredited CB that has the authority to issue the SA8000 certificate.
795

- 796 a) Individual contract auditors and/or subcontracted auditing company representatives that perform SA8000
797 audits or audit related activities SHALL present themselves only as a representative of the SAAS accredited
798 CB.
799
- 800 b) All forms of identification, such as business cards or marketing materials, SHALL only reference the SAAS-
801 accredited CB.
802
- 803 c) Any additional contact information provided to the SA8000 client, worker representatives or employees
804 SHALL include the full contact details of the local representative (whether directly employed by a CB or
805 working through a subcontract agreement) and the SAAS-accredited CB's head office. That contact
806 information SHALL include:
807 • The accredited CB's name and logo
808 • Contact information of the SAAS-accredited head office
809 • Name and contact information of the local representative
810

811 7.5.1.7 All CB auditors SHALL only utilize audit reports, stationery, and any other documentation that contains the
812 SAAS-accredited CBs name and logo. No other audit reports, stationery or any other documents of the individual
813 subcontractor or subcontracted organisation SHALL be used.
814

815 7.5.1.8 The certification body SHALL issue the SA8000 certificate to the client directly with its logo as well as the SAAS
816 mark.
817

- 818 a) Only a SAAS-accredited CB's logo may appear on an SA8000 certificate.
819
- 820 b) In the interest of transparency, when used, subcontractors' details SHALL appear on the SA8000 certificate,
821 displaying the name of the subcontracted organisation which carried out the audit.
822
- 823 c) An individual contractor or the subcontracted organisation's logo is prohibited from being displayed on any
824 SA8000 certificate.
825

826 7.5.1.9 All SAAS-accredited CBs SHALL ensure that their auditors, including subcontractors, have controlled copies of
827 all of the policies and procedures that are required to perform SA8000 audits and are sufficiently trained and competent in
828 such policies and procedures.
829

830 7.5.3.1 The certification body may contract the SA8000 audit to individual auditors and may use the resources of partner
831 (subcontracted) organisations to provide SA8000 auditing services (under a contractual agreement) within the parameters
832 defined in this document.

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- 833 a) All such contracted auditors and subcontracted auditing services SHALL conform to the CBs rules and
834 regulations.
835
- 836 b) The SAAS-accredited CB itself SHALL be responsible for all phases of the certification process, including
837 contractual arrangements, quotes, planning, auditing and review and approval of the audit report.
838

839 7.5.4.1 The SAAS Accredited CB SHALL perform internal audits of any subcontracted organisation at least once per
840 year, utilizing the CBs full-time staff. Internal audits performed by the partner organisation itself are not acceptable to fulfill
841 the accredited CBs requirements but SHALL be utilized as an input to the accredited CBs internal audit.
842

843 7.5.4.2 Representatives of any partner organisation SHALL participate in the management review of the SAAS-
844 accredited CB.
845

846 7.5.4.3 Every 12 months, each partner organisation SHALL be required to perform a risk and impartiality assessment of
847 its business to assess the integrity of the SA8000 audit services it offers on behalf of the accredited CB. Results of the
848 audit SHALL be forwarded to the CBs Impartiality Committee for review.
849

850 7.5.4.4 The accredited CB SHALL perform:

- 851 a) One duplicate audit on-site every two years of any subcontractor/partner organisation operating in high risk
852 countries.
853 b) One duplicate audit on-site every three years of any subcontractor/partner organisation operating in lower risk
854 countries.
855 c) The results of these audits SHALL be made available to the SAAS Auditor at the time of the annual Head Office
856 Audit.
857

858 8 Information requirements - no additions

859 9 Process Requirements - In addition to requirements below, SAAS Procedure 200 addresses process
860 requirements identified under this this clause.
861

862 9.1.2 Application Review

863 **Additional:**

864 9.1.2.4 CB's SA8000 auditors SHALL rotate between clients so that no SA8000 auditor performs more than 5 audits per
865 certification cycle per client.
866

867 9.1.2.5 While any competent individual may perform preliminary planning work, the CB's decision to accept an application
868 SHALL be assigned to an SA8000 LA (or higher-level individual), who is directly employed by the CB. Prior to
869 making such a decision, the assigned individual SHALL review and authorize outputs from the application review
870 process in the form of outline audit plan arrangements, indicating the following:
871

- 872
- 873 a) The audit team to be appointed (composed of auditors and technical experts [including any subcontracted
874 personnel], who, between them, have the totality of the competences and abilities required to perform the
875 certification activities). See also SAAS Procedure 201B.
876
- 877 b) The audit-days to be assigned for all activities associated with Stage 1 and Stage 2 SA8000 audits, including
878 justification for multi-site sampling and/or deviations from audit day requirements tables (where applicable).
879
- 880 c) The individual(s) who will be making the certification decision.
881
- 882 d) The CB SHALL maintain a record of this application review, decision, and authorization of outline audit plan
883 arrangements (including any limitations, and/or special considerations and/or justifications).
884

885 *Note: The SA8000 LA referred to in the above requirement may or may not be a part of the audit team assigned*
886 *to the applicant.*
887

888 9.2.2 Audit Team Selection and Assignments

889 **Additional:**

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890 9.2.2.1.6 CBs SHALL NOT use any staff member from one of their certified clients [certified to any management
891 system standard] to act as an SA8000 auditor of another client.
892

893 9.6.4 Special Audits

894 **Additional:**

895 9.6.4.3 The CB SHALL have a documented procedure describing how it will perform duplicate audits on-site each year.
896 A duplicate audit in principle repeats the audit that was performed previously to check if the audit findings are credible.

897 These duplicate audit SHALL be performed as follows, in addition to that identified in 7.5.4.4 above:

- 898 a) A minimum of one duplicate audit on-site for every 100 SA8000 audits globally that the CB performs.
- 899 b) The duplicate audit SHALL be based on a risk assessment conducted by the CB.
- 900 c) The results of these audits SHALL be made available to the SAAS auditor at the time of the annual Head
901 Office Audit.

902 10 Management system requirements for certification bodies

903 **Additional:**

904 10.3.4.1 The CB SHALL maintain detailed records of management review planning, deliberations, outcomes and
905 decisions that fully describe the discussions held.
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909

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ANNEX B - SAAS Documents

Normative Documents

ISO/IEC 17021-1:2015 - Conformity audit — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements
 ISO/IEC 17011:2004 General requirements for accreditation bodies accrediting conformity audit bodies
 ISO 19011:2011 Guidelines for auditing management systems
 SA8000:2014 Standard
 SAAS Procedure 200:2015: Audit Requirements for Accredited Certification Bodies for the SA8000 Program
 SAAS Procedure 201A Accreditation Requirements - For Use By Certification Bodies Performing SAAS Accredited SA8000:2014 Certification Audits
 SAAS Procedure 201B:2015 Social Accountability Audit Personnel Competence Requirements
 Procedure 304 Guidelines for Making a Complaint or Appeal

Guidance Documents

ISO 9001:2008 Quality management systems – Requirements
 ISO 9004:2009 Managing for the sustained success of an organisation -- A quality management approach
 BS OHSAS 18001:2007 - Occupational health and safety management systems. Requirements
 BS OHSAS 18002:2008 - Occupational health and safety management systems. Guidelines for the implementation of OHSAS 18001:2007
 ISO 31000:2009 - Risk management -- Principles and guidelines
 IEC 31010:2009 - Risk management -- Risk audit techniques
 SA8000:2014 Guidance Document
 SA8000:2014 Certification Exclusion List
 SA8000:2014 Performance Indicator Annex
 ANAB Heads Up Issue: 137 - Re: Improved Corrective Action Responses [<http://anab.org/media/1899/hu137.pdf>]

Other SAAS Documents

Forms

Form 312 Document Review Report
 Form 313 Office Audit Report
 Form 315 Witness Audit Report
 Form 406 Schedule of SAAS Fees
 Form 413 Opening and Closing Meeting Attendance Form
 Form 415A Corrective Action Request
 Form 415B Corrective Action Request – CB Response
 Form 419 Accreditation & Applicant Register
 Form 423 Confidentiality Agreement
 Form 435 Accreditation Application

Letters

Letter 602 Acknowledgement of Application
 Letter 604 Acceptance of Application
 Letter 605 Application Declined Letter
 Letter 611 Advice of Negative Accreditation Decision
 Letter 612 Advice of Positive Accreditation Decision
 Letter 613 Letter of Auditor Appointment

Authors: L. Bernstein & P. Scott	Social Accountability Accreditation Services	Issue: 1
Approval: Rochelle Zaid	SAAS Procedure 201A:2015	Effective: October 6, 2015

ANNEX C – USE OF SAAS ACCREDITATION LOGO

USE OF SAAS ACCREDITATION LOGO

1. An accredited Certification Body may use the SAAS accreditation symbol for SA8000, hereinafter referred to as the accreditation mark, only in conjunction with its own certification symbol on its certificates, stationery and literature associated with its accredited certification activities, subject to the conditions below.
2. An SA8000-certified organisation may use the SAAS accreditation mark for SA8000 only in conjunction with the accredited CB's certification mark on the organisation's stationery, literature, and website subject to the conditions below and to the CB's own conditions for use of its certification mark.
3. The SAAS accreditation mark for SA8000 SHALL be reproduced:
 - a. In the specified colors below or in the predominant color of the letterhead or printing, per the SAAS accreditation mark color requirements;
 - b. On a clearly contrasting background;
 - c. The mark may be reversed (i.e., negative of the above example) provided the background on which it is displayed is dark enough to clearly identify and display the entire mark;
 - d. In a size which makes all features of the mark clearly distinguishable.
4. When using the SAAS accreditation mark for SA8000 by either the CB or the certified organisation, its size shall not differ from the size of the CB's mark.
5. The SAAS accreditation mark for SA8000 SHALL not be used by a SAAS-accredited CB on any document, website, or other such public material unless the document relates in whole or in part to certification activities of the CB that are accredited by SAAS. This SHALL not prevent a SAAS-accredited CB from including the accreditation mark on its pre-printed letterhead paper.
6. Neither the CB's mark nor the SAAS accreditation mark for SA8000 SHALL be used on a product by a certified organisation, its labelling or packaging, or in such a way as to suggest that the CB or SAAS have certified or approved any product, process or service of a certified organisation, or in any other misleading manner.
7. If necessary, other requirements with regard to the use of marks shall be developed in consultation with individual CBs. Such requirements shall be made part of the accreditation agreement and the CB shall immediately be subject to such requirements.
8. The use of the SAAS accreditation mark for SA8000 SHALL be audited during each surveillance and reaccreditation audit by SAAS. Any non-conformance associated with the use of the mark requires the issuance of a CAR, requiring remedial action to correct the use of the mark on issued documents as well as corrective action for future use.
9. The CB SHALL audit the use of the mark by SA8000-certified organisations during every surveillance and recertification audit. Any non-conformance associated with the use of the mark requires the issuance of a CAR by the CB, requiring remedial action to correct the use of the mark on issued documents as well as corrective action for future use.

Authors: L. Bernstein & P. Scott	Social Accountability Accreditation Services	Issue: 1
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006
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008
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013

1. 'Social Accountability Accreditation Services' – Light Grey - Pantone 416U
2. People sitting around inner circle (table) – Medium Blue - Pantone 301U
3. Inner circle (table) – Dark Blue - Pantone 268U
4. 'SA8000' inside of banner – Red - Pantone 200U
5. Banner at bottom – Dark Blue - Pantone 268U



Figure 10 - SAAS SA8000 Mark

014
015
016
017
018

ANNEX D – SA8000 CB Regular Data Submission

General

SAAS has taken the following document as guidance in the matter of data that should be provided by its accredited CBs:
IAF Mandatory Document for the Collection of Data to Provide Indicators of Management System Certification Bodies' Performance Issue 1 (IAF MD15:2014)

SAAS Data Submission Requirements

All SAAS Accredited CBs are required to submit the following data to SAAS. Failure to do so SHALL result in the CB SAAS-CM initially raising a Minor NC on the CB.

Data Requirement	January 1 st	April 1 st	July 1 st	October 1 st
List of Certified Clients	x	x	x	x
SA8000 Revenue	x		x	
List of N/Cs Issued by Client		X (for previous year)		
List of Complaints	x		x	

Figure 11 – Data Submission Requirements

----- End of Document -----