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Scheme Requirements 201C – SA8000 Scheme-Specific Supplementary Policies and Processes for Conformity Assessment Bodies

**For use by: SA8000 Accredited & Applicant Conformity
Assessment Bodies**

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1. Revision History

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3. Introduction

SA8000 is a multi-stakeholder international standard designed to improve working conditions worldwide. Through the process of accredited certification, organizations can demonstrate that their practices align with contemporary expectations for decent work, providing assurance to consumers, buyers, and other stakeholders concerned with labor conditions.

This document, Scheme Requirements 201C – “SA8000 Scheme-Specific Supplementary Policies and Processes for Conformity Assessment Bodies” is one of several documents published by SAI (and invoked through accreditation agreements) which specify requirements for SA8000 Accredited & Applicant Conformity Assessment Bodies.

- (a) Scheme Requirements* 200: SA8000 Scheme-Specific Audit Requirements for Conformity Assessment Bodies.
- (b) Scheme Requirements* 201A: SA8000 Scheme-Specific Core Accreditation Requirements for Conformity Assessment Bodies Undertaking SA8000 Certification.
- (c) Scheme Requirements* 201B: SA8000 Scheme-Specific Competence and Maintenance Requirements for Conformity Assessment Body Personnel.
- (d) Scheme Requirements 201C (this document): SA8000 Scheme-Specific Supplementary Policies and Processes for Conformity Assessment Bodies.

The requirements specified within this document (Scheme Requirements* 201C – “SA8000 Scheme-Specific Supplementary Policies and Processes for Conformity Assessment Bodies”) have been developed and published to complement and/or clarify (and do not in any way replace) requirements within the other SA8000 Scheme documents listed above. From time to time, SAI may amend these supplementary requirements, or publish additional supplementary requirements, through future revisions to this document.

**These documents are currently/historically referred to as ‘SAAS procedures.’ At the time of the initial publication of this document, all documents are in the process of being renamed and updated. In accordance with international accreditation nomenclature, this document uses the term “Conformity Assessment Body.” APSCA typically uses the term “Member Audit Company” (or similar) to refer to those accredited Conformity Assessment Bodies holding, or applying for APSCA membership.*

4. Purpose

The purpose of this document is to supplement other SAI Scheme Owner requirements documents for SA8000 Conformity Assessment Bodies. Although the requirements in this document are considered ‘supplementary,’ they are (as/unless stated otherwise within this document) considered mandatory Scheme Owner (SAI) requirements to be met by all Conformity Assessment Bodies and to be evaluated in conjunction with oversight of other core SA8000 accredited certification scheme requirements.

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5. 201C Section 1 – APSCA Membership Policies and Processes

5.1 Requirements

- a) The requirements of this section have been developed collaboratively with the Association of Professional Social Compliance Auditors (APSCA) in order to promulgate consistent interpretation and application of specific, supplementary, SAI policy and process requirements.
- b) The publication of this document addresses SAI’s APSCA-related policies and processes for the SA8000 Accredited Certification Scheme.

5.2 SAI General Policy on the use of APSCA Auditors for SA8000 audits

- a) Effective January 1, 2026, SA8000 audits shall be conducted by an APSCA Certified Social Compliance Auditor (CSCA) or by an APSCA Associate Social Compliance Auditor (ASCA) under the direct supervision of an APSCA CSCA.
- b) The CSCA is required to be on-site and physically present for the full duration of all social compliance audit activity.
- c) Note 1: The term ‘audits’ here includes all SA8000 audit types mentioned in Scheme Requirements 200: “SA8000 Scheme-Specific Audit Requirements for Conformity Assessment Bodies” (also known as ‘Procedure 200’).
- d) Note 2: This requirement is in addition to, and does not replace, requirements specified in Scheme Requirements 201B: “SA8000 Scheme-Specific Competence and Maintenance Requirements for Conformity Assessment Body Personnel” (also known as ‘Procedure 201B’).

5.3 Non-conformity with ‘General Policy on the use of APSCA Auditors for SA8000 audits’ (5.2, above)

- a) Adherence to the requirements of 5.2 shall be tracked in the SAI Database, reviewed by SAI (continuously), and periodically by Accreditation Auditors (during regular accreditation activities).
- b) Data relevant to adherence gathered by SAI shall be shared regularly with APSCA.
- c) APSCA shall be responsible for managing any adherence issues indicated by shared data.
- d) APSCA shall notify SAI of any disciplinary sanction of remediation planning it imposes upon an SA8000 Conformity Assessment Body failing to meet mutually agreed APSCA CSCA use requirements (See 5.5 below also).

5.4 SAI General Policy on APSCA Membership

- a) Current Accredited Conformity Assessment Bodies delivering SA8000 audits were required to have applied for APSCA membership by June 1, 2025, and must be accepted as provisional or full APSCA members within 12 months of applying.
- b) Prospective SA8000 Conformity Assessment Bodies shall be approved/provisional APSCA members prior to any application to be considered as an SA8000 Conformity Assessment Body.
- c) In addition to SAI’s SA8000 scheme requirements (see paragraph 3 of this document), from June 1, 2025 SA8000 Conformity Assessment Bodies shall adhere to APSCA’s Code, Competency Framework, and related procedures.
- d) In the event that a Conformity Assessment Body’s APSCA membership is revoked by APSCA, SA8000 Accreditation shall similarly be withdrawn.
- e) Note: This General SAI policy was previously notified to accredited Conformity Assessment Bodies via email (May 24th, 2024).

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5.5 SAI Policy on Conformity Assessment Body Ethics, Integrity or Legal Infractions/Investigations

- a) SAI and APSCA shall collaborate with respect to alleged Conformity Assessment Body ethics, integrity, or legal infractions that may contravene the requirements of both schemes. Such collaboration may include sharing of relevant information and data related to the alleged infraction.
- b) APSCA and SAI may mutually agree appropriate planning, resources, actions, records and reporting required to investigate the infraction or allegation.
- c) SAI shall report to APSCA any mutual CAB or scheme auditor:
 1. allegation of professional misconduct
 2. progress and outcome of investigation
 3. suspension or withdrawal of accreditation of an SA8000 Conformity Assessment Body related to ethics, integrity or legal compliance issues.

5.6 SAI Policy on Discipline and Suspensions

- a) SA8000 Conformity Assessment Bodies are required to share, in a timely manner, full details (communications, timelines, outcomes, remediation planning, personnel involved, etc.) relevant to pending and ongoing APSCA Disciplinary Review and Disciplinary Outcomes of APSCA Member Firms and APSCA Member Auditors. Appropriate disciplinary measures may additionally be applied by SAI.
- b) In the event APSCA suspends an SA8000 Conformity Assessment Body, SAI expects the SA8000 Conformity Assessment Body to adhere to the terms of the suspension. In such cases, SAI and the SA8000 Accreditation Body shall address any interactions between the APSCA suspension terms and SA8000 Scheme Requirements.
- c) In the event the SA8000 Accreditation Body intends to suspend an SA8000 Conformity Assessment Body for issues related to ethics, integrity or legal compliance, SAI shall inform APSCA in a timely manner.

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6. 201C Section 2 – CAB Assessment and Assurance of Unusual Labour Risks

6.1 Policy

- a) SAI requires that a CAB shall effectively consider, identify, evaluate, and appropriately act upon potential challenges to verification both before and during SA8000 certification activities, thereby assuring that certification is granted (or maintained) in cases where sufficient assurance is available to adequately safeguard workers' rights.

6.2 Scope

- a) This document confirms and clarifies existing SA8000 Scheme expectations for a Conformity Assessment Body (CAB) that finds itself (through contract review, audit, or associated means) unable to access sufficient evidence to confidently assure the absence of systemic labor risks within an organization, or to which the organization may be contributing or be linked.
- b) This policy applies to SA8000 applicants, certified companies, and all associated audits conducted by the Conformity Assessment Body (CAB) — including Stage 2, Surveillance, Recertification, and special purpose audits or investigations.
- c) Note: The requirements of this document apply only in cases of 'insufficient evidence to confidently assure...'. Where assessment of indicators provides sufficient evidence against SA8000 criteria, the CAB shall raise audit findings in the usual manner (refer to SAI Scheme Requirements 200: SA8000 Scheme-Specific Audit Requirements for Conformity Assessment Bodies).
- d) Note: This document expands upon SAI Scheme Requirements 200: SA8000 Scheme-Specific Audit Requirements for Conformity Assessment Bodies.

6.3 Rationale

- a) This document provides clarifications to CABs assessing SA8000 clients and certification decision-making and applies to cases where a CAB faces challenges in assessing and verifying labor risks in sufficient depth. This may be due to highly complex, inaccessible, or not transparent labor risks.
- b) Although SA8000 scheme requirements and guidance have always held the expectations contained herein, this document formally reiterates SAI's policy, and defines the scope, rationale, and process requirements for addressing situations where access to sufficient audit evidence is unreasonably or excessively limited through circumstances beyond the control of the CAB.

6.4 CAB Commitment to Managing Unverifiable Risks

- a) With respect to the content and requirements of this document, the CAB shall:
 1. Not certify, shall suspend, or shall revoke certification of an organization (as applicable) where: CAB management, in conjunction with SA8000 Audit Team Leader(s), determines that workers' rights, risks, and impacts cannot be effectively assessed or verified through standard audit processes (including worker interviews and documentation review).
 2. Document and justify all actions and decisions taken.
 3. Transparently communicate decisions taken to the applicant/certified organization.

6.5 Considerations for Determining Whether Assurance is Possible

- a) The CAB shall consider, at minimum, the following risk indicators:
 1. Significant risks beyond the direct control of the organization.
 2. Lack of technical knowledge on the audit team.

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3. Lack of gender representation (where indicated) on the audit team.
4. Lack of client resources to cover sufficient assurance mechanisms.
5. Decentralized management/ownership of the organization outside the scope of the certification.
6. Limitations on worker interviews due to non-accessibility, language, fear of retaliation, or surveillance.
7. Lack of credible grievance mechanisms accessible to vulnerable workers.
8. Legal frameworks (whether in regions of employment or regions of worker origin) that inhibit fair recruitment or equal treatment.

6.6 Process

- a) During application, audit planning, or stakeholder-driven review, organizations with significant assurance requirements shall be identified and subject to enhanced risk screening by an SA8000 Senior/Advanced Auditor.
- b) Enhanced risk screening shall consider (as a minimum) risk indicators identified in 6.5 above.
- c) Where elevated risks are identified, the SA8000 Senior/Advanced Auditor (after consultation with others, as appropriate) shall determine whether and how such risks can be effectively addressed through additional audit measures (e.g., off-site interviews, language support, document tracing, stakeholder consultation).
- d) If it is determined that audit teams (by applying additional certification/audit measures) should be able to adequately assess and verify evidence related to these risks, the CAB shall:
 1. Develop a certification and audit plan(s) defining the additional certification/audit measures needed to adequately address the identified risks. Such controls often include non-standard audit activities (e.g. off-site interviews); access to and in-depth review of additional conformity indicators; expanded and special sampling protocols (e.g. additional time and focus on potential indicators);
 2. Execute certification and audit plans in accordance with additional certification/audit measures planned (above);
 3. Discontinue audit and/or certification in accordance with requirements (above) in those cases where it is subsequently determined that workers' rights risks and impacts cannot be effectively assessed, or verified.
- e) If, at any stage, the CAB determines elevated risks cannot be adequately assessed or mitigated, it shall:
 1. Issue a formal justification and decline to proceed with certification (or suspend/rescind an existing certificate), and
 2. Provide the organization with written notice including the rationale and possible conditions under which reapplication may be considered.

6.7 Appeals and Reapplication

- a) An organization may appeal the decision per the CAB's appeals process.
- b) Reapplication may be considered if the organization can demonstrate meaningful policy and processes to transparently manage the risks related to inadequate assurance.

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7. 201C Section 3

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