



Responsible Business Alliance

Formerly the Electronic Industry Citizenship Coalition

Advancing Sustainability Globally

2017

RBA Auditor Guidebook[©]



Table of Contents

1. Auditors*	3
Auditor Responsibilities.....	3
Audit Team Members.....	4
2. Audit Firm Information	4
3. Auditor Competencies	5
General Competencies for all Auditors	5
Competencies Required for All Labor & Ethics Auditors	5
Competencies Required for All EHS Auditors	6
4. Experience – Labor & Ethics.....	6
Labor & Ethics “Lead Auditor”	6
Labor & Ethics “Auditor”	7
Labor & Ethics “Provisional Auditor”	7
5. Experience – Environment, Health and Safety (EHS)	9
EHS “Lead Auditor”	9
EHS “Auditor”	9
EHS “Provisional Auditor”	9
6. Auditor Training Requirements	10
Initial Training – RBA Code-Related Training Courses.....	10
Renewal and Continual Professional Development (CPD).....	12
7. Summary of Auditor Requirements	14
8. Currently Approved Auditors.....	16
9. Acceptability of Standards, Codes and Other Audit Criteria.....	16
10. Associated Costs	16
11. The Approval Period	17
12. Re-Application by Terminated or Expired Auditors	17
13. How to Reclassify	17
14. Confidentiality	18
15. Approval Termination.....	18
Auditor Termination.....	18
Audit Firm Approval Termination	20



RBA Auditor Management

1. Auditors*

It is required that Auditors who participate in VAP/CMA/AMA/SVAP** on forced labor audits be RBA-approved Auditors. See “Audit Team Members.” Audit Firms are responsible for assigning their RBA-approved Auditors for upcoming audits. RBA members are responsible to ensure that only RBA-approved Auditors are appointed for CMA and AMA audits.

It is the responsibility of the Auditor to not only conduct the audit, but also take steps in Auditor preparation, on-site audit and report writing.

*The term “Auditor” throughout this document generally refers to RBA VAP, CMA, AMA and SVAP Auditors. Internal Auditors of RBA member companies shall also comply with the qualification criteria listed in this guidebook if they wish to seek registration as RBA-approved Auditors with RBA.

** VAP = Validated Audit Program; CMA = Customer Managed Audit; AMA= Auditee Managed Audit, SVAP = Supplemental VAP on forced Labor.

Auditor Responsibilities

The audit must be conducted in accordance with the expectations outlined in the RBA VAP Operations Manual.

Auditor responsibilities include:

- Executing the audit:
 - ❖ Audit preparation
 - ❖ Conducting the audit
 - ❖ Finalizing the report
 - ❖ Providing the proper documentation
- Conducting the audit in accordance with the contents of the RBA VAP Operations Manual and following RBA Audit Protocols
- Understanding applicable national, regional and local regulatory requirements
- Applying RBA Standards and Code interpretations, as well as applicable national, regional and local regulatory requirements
- Participating in the opening, closing and other necessary meetings
- Preparing findings, including complete descriptions of supporting evidence, for all assigned audit criteria questions, as required by the RBA Audit Protocol
- Acting in an honest and ethical manner
- Escalating all “Priority” Non-Conformances as required by the RBA
- Gathering field notes and copies of evidence (documents, photos) upon completion of the Audit report, and providing to the Audit Program Manager (APM) as needed



Audit Team Members

Auditors participating in RBA audits must be “RBA Approved.” Individuals must have the competencies, experience and/or education and training required to be approved for each discipline – Labor & Ethics, forced labor and Environment, Health and Safety (EHS).

Auditors can be approved for one of the following categories:

- RBA Lead Auditor
- RBA Auditor
- RBA Provisional Auditor

The RBA audit team must always consist of at least one “Lead Auditor” for both EHS and Labor & Ethics elements. Exception: only one Lead Auditor is required for a closure audit where review is on either EHS or Labor & Ethics issues.

At least 51 percent of the audit team must be a “Lead Auditor” or “RBA Auditor.” Provisional Auditors may make up less than 50 percent of the audit team (therefore, if there are two Auditors, neither may be Provisional; if there are three Auditors, one may be Provisional; if there are four Auditors, one may be Provisional; if there are five auditors, two may be Provisional).

Non-approved Auditors may attend and observe the audit. Non-approved Auditors attending audits are required to follow the same RBA Auditor standards regarding professionalism and ethical behavior, and must follow the audit process.

2. Audit Firm Information

RBA audits are open to all RBA-approved audit companies for RBA VAP audits that meet and agree to follow the RBA Code. VAP audits are assigned based on availability of the Auditors, quality of previous audits, and cost. In addition, a preference is given to local Auditors (as opposed to Auditors who must “fly in” to do audits).

Audit Firms that participate in the RBA program must:

- Agree to the contract provided in the audit scheduling process
- Have the required insurance
- Commit to requiring and enforcing ethical behavior with their Auditors
- Pledge to confidentiality
- Accredited by another accreditation body (ISO accreditation from various accreditation councils) by Jan. 1, 2019
- Perform at least 20 VAP audits in each calendar year
- Maintained at least 20 RBA approved auditors within the audit firm
- For new audit firm, minimum of 10 qualified RBA Lead Auditors (minimum of 5 each for Labor Ethics and EHS), increase to 15 qualified auditors at the start of 3rd year and 25 qualified auditors at the start of 5th year

In certain cases, audit firms may be suspended or terminated due to issues with their individual auditors. For CMA and AMA audits, RBA members have the responsibility to ensure that the Auditors appointed are RBA-approved Auditors.



3. Auditor Competencies

All Auditors must exhibit the proper competencies to conduct RBA audits. While all Auditors must display certain competencies, Lead Auditors must hold **additional** competencies to ensure they can properly lead audits. Additionally, there are differences between competencies needed for EHS, Labor & Ethics and Forced Labor Auditors.

As mentioned earlier, Auditors can be approved for all disciplines, namely Labor & Ethics, Forced Labor and EHS. In order to qualify, an Auditor must meet the requirements for each designation, including participating in the required number of EHS, Labor & Ethics and Forced labor audits. All new applicants and reclassifying Auditors may use relevant types of audits to support their applications, i.e., ISO 14001 and OHSAS 18001, RBA VAP/CMA /AMA; SA8000. For renewal of qualifications, only RBA VAP, CMA and AMA audits are acceptable.

The RBA may, at any time, send an RBA employee or appointed agent to shadow an auditor. The information obtained in this shadow audit will be used for training purposes and to continuously improve the quality and credibility of the RBA Audit program.

By Jan. 1, 2020, all auditors must have an additional third-party certification (ISO 9001, ISO 14001, OHSAS 18001, SA 8000, IRCA certification, etc.) in order to perform RBA audits.

General Competencies for all Auditors

- Knowledge of general auditing principles that qualify the Auditor to conduct audits in an accurate and systematic manner
- Ability to understand reference documents that enable the Auditor to apply audit criteria
- Knowledge and/or experience that empowers the Auditor to comprehend an organization's operational and industry context
- Knowledge of applicable laws, regulations and other requirements relevant to the auditee's situation
- Ability to communicate clearly, orally and in writing, with personnel at all levels of an organization, including workers, the APM and RBA staff
- Ability to determine the conformance of a system designed to meet the RBA requirements
- Ability to generate accurate, appropriate and responsible Audit findings and conclusions
- Experience upholding the principles of proper ethical conduct, fair presentation and due professional care

Competencies Required for All Labor, Ethics and Forced Labor Auditors

- Knowledge of internationally accepted human rights norms, laws and regulations relating to labor and ethics issues
- Knowledge of relevant industry codes of practice, legal requirements, guidelines and standards relating to labor and ethics
- Knowledge of relevant international, national and local judicial systems and legislative frameworks
- Knowledge of relevant social responsibility and labor culture, trade unions, NGOs (Non-Governmental Organizations) and other interested parties within the country or area of operation



Competencies Required for All EHS Auditors

- Knowledge of internationally accepted Environmental, Health and Safety practices
- Knowledge of relevant industry codes of practice, legal requirements, guidelines and standards relating to EHS
- Knowledge of relevant international, national and local judicial systems and legislative frameworks
- Knowledge of relevant EHS culture, NGOs (Non-Governmental Organizations) and other interested parties within the country or area of operation

4. Experience – Labor & Ethics; Forced Labor

Auditors must have the required experience to be approved to conduct RBA audits. This experience may include education.

Labor & Ethics “Lead Auditor”

One of the following pathways must be met for approval as a Labor & Ethics Lead Auditor:

- **Pathway 1 – Work Experience Only:**
 - ❖ At least six years of work experience as an Auditor or work similar to an Auditor, or managing Auditors and/or involvement in auditing processes
 - At least two of those years must be spent conducting Labor & Ethics audits
 - Participation in at least 25 audits focused on Labor & Ethics in the previous 24 months
- **Pathway 2 – Work Experience and Education:**
 - ❖ A combination of at least six years of experience and relevant education, which may include one of the following:
 - 4-year university/college degree plus two years auditing experience
 - 3-year university/college degree plus three years auditing experience
 - 2-year university/college degree plus four years auditing experience
 - At least two years conducting Labor & Ethics audits
 - Participation in at least 25 audits focused on Labor & Ethics in the previous 24 months
 - NOTE: Relevant education includes study in a closely related field (Human Resources Management, Ethics, Legal/Lawyer, etc.)
- Or a valid RBA IRCA Lead Auditor Certification for Labor and Ethics



Labor & Ethics “Auditor”

One of the following pathways must be met for approval as a Labor & Ethics Auditor:

- **Pathway 1 – Work Experience Only:**
 - ❖ At least four years of work experience as an Auditor or work similar to an Auditor, or managing Auditors or auditing processes
 - At least two of those years must be spent conducting Labor & Ethics audits
 - Participation in at least 25 audits focused on Labor & Ethics in the previous 24 months
- **Pathway 2 – Work Experience and Education:**
 - ❖ A combination of at least four years of experience and relevant education, which may include one of the following:
 - 3-year relevant university/college degree plus one year of auditing experience
 - 2-year relevant university/college degree plus two years of auditing experience
 - At least one of those years must be spent conducting Labor & Ethics audits
 - Participation in at least 25 audits focused on Labor & Ethics in the previous 24 months
 - NOTE: Relevant education includes study in a closely related field (Human Resources Management, Ethics, Legal/Lawyer, etc.).
- Or a valid RBA IRCA Auditor Certification for Labor and Ethics

Labor & Ethics “Provisional Auditor”

The following experience must be in place for approval as a Labor & Ethics Provisional Auditor:

- At least two years of work experience as an Auditor or work similar to an Auditor, or managing Auditors or auditing processes
- At least one of those years must be spent conducting Labor & Ethics audits
- Either (i) Participation in at least 15 audits focused on Labor & Ethics in the previous 24 months or (ii) Observe three RBA VAP/CMA/AMA audits and be observed in three RBA VAP/CMA/AMA audits in the previous 24 months.
- Or a valid RBA IRCA Provisional Auditor Certification for Labor and Ethics

Forced Labor “Lead Auditor”

One of the following pathways must be met for approval as a Forced Labor Lead Auditor:

- **Pathway 1 – Work Experience Only:**
 - ❖ At least six years of work experience as an Auditor or work similar to an Auditor, or managing Auditors and/or involvement in auditing processes
 - At least two of those years must be spent conducting Labor & Ethics audits
 - Currently an approved RBA Lead Auditor for Labor and Ethics
 - Participation in at least 10 audits for any industry with specific focus on forced labor in the previous 24 months
- **Pathway 2 – Work Experience and Education:**
 - ❖ A combination of at least six years of experience and relevant education, which may include one of the following:
 - 4-year university/college degree plus two years auditing experience
 - 3-year university/college degree plus three years auditing experience
 - 2-year university/college degree plus four years auditing experience
 - At least two years conducting Labor & Ethics audits



- Currently an approved RBA Auditor for Labor and Ethics
- Participation in at least 10 audits for any industry with specific focus on forced Labor in the previous 24 months
 - NOTE: Relevant education includes study in a closely related field (Human Resources Management, Ethics, Legal, etc.)
- Or a valid RBA IRCA Lead Auditor Certification for Labor and Ethics

Forced Labor “Auditor”

One of the following pathways must be met for approval as a Forced Labor Auditor:

- **Pathway 1 – Work Experience Only:**
 - ❖ At least four years of work experience as an Auditor or work similar to an Auditor, or managing Auditors or auditing processes
 - At least two of those years must be spent conducting Labor & Ethics audits
 - Currently an approved RBA Auditor for Labor and Ethics
 - Participation in at least 5 audits for any industry with specific focus on Forced Labor in the previous 24 months
- **Pathway 2 – Work Experience and Education:**
 - ❖ A combination of at least four years of experience and relevant education, which may include one of the following:
 - 3-year relevant university/college degree plus one year of auditing experience
 - 2-year relevant university/college degree plus two years of auditing experience
 - At least one of those years must be spent conducting Labor & Ethics audits
 - Currently an approved RBA Auditor for Labor and Ethics
 - Participation in at least 5 audits for any industry with specific focus on Forced Labor in the previous 24 months
 - NOTE: Relevant education includes study in a closely related field (Human Resources Management, Ethics, Legal etc.).
- Or a valid RBA IRCA Auditor Certification for Labor and Ethics

Forced Labor “Provisional Auditor”

The following experience must be in place for approval as a Forced Labor Provisional Auditor:

- At least two years of work experience as an Auditor or work similar to an Auditor, or managing Auditors or auditing processes
- At least one of those years must be spent conducting Labor & Ethics audits
- Currently an approved RBA Provisional Auditor for Labor and Ethics
 - Either (i) Participation in at least 2 audits for any industry with specific focus on forced labor in the previous 24 months or (ii) Observe two RBA Forced Labor audits and be observed in two RBA forced labor audits in the previous 24 months.
- Or a valid RBA IRCA Provisional Auditor Certification for Labor and Ethics



5. Experience – Environment, Health and Safety (EHS)

Auditors must have the required experience to be approved to conduct RBA audits. This experience may include education.

EHS “Lead Auditor”

One of the following pathways must be met for approval as an EHS Lead Auditor:

- **Pathway 1 – Work Experience Only:**
 - ❖ At least six years of work experience as an Auditor or work similar to an Auditor, or managing Auditors and/or working in auditing processes
 - ❖ At least two of those years must be spent conducting EHS audits
 - ❖ Participation in at least 25 audits focused on EHS in the previous 24 months
- **Pathway 2 – Work Experience and Education:**
 - ❖ A combination of six years of experience and relevant education, which may include one of the following:
 - 4-year university/college degree plus two years of auditing experience
 - 3-year university/college degree plus three years of auditing experience
 - 2-year university/college degree plus four years of auditing experience
 - At least two years conducting EHS audits
 - Participation in at least 25 audits focused on EHS in the previous 24 months
 - NOTE: Relevant education includes study in a closely related field (Fire Safety, Environmental Engineering, EHS Management, etc.)

EHS “Auditor”

One of the following pathways must be met for approval as an EHS Auditor:

- **Pathway 1 – Work Experience Only:**
 - ❖ At least four years of work experience as an Auditor or work similar to an Auditor, or managing Auditors or auditing processes
 - At least two of those years must be spent conducting EHS audits
 - Participation in at least 25 audits focused on EHS in the previous 24 months
- **Pathway 2 – Work Experience and Education:**
 - ❖ A combination of four years of experience and relevant education, which may include one of the following:
 - 3-year relevant university/college degree plus one year of auditing experience
 - 2-year relevant university/college degree plus two years of auditing experience
 - At least one of those years must be spent conducting EHS audits
 - Participation in at least 25 audits focused on EHS in the previous 24 months
 - NOTE: Relevant education includes study in a closely related field (Fire Safety, Environmental Engineering, EHS Management, etc.)

EHS “Provisional Auditor”

The following experience must be in place for approval as an EHS Provisional Auditor:



- At least two years of work experience as an Auditor or work similar to an Auditor, or managing Auditors or auditing processes
- At least one of those years must be spent conducting EHS audits
- Either (i) Participation in at least 15 audits focused on EHS in the previous 24 months or (ii) Observe three RBA VAP/CMA/AMA audits and be observed in three RBA VAP/CMA/AMA audits in the previous 24 months.

6. Auditor Training Requirements

To receive any level of certification (RBA Lead Auditor, RBA Auditor, or RBA Provisional Auditor), Auditors should attend at least one of the RBA pre-approved RBA Code-related training courses and demonstrate Auditor proficiency.

Auditors must take the appropriate training course for the certification they wish to hold; if an individual wishes to have approval in both Labor & Ethics and EHS they must attend the training for each discipline.

Initial Training – RBA Code-Related Training Courses

Prior to approval for any category, Auditors should attend and pass at least one of the following RBA Code training courses:

- “The RBA Code of Conduct (CoC) Training” facilitated by the RBA, specific to Labor & Ethics and/or EHS, depending on the discipline for which they wish to be approved
- Other public courses that are currently available and pre-approved by RBA, e.g., “The RBA Labor & Ethics Lead Auditor training” facilitated by Verité
- Audit Firm in-house course that is pre-approved by the RBA
- RBA approved Forced Labor Audit course (for Forced Labor auditors)

These courses are required for all individuals receiving their initial approval as well as any individuals who are assigned to take this training as a result of their test scores not meeting minimal expectations. All applicant or reclassifying Auditors must take the “**RBA Qualification Test**” to ensure sufficient knowledge of the RBA Code of Conduct. Applicant Auditors who do not meet the minimum requirement of 24 Continuous Professional Development (CPD) hours and three RBA audits for each discipline may also take the corresponding “**RBA Qualification Test**” to maintain the current qualification category.

Once the Auditor completes any of the RBA pre-approved RBA Code-related training courses, Forced Labor Audit course and passes the corresponding “**RBA Qualification Test**” they are approved in their respective designation for two years.

There are three RBA Qualification Test, namely RBA Labor & Ethics Qualification Test, RBA Environmental, health and Safety Qualification Test and RBA Forced Labor Qualification Test.

To pass the training, the Auditor must demonstrate the following:



- Attentiveness during the training
- The ability to comprehend the training and apply learnings during audit situations
- Understanding of the principles taught

If an individual does not pass the course, they may re-take the course at any time and attempt to meet expectations.

The RBA training is focused on the following topics:

- RBA Audit process – how the process works, definitions, etc.
- RBA Code of Conduct
- Overview of general auditing expectations and procedures
- Expectations for RBA Auditors related to ethics, bribery, gift-taking, honesty, transparency, etc.
- How to conduct an RBA audit – scope, interviews, document reviews, factory audit, triangulation of answers, etc.
- Audit Tool and RBA audit scoring methodology
- Workhour Spreadsheet

“The RBA Code of Conduct (CoC) Training” facilitated by the RBA is recommended. The attendee should have attended a basic auditing courses like an Internal Auditing Course or a Lead Auditor Course that is related to ISO standards or other relevant standards to demonstrate that the attendee has relevant auditing skills.

“The RBA Code of Conduct (CoC) Training” does not cover the following topics:

- How to conduct audits and interviews
- How to review documentation
- Other basic auditing principles
- Legal and customer requirements

“The RBA Code of Conduct (CoC) Training” is a three-and-a-half-day course. Special arrangements can be made to cater to the needs of a single discipline training, e.g., EHS or Labor and Ethics. Common modules like general RBA Information and Management Systems will be taught in both courses. Exemptions may be granted to attendees who have attended these kinds of sessions previously. For cost and training dates, log on to the RBA website for more details.

The agenda for the RBA course is as follows

- Day 1 – General RBA Information
 - ❖ Audit Process
 - ❖ RBA VAP Operations Manual
 - ❖ RBA Audit Expectations
 - ❖ RBA Audit Tools (Audit Checklist, opening meeting and closing meetings)
 - ❖ RBA Report Expectations, Tips, and Guidance
 - ❖ Ethics
 - ❖ General Audit Guidance



- Day 2 – Management System and EHS
 - ❖ Management System and EHS Questions
 - ❖ Management System and EHS Code Interpretations
 - ❖ Management System and EHS Tips and Guidance

- Day 3 – Labor & Ethics
 - ❖ Workhour Spreadsheet
 - ❖ Sampling and Worker Interviews
 - ❖ Labor & Ethics Questions
 - ❖ Labor & Ethics Code Interpretations
 - ❖ Labor & Ethics Tips and Guidance

- Day 4 (half day) – Q&A (two hours) and Test (two hours)

NOTE: as described elsewhere, an individual is approved for each discipline individually, and their 24-month approval is managed individually as well. Therefore, their EHS approval is terminated 24 months after participants successfully attend an EHS training, and their Labor and Ethics approval is terminated 24 months after successful attendance at a Labor & Ethics training.

The RBA Forced Labor Audit course is focused on the following topics:

- RBA Audit process – how the process works, definitions, etc.
- RBA Code of Conduct with specific focus on Forced Labor
- Overview of general auditing expectations and procedures
- Expectations for RBA Auditors related to ethics, bribery, gift-taking, honesty, transparency, etc.
- How to conduct an RBA forced labor audit – scope, interviews, document reviews, triangulation of answers, etc.
- Audit Tool and RBA audit scoring methodology
- Special focus on workers interviews

Auditors, worker interviewers, translators or interpreters should attend the RBA Forced Labor Audit course.

Renewal and Continual Professional Development (CPD)

On a 24-month basis, all Auditors must have completed three RBA audits (initial or renewal) (refer to Section 8 for more details). In addition, all Auditors shall collect at least 24 hours of CPD.

The CPD hours must be logged in the “**RBA Qualification/CPD Log**” and submitted to the RBA / Appointed Agent for review and approval.

The following activities could be counted as CPD hours:

- Training / webinar on the revision and/or up-date of RBA Code of Conduct, audit tools (mandatory)
- Attendance at the RBA Auditor summit (technical content only)
- RBA-related training courses organized by RBA Learning Academy
- Attendance at the RBA annual conference



- Local legal and other regulatory requirement training courses, workshops and conferences
- Other EHS, Labor and Ethics, Forced Labor-related training courses, workshops and conferences
- Internal Auditor calibration workshop (RBA-related only)

The RBA/ RBA-Appointed Agent has the sole discretion to decide on the acceptance of the CPD hours submitted.

Auditors are approved for 24 months. Two months before expiration, the Auditor shall submit the 24 hours CPD log and three RBA audits with supporting documentation. Once the “**RBA Qualification/CPD Log**” is accepted, the Auditor is approved to conduct RBA audits in their assigned category for 24 additional months.

If the approved/accepted CPD hours is less than 24 hours within the 24 months, or less than three RBA audits within the 24 months, approval to participate in RBA audits ends. However, Auditors have a 2-month window to complete the 24 CPD hours. If Auditors do not fulfill the 24 CPD hours and/or the three RBA audits after the 2-month grace period, their approval is terminated.

To become re-approved, they must attend the “The RBA Code of Conduct (CoC) Training” again or attempt to take the corresponding “**RBA Qualification Test**” directly (provided the Auditor has at least conducted one RBA VAP Initial/Renewal audit). Should the Auditor not pass the test, the Auditor will have to take the RBA Code Training. For cost and training dates, visit the RBA website.

There are categories of an “**RBA Qualification Test**”:

- a. Provisional Auditor – A test with multiple choice and short answer questions (two hours)
- b. Auditor – A test with short answer questions (two hours)
- c. Lead Auditor – A test with short answer questions (two hours) and a telephone interview (45 minutes) during the processing phase of application



7. Summary of Auditor Requirements

	Competencies	Experience	Training Requirements
Labor & Ethics			
Lead Auditor	<ul style="list-style-type: none"> General Auditing Competencies, as listed Lead Auditor Competencies, as listed Labor & Ethics Competencies, as listed 	<ul style="list-style-type: none"> Six years of experience or Combination of experience or education equaling six years And at least 25 Labor & Ethics audits Or a valid RBA IRCA Lead Auditor Certification 	<p>Initially: Prior to approval for any category, Auditors should attend and pass at least one of the RBA pre-approved RBA Code training courses as described in Section 6.</p> <p>24 months Renewal:</p> <ul style="list-style-type: none"> 24 CPD hours plus three RBA audits or Attend The RBA Code of Conduct (CoC) Training and pass the “RBA Qualification Test” or Pass the “RBA Qualification Test” if the auditor has conducted at least one VAP Initial / renewal Audit in the past 24 months
Auditor	<ul style="list-style-type: none"> General Auditing Competencies, as listed Labor & Ethics Competencies, as listed 	<ul style="list-style-type: none"> Four years of experience or Combination of experience or education equaling four years And at least 25 Labor & Ethics audits Or a valid RBA IRCA Auditor 	
Provisional Auditor		<ul style="list-style-type: none"> Two years of experience And at least 15 Labor & Ethics audits or Observe three RBA audits and be observed in three RBA audits by RBA Qualified or IRCA Certified Lead Auditor in the previous 24 months. Or a valid RBA IRCA Provisional Auditor Certification 	
EHS			
Lead Auditor	<ul style="list-style-type: none"> General Auditing Competencies, as listed Lead Auditor Competencies, as listed EHS Competencies, as listed 	<ul style="list-style-type: none"> Six years of experience or Combination of experience or education equaling six years And at least 25 EHS audits 	<p>Initially: Prior to approval for any category, Auditors should attend and pass at least one of the RBA pre-approved RBA Code training course as described in Section 6</p> <p>24 months Renewal:</p> <ul style="list-style-type: none"> 24 CPD hours plus three RBA audits or To attend the RBA Code Training Course and pass the test or to pass the RBA qualification test if the Auditor has conducted at least one VAP Initial/renewal Audit in the past 24 months
Auditor	<ul style="list-style-type: none"> General Auditing Competencies, as listed EHS Competencies, as listed 	<ul style="list-style-type: none"> Four years of experience or Combination of experience or education equaling four years And at least 25 EHS audits 	
Provisional Auditor		<ul style="list-style-type: none"> Two years of experience And at least 15 EHS audits Observe three RBA audits and be observed in three RBA audits by RBA-Qualified Lead Auditor in the previous 24 months. 	



	Competencies	Experience	Training Requirements
Forced Labor Auditors			
Lead Auditor	<ul style="list-style-type: none"> • General Auditing Competencies, as listed • Lead Auditor Competencies, as listed • Labor & Ethics Competencies, as listed 	<ul style="list-style-type: none"> • Six years of experience or • Combination of experience or education equaling six years • Currently an approved RBA Lead Auditor for Labor and Ethics • And at least 10 Forced Labor audits • Or a valid RBA IRCA Lead Auditor Certification 	<p>Initially: Prior to approval for any category, Auditors should attend and pass at the RBA Forced Labor Audit course as described in Section 6.</p> <p>24 months Renewal:</p> <ul style="list-style-type: none"> • 24 CPD hours plus three RBA Forced Labor audits or • Attend The RBA Forced Labor Audit Course and pass the “RBA Forced Labor Qualification Test” or • Pass the “RBA Forced Labor Qualification Test” if the auditor has conducted at least one Forced labor audit in the past 24 months
Auditor	<ul style="list-style-type: none"> • General Auditing Competencies, as listed • Labor & Ethics Competencies, as listed 	<ul style="list-style-type: none"> • Four years of experience or • Combination of experience or education equaling four years • Currently an approved RBA Auditor for Labor and Ethics • And at least 5 Forced Labor audits • Or a valid RBA IRCA Auditor Certification 	
Provisional Auditor		<ul style="list-style-type: none"> • Two years of experience • Currently an approved RBA Provisional Auditor for Labor and Ethics • And at least 2 Labor & Ethics audits or • Observe two RBA audits and be observed in two RBA audits by RBA Qualified or IRCA Certified Lead Auditor in the previous 24 months. • Or a valid RBA IRCA Provisional Auditor Certification 	



8. Currently Approved Auditors

For Auditors who are qualified beyond Jan. 1, 2017, their qualification will expire on the date stated in their RBA Qualification Certificate.

If an Auditor is "currently approved" to conduct RBA audits on Jan. 1, 2016, their approval continues until Jan. 1, 2017.

On that date, their approval is terminated unless the following is completed:

- Submit "**Auditor Qualification/CPD Log**" to demonstrate experience in participating in at least three RBA audits (initial or renewal; VAP/CMA/AMA/SVAP on Forced Labor) in the previous 24 months (NOTE: in certain circumstances in countries/locations in which few RBA audits are conducted, the RBA may reduce or remove this requirement or supplement by RBA closure audit or priority closure audit). Every closure/priority closure audit is counted as 0.5 of an initial/renewal audit.
- Collected 24 CPD hours (refer to Renewal and Continual Professional Development section).

Failure to complete those actions prior to Jan. 1, 2017 will result in removal from the RBA-Approved Auditor List. If the Auditor wishes to become approved after that time, the Auditor must go through the "new" Auditor process. Alternatively, auditors may be allowed to take the corresponding "**RBA Qualification Test**" if the Auditor has conducted at least one RBA VAP initial/renewal audit within the last 24 months. Special approval from the Appointed Agent/RBA staff may be granted on a case-by-case basis. Refer to Attachment 2 for further details on "The Auditor Qualification and RBA Qualification Testing Process."

9. Acceptability of Standards, Codes and Other Audit Criteria

No other certifications, training or qualifications can exempt an Auditor from these requirements except for proof of auditing skills.

10. Associated Costs

All associated costs, including costs for training and processing of application, are borne by the audit firms or auditors or RBA Member Company for internal auditors. Refer to the RBA website for training details on RBA Code Training and the RBA Qualification Test.

Processing fees are as follows and are nonrefundable:

- For a new application: USD \$50 per application for each discipline for Provisional Auditor and Auditor.
- For reclassifying or renewal: USD \$50 per application for each discipline for Provisional Auditor and Auditor.
- For new, renewal and reclassifying of Lead Auditor: USD \$100 per application for each discipline.



The “**RBA Qualification Test**” is USD \$100 per attempt and is nonrefundable. The “**RBA Qualification Test**” is administered by the RBA or its Appointed Agent.

The fee for the review of audit firm’s internal RBA CoC course is USD \$2000 per course and it is non-refundable.

11. The Approval Period

Unless otherwise terminated, approval is valid for 24 months from the date the Auditor successfully completed the RBA pre-approved RBA Code-related training course and passed the corresponding “**RBA Qualification Test**.”

Refer to Section 6, **Renewal and Continuous Professional Development** requirements for renewal of qualification status.

If an Auditor moves from one approved Audit Firm/RBA Member Company to another, their approval continues to be valid through the original approval period.

12. Re-Application by Terminated or Expired Auditors

Auditors who have had their approval terminated or expire may be able to reapply for approval, depending on the circumstances attributed to the termination.

Any re-approval includes going through the approval process and meeting the qualifications, including attendance at the RBA Code Training Course and passing the RBA Qualification Test.

- Auditors who have had approvals terminated due to confirmed ethical breaches will not be re- approved.
- Auditors who have had approvals terminated due to suspected, but not confirmed, Ethical Breach(s) may re-apply after 12 months. Approval, at that time, is at the sole discretion of the RBA/ Appointed Agent.
- Auditors who have had approvals terminated due to three or more egregious errors may re-apply after 12 months. Approval, at that time, is at the sole discretion of the RBA / Appointed Agent.
- Auditors who have had approvals terminated due to three or more complaints from the auditee may re-apply after 12 months. Approval, at that time, is at the sole discretion of the RBA / Appointed Agent.
- Auditors who have had approvals expire due to not completing the required actions (RBA audit experience and 24 CPD hours) in the required time but left in good standing with the RBA may reapply at any time.

13. How to Reclassify

The Auditor can apply for reclassification of approval status (move from "Provisional" to "Auditor," or "Auditor" to "Lead Auditor") at any time. If/when an Auditor or auditing company or RBA Member Company wants to reclassify the Auditor, they must complete the required application and pay the associated processing fee. If the auditor is in good standing, and if they



meet the requirements of the newly requested classification, they will be approved in their new classification.

Their approval, however, is good for only two years from their last pre-approved RBA Code-related training course or **RBA Qualification Test**. [NOTE: the approval is NOT valid from the time of reclassification, but is based on the training date/**RBA Qualification Test** date.]

14. Confidentiality

The Appointed Agent and the RBA consider all information, correspondence, and documentation submitted by the Auditor in support of the Auditor's certification activities strictly private and confidential.

The Appointed Agent and the RBA reserve the right to publish the names of the approved auditing firms and the approved Auditors (Lead Auditor, Auditor and Provisional). These names may be published so that member companies know which Auditors have been approved to conduct RBA audits.

The Appointed Agent and the RBA reserve the right to communicate to RBA Member Companies regarding Auditors and/or auditing companies who have had their approval terminated. In addition, the Appointed Agent and the RBA reserve the right to provide information to RBA Member Companies, the RBA and the RBA Board of Directors, regarding the performance of Auditors and audit firms.

15. Approval Termination

Both the Auditor and the Audit Firm may have their approval to conduct RBA audits terminated.

Auditor Termination

The auditor may no longer be approved to conduct RBA audits for the following reasons:

Confirmed Ethical Breach – acceptance of bribery, accepting gifts, unethical or dishonest audit scores, etc.:

- Approved Auditor status removal is effective immediately upon confirmation of ethics violation
- This decision is at the sole discretion of the Appointed Agent or the RBA
- Ethical breaches apply not only to ethical issues within the RBA program, but any ethical issues with any audit or auditee, or within any auditing scheme

Suspected, But Not Confirmed, Ethical Breach – Auditors that have a suspected, but not confirmed, ethical breach (acceptance of bribery, accepting gifts, unethical or dishonest audit scores, etc.) will be:

- Suspended from conducting audits during the investigation, unless otherwise permitted to do audits by the Appointed Agent or the RBA
- Suspended from conducting RBA audits for up to 12 months (to protect the RBA and RBA audit process) – Auditor must be re-approved as a new Auditor prior to conducting RBA audits



- Placed on probation for up to 24 months (probation means any other ethical breach, or suspected ethical breach, during this time may result in removal from the approved auditor list)
- NOTES:
 - ❖ The decision to consider any Auditor in "Suspected, But Not Confirmed, Ethical Breach" and the application of any or all of the above is at the sole discretion of the Appointed Agent and/or the RBA
 - ❖ Ethical breaches apply not only to the RBA program, but any ethical issues with any audit or auditee, or within any auditing scheme

Egregious Errors – large errors in the audit process, including, but not limited to, not completing portions of an audit, late audit submittal without communication, extremely unprofessional quality, etc.:

- First offense – warning to the Auditor
- Second offense – Auditor on probation for between 6-24 months (probation time applied at the discretion of the Appointed Agent or the RBA, based on factors related to the offenses)
- Third offense – if the third offense occurs while on probation, Auditor is removed from approved Auditor list
 - ❖ Auditor is no longer approved to conduct RBA audits
 - ❖ Auditor may request re-approval as a new Auditor after 12 months

Continual errors, late reporting, unprofessionalism, or other issues that are not addressed or corrected

The Appointed Agent reserves the right to suspend Auditors who continually make similar mistakes or otherwise do not implement corrections to the process as suggested by the Appointed Agent or the RBA.

Detrimental Actions – The Appointed Agent and the RBA have the sole discretion to terminate any Auditor for any reason at any time for actions, comments, attitudes or any other actions or factors that may be detrimental to the RBA audit program. Protection of the RBA's reputation and confidence in the program by member companies, Auditors, auditees, external stakeholders and others is the top priority in determining termination of any Auditor's approval to work within the RBA system.

Expired CPD hours – If the 24 CPD hours have not been completed by an Auditor within 12 months, approval to participate in RBA audits ends. However, Auditors have a two-month window after their approval ends to collect the 24 CPD hours. Failure to satisfy the 24 CPD hours results in termination of approval for conducting RBA audits.

Auditors may become re-approved to conduct RBA audits, but must be approved through the same process as a new Auditor.



Audit Firm Approval Termination

The audit firm's ability and approval to conduct an RBA audit may be terminated for the following reasons:

Confirmed Ethical Breach(es) within the firm – acceptance of bribery, accepting gifts, unethical or dishonest audit scores, etc.:

- For each ethical breach, or suspected ethical breach, the Audit Firm must demonstrate to the Appointed Agent or the RBA the measures taken to prevent future breaches, which may include increased or additional training, monitoring, oversight, or other such activities. This should be included in a Corrective Action Plan sent to the Appointed Agent or the RBA for review.
- If the audit firm does not demonstrate appropriate actions, their approval will be terminated.
- During the investigation and demonstration phases, the audit firm may be suspended from conducting RBA audits.
- NOTES:
 - ❖ These decisions are at the sole discretion of the Appointed Agent or the RBA
 - ❖ These breaches are not only restricted to RBA audits, they include any ethical issues with any audit type, or within any auditing scheme

Egregious Errors – systemic issues within the audit firm with egregious errors in the audit reports or audit process, or if the audit firm uses non-approved Auditors (or has too many Provisional Auditors) to conduct an RBA audit:

- The Audit Firm must demonstrate to the Appointed Agent or the RBA the measures taken to prevent future egregious errors, which may include increased or additional training, monitoring, oversight, or other such activities
- If the Audit Firm does not demonstrate appropriate actions, their approval will be terminated
- During the demonstration phases, the Audit Firm may be suspended from conducting RBA audits
- NOTE: These decisions are at the sole discretion of the Appointed Agent or the RBA

Continual errors, late reporting, unprofessionalism, or other issues that are not addressed or corrected – systemic issues with continual errors in the audit report in process:

- The Audit Firm must demonstrate to the Appointed Agent or the RBA the measures taken to prevent future errors, which may include increased or additional training, monitoring, oversight, or other such activities
- If the Audit Firm does not demonstrate appropriate actions, their approval will be terminated
- During the demonstration phases, the audit firm may be suspended from conducting RBA audits
- NOTE: These decisions and actions are at the sole discretion of the Appointed Agent or the RBA



Detrimental Actions – The Appointed Agent or the RBA has the sole discretion to terminate any Audit Firm for any reason at any time for actions, comments, attitudes or any other factor that may be detrimental to the RBA audit program. Protection of the RBA’s reputation and confidence in the program by member companies, Auditors, auditees, external stakeholders and others is the top priority in determining termination of an Audit Firm’s approval to work within the RBA system.

Attachment:

1. RBA Auditor Qualification/CPD Log
2. The Auditor Qualification Registration and RBA Qualification Testing Process



AUDIT QUALIFICATION / CPD LOG

Qualification	
Name of Applicant	
New Applicant (Yes / No)	
Reclassifying (Yes / No) Submit current certification	

Submit report reference for VAP audit and attach report for non-VAP audit.

#	Info. of Company Audited	Duration of Audit	Role in Audit	Audit Scope**
1	Auditee Name: Location (city, country): No. of employee: RBA VAP / S-VAP Audit report number:	Audit Start Date: Audit End Date: No. of audit hours in total:	<input type="checkbox"/> Auditor <input type="checkbox"/> Lead Auditor No. of team member:	Audit Standard if it is non-VAP audit: Audit Type (Initial/renewal/closure/Priority):
2	Add on more rows when required. The AUDIT QUALIFICATION / CPD LOG is available in word document.			

Continuous Professional Development (minimum of 24 hours for renewal of qualification)

#	Name of Event: Location (City, Country):	Event Start Date: Event End Date:	Role in the Event:	Total Hours Claimed:
1				
2	Add on more rows when required. The AUDIT QUALIFICATION / CPD LOG is available in word document.			

*SVAP Audit = RBA Supplemental VAP on Forced Labor audit

We/I hereby confirm that the Candidate has successfully conducted the audits and the CPD hours listed above.



Candidate's Signature:		Date:
Candidate's Supervisor: Name and Signature		Date:
Candidate's Employer: Name and Contact Details		

Following table is to be filled by RBA Staffer/Appointed Agent:

<p>Evaluation Done by :</p> <p>Date:</p> <p>Conclusion:</p> <p>Special Remarks:</p>
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Attachment 2: The Auditor Qualification Registration and RBA Qualification Testing Process

