

Dear CB SA8000 Program Manager,

We hope you are all keeping well. Welcome to the first SAAS “Accreditation Issues Update” of 2023. This official SAAS notification serves to keep you abreast of ongoing significant SA8000 Accreditation Program (and other) issues.

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## **SAAS COVID-19 Alternative Process Requirements – Suspended**

Previously published SAAS COVID-19 Alternative Process Requirements for the SA8000 Program ([Rev, 12 August 22, 2022](#)) remain in place and unchanged at this time (on a ‘just-in-case’ basis), however, at this time we see no justification the continuing use of these alternative requirements. Because of this, we now consider these requirements ‘Suspended’.

- CBs should now be following ‘regular’ on-site audit protocols fully in accordance with SAAS procedure 200 (version 4.2 – March 2020), including unannounced/semi-announced audits as required by procedure 200.
- Should any deviation from SAAS Procedure 200 be required for any reason, CB shall (on a client-by-client basis and before proceeding with any certification activity):
  - 1) Fully document and validate any/all reasons for the exception;
  - 2) Fully document and justify an alternative plan to provide adequate assurance of SA8000 conformity into the future (including future on-site visits);
  - 3) Respond to any questions raised by SAAS representatives;
  - 4) Receive written approval for 1 and 2 from the SAAS Technical Director (or SAAS Executive Director).

## **SAAS Procedure 200 – Annual Surveillance – Now Required**

In accordance with [SA8000 – Interpretive Supplement #2 - Annual On-Site Surveillance Audit Program: CB Background Information](#) (Introduced in May 2019) from April 1, 2023, all CB SA8000 certification should now be evaluated in accordance with SAAS procedure 200 ‘annual’ audit requirements. Presently, the only exceptions to annual surveillance requirements are for those certified companies that meet all requirements of SAAS procedure 200 v4.2 paragraph 21 “Multi-site Certification Audits” – i.e. clients with three or more operational locations.

### **SAAS Procedure 200 Advisory 2022-1: SA8000 Interpretation: Use of Consultants**

CBs are reminded that the normative document, “[SAAS Procedure 200 Advisory 2022-1.1: SA8000 Interpretation: Use of Consultants](#)” requires ongoing attention throughout 2023. Each CB’s action plan and demonstrable progress against that plan will be reviewed during SAAS’ 2023 accreditation audit and MSV (market surveillance visits) programs.

Please note:

- 1) The short-term (recommended document) “2022-1: Audit Verification Form Template” has now been superseded by required entries to the SAI Audit Tool. The form has, therefore, been removed from the SAAS documentation website. CBs may continue to use this form (or their own equivalent) for onsite data gathering, however, it’s use is not mandatory. CBs should ensure that the additional ‘consultant’ data fields (added to the Client Profile section of the SAI Audit Tool) are being properly completed for each client.
- 2) The (recommended document) “[Advisory 2022-1: CB Action Plan Template](#)” remains available for CB use at this time. It will also be withdrawn in due course.

### **2023 Accreditation Program – In Progress**

Each CB should, by now, have received a communication from their assigned 2023 SAAS Lead Auditor. Many Kick-off meetings and a handful of audits have already taken place. If you are confused about your CB’s 2023 audit program, please contact the assigned Lead Auditor for clarification as soon as possible. Please note (for your advance information), the following list represents (in no particular order) some of the ‘major focus areas’ that SAAS management has asked Lead Auditors to review in 2023:

- a. Routine and conformant implementation of SAAS procedure 200:
  - No more remote audits etc. (special COVID protocols withdrawn);
  - SA8000 clients are subject to annual surveillance;
  - Multi-site clients legitimately qualify for the multi-site certification alternative process
- b. CB implementation of Advisory 2022-1;
- c. Use of SAI audit tool;
- d. Effectiveness and integrity of audit ‘technical reviews’;
- e. KPI data maintained, analyzed, and utilized to drive improvements;
- f. CB affiliate and head office integrity such as:
  - Falsification of type of audit performed (on-site vs. remote);
  - Falsification of audit effort (e.g. 4 auditors on-site for 2 days vs. 2 auditors for 1 day);

- Auditors reported to be in 2 locations on consecutive days with impossible travel;
- CBs falsifying KPIs and monitoring records (info provided by CBs employees or contractors);
- Falsification of subcontract auditor work orders: lack of evidence of auditor travel, invoices. Was the auditor actually on-site?;
- Independence/conflicts-of-interest of consultants used by CBs;
- CB head office staff logging-in to SAI tool to change audit records without justification and authorization of the Lead Auditor;
- Auditors monitoring friends/associates and conflicts-of-interest between audit team members (friends/spouses);
- Poor or nonexistent soft auditing/grading monitoring;
- CBs ignoring/hiding whistle-blower complaints;
- CBs ignoring/hiding complaints from stakeholders.

*Note 1: The Advisory and Annual Surveillance requirements can be found in the publicly available [Document Library](#) on our website.*

*Note 2: Where inappropriate CB activity is observed, SAAS auditors have been instructed to require immediate remedial and corrective action on the part of both the CB and (where appropriate) its client(s).*

## **SA8000 Market Surveillance Visit (MSV) Program –2023-2024 Program Under Development**

As you may already be aware, the prior (2022-2023) program was curtailed in order to address ‘consultant issues’ raised in India. Taking these 2022 findings into account, a 2023-2024 MSV program, with a renewed focus and scope, is now under development. The 2023-2024 program will comprise a combination of on-site (MSVs) and remote (RMSVs) across a broader geographic scope than has been considered previously. Watch for a further announcement regarding this program in the next couple of months. MSV activities conducted will be in addition to routine SAAS accreditation oversight (above).

## **SAI Database – Omissions and Delays**

We thank all CBs for compiling certification records in the SAI database. With broader and continuing use, several database shortcomings have been identified. These will be prioritized and addressed by SAI over time. Please continue to report any/all database reporting (and other) anomalies to Chris Lamoureux at SAI as soon as possible ([CLamoureux@sa-intl.org](mailto:CLamoureux@sa-intl.org)).

As conveyed previously, SAAS recognizes that CBs’ use of the database may contradict certain specific requirements in SAAS Procedure 200 (‘Audit Requirements for Accredited Certification Bodies for the SA8000 Program’). At the present time, SAAS auditors have been instructed to recognize and record such deviations, but not cite ‘database only’ instances as nonconformities or OFIs.

Increasingly SAAS is being asked (by SAI and SA8000 stakeholders) to ensure that CBs are held accountable for the completeness and integrity of data entered (their own data, and their clients' data). We anticipate that SAAS procedure 200 will be updated during 2023 to specify requirements for database use, following which SAAS will be required to raise nonconformities for omissions etc.

The SAI database presently has many data omissions due to either lack-of-attention, or to unacceptably delayed data entry. Two common significant database operational shortcomings are:

- 1) For the database to be of value to users, CBs must enter data to their own systems and to the SAI database concurrently, and in 'near-real-time'.
- 2) Audit plans must be sent to client and uploaded to SAI database 21 days prior to the audit (per SAAS Procedure 200).

### **Other Significant Issues – For Specific CB Auditor/Management Attention**

#### **APSCA:**

If your organization is an APSCA member, please remember that APSCA rules apply to SA8000 audits. We ask each affected CB to please keep abreast of APSCA requirements directly, and ensure that they are consistently met for SA8000 (as well as other) audits.

*Note: As always, SAAS auditors are instructed to apply current SAAS Procedure 201B requirements when evaluating the competence of CB personnel (irrespective of a CB's, or auditor's APSCA status).*

#### **SA8000 CB Calibration:**

Major changes to SAAS Procedures 200, 201A, and 201B are in the pipeline and will be the subject of the next CB calibration sessions. The timeline for completion of these changes remains uncertain at present, therefore we have not yet fixed a date for the next 'CB Calibration' (possibly late in 2023, or we may defer until 2024).

#### **IRIS Auditor Training:**

(See attached flier). The next IRIS Auditor Training will be conducted in Kuala Lumpur, Malaysia, on June 19-23, 2023. A limited number of places (fewer than 10) are available for well-experienced auditors who are looking to expand their qualifications with a view to delivering IRIS audits and certification services in the future. Should your organization have suitable candidate(s) who are available and committed, please respond directly to [John Brookes](#) by April 30, including the bio/resume for the proposed attendee and a brief justification for why this individual would be well-suited to attend this training. The email subject line should state: "IRIS Auditor Training – KL – Request". Please do not include other communication in the email request. Although this training is fully funded, a nominal administrative fee may be charged

(depending on attendance numbers etc.) (For further information about the IRIS Certification Scheme, see <https://iris.iom.int/> and <https://iriscertification.org/> )

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*Note: These 'Accreditation Issue Updates' remain 'advisory' in nature – i.e. although these updates may be used to advise CBs of changes to accreditation requirements, the changes themselves will not be defined within other 'normative' documents. SAAS Accreditation Issue Updates are aimed primarily at CB SA8000 Program Managers, however, SAAS anticipates that critical information contained in these updates be appropriately promulgated to all CB SA8000 staff and auditors .*

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