![Responsible Business Alliance — Advancing Sustainability Globally]

RBA Audit Program (VAP)
COVID-19 Process Requirements

Revision 1.0 – March 2021

For more information about the Remote Validated Assessment Program (VAP), please contact:

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1. Table of Contents

2. Introduction

2.1 Background and Overview.

The world has changed; it is uncertain when we will be back to what we used to know as our normal living conditions. This type of extraordinary events is beyond the control of any of any organization, such as the global coronavirus emergency. This emergency situation has brought challenges to governments and society. Global production chains continue to operate under the new conditions, legal requirements continue to apply to organizations, and worker rights are to be respected more than ever under this challenging scenario.

RBA has the responsibility to uphold the credibility of the Validated Audit Program (VAP) by demonstrating appropriate due diligence and reasonable actions to mitigate program risk.

2.1.1 Due to   COVID-19 pandemic and continuing impacts around the world, in some regions VAP audits are unable to fully adhere to the VAP protocols and requirements defined in the VAP Operations Manual because of the long-term nature of COVID-19 and their lasting implications for audit programs this document defines and establishes the procedures acceptable alternative to a VAP audit

2.1.2 Through this document RBA recognizes specific, controlled, off-site VAP Audit activities in those cases where the requirements of the VAP Operations Manual cannot be fully applied.

2.1.3 The publication of this document "RBA Audit Program (VAP) COVID-19 Process Requirements" rescinds and replaces all previous COVID-19 notifications/Instructions.

2.1.4 This document defines the "minimum" requirements to complete a VAP audit. In most cases, (to satisfy the expectations of customers, members, buyers, and other interested parties) Audit firms will need to develop protocols and internal requirements exceeding those defined in this document.

2.2 Scope of Applicability

2.2.1 This document defines alternative procedures and protocols, minimum requirements, and guidance to be applied by audit firms to execute VAP audits globally, in *only* those situations where the short and long-term impacts of COVID-19 prevent full adherence to RBA's VAP Operations Manual. Including not only those situations where access to perform am "on-site" audit is not possible but also addressing those situations where management of COVID-19 related risks is needed

2.2.2 In such situations, and until document is amended or rescinded the protocols, requirements and guidance outlined herein may be applied to perform a VAP in lieu of those VAP Operations Manual requirements which would be high risk, or impossible to fulfill under the prevailing circumstances.

2.3 Definitions

2.3.1 **On-site auditor.** Refers specifically to a qualified auditor who has been certified and approved by RBA to perform on-site elements of hybrid VAP audits. An on-site auditor is typically a local auditor who is able to access the facility when travel restrictions prevent the lead auditor from conducting the audit. Prior to any assignment, the selected on-site auditor shall be Qualified per "RBA auditor guidebook
http://www.responsiblebusiness.org/media/docs/RBAAuditorGuidebook.pdf

2.3.2 **On-Site VAP Audit.** Audit conducted at factory/facility premises in accordance with VAP Operations Manual (Incorporating COVID-19 deviations authorized in Section 10. Appendix 2, as necessary)

2.3.3 **Alternative VAP audit.** An RBA Approved method for conducting controlled VAP audits that are alternative to "on-site" audits, three alternative methods are recognized as alternative to an on-site audit "Hybrid Audit", "Remote Audit", "Desktop Remote Audit."

2.3.4 **Hybrid VAP Audit.** Is a combination of: (a) audit management and remote audit activities conducted by an approved audit firm using real time electronic audio-visual link(s) to the auditee facility and (b) limited, specified, on-site audit activities directed remotely by the Lead Auditor conducted on-site at the facility premises by an on-site auditor (as defined in 3.1.1) (Refer to Section 5. Hybrid Audit Requirements below for process requirements)

2.3.5 **Remote VAP Audit.** Audit activities conducted remotely by an approved audit firm Lead Auditor using real-time electronic audio-visual link(s) to the auditee's facility. (Refer to section 6. Remote Audit Requirements below for process requirements)

2.3.6 **Desktop Remote Audit.** Audit activities conducted remotely by an approved audit firm Lead Auditor for audit questions specifically approved in VAP Operations Manual (Refer to section 7. Desktop Remote Audit Requirements below for process requirements)

3. COVID-19 Processes

3.1 Individual Audit Analysis and Decision Making.

Because an on-site audit provides the highest level of assurance this audit methodology remains mandatory for audit purposes whenever feasible. When is not possible or safe for a VAP audit team to access or travel to auditee premises RBA shall offer, where possible, an alternative audit in accordance with the requirements of this document.

3.1.1 For a client to validate their current performance level to the RBA Code of Conduct or need to maintain their audit schedule for customers and other stakeholders shall conduct audits (preferrable on-site audits) but alternatively hybrid audits and remote audits and follow-up reviews

3.1.2 RBA Audit Program Manager (APM) at least 5 weeks before the audit start date shall contact the auditee to determine whether a conventional audit is possible. If an on-site audit is not possible due to travel or access restrictions, the decision-making process shall be invoked (Figure 3.1-1 Initial Audit Decision Tree & Figure 3.1-2 Closure Audit Decision Tree)

3.1.3 If an audit is possible the APM will determine the audit type invoking one of the relevant process requirements as follows:

- On-site VAP audit (in accordance with VAP Operations Manual)
- Hybrid audit (in accordance with paragraph 2.3.4)
- Remote audit (in accordance with paragraph 2.3.5)
- Desktop Remote audit - for closure audits only where specifically defined as acceptable in the VAP operations Manual (in accordance with paragraph 2.3.6)

3.1.4 The auditee shall be informed of the outcome of the analysis and the arrangements for the audit shall start.

Figure 3.1-1 Initial Audit Decision Tree

Initial Audit Requested

RBA Remote Audit remain Valid ? — No → **RBA Performs an on-site audit**

↓ Yes

Travel Restriction into country / state or province of auditee — No → **Audit Team available locally or can travel ?** — Yes → **RBA Performs an on-site audit**

Yes ↓ (left path)

Audit Team available locally or can travel ? — No →

Was previous Initial audit an on-site audit ? — No → **APM Approval Needed**

↓ Yes

Realiable Data Connection available in the facility ? — No → **Audit Not Possible**

↓ Yes

Qualified Social Auditor available locally ? — Yes → **Can get access to the facility ?** — Yes → **RBA conducts a Hybrid Audit**

↓ No   No →

RBA conducts a Remote Audit

Figure 3.1-2 Closure Audit Decision Tree

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Closure Audit Requested → RBA Remote Audit remain Valid ? — No → RBA Performs an on-site audit

Yes ↓

Travel Restriction into country / state or province of auditee — No → Audit Team available locally or can travel ? — Yes → (RBA Performs an on-site audit)

Yes (left) / No ↓

Was previous Initial audit and **on-site** audit ? — No → APM Approval Needed

Audit Not Possible

Yes ↓

Realiable Data Connection available in the facility ? — No → Remote Desktop Verification Allowed — Yes → RBA conducts a Desktop Remote Audit

No → Audit Not Possible

Yes ↓

Qualified Social Auditor available locally ? — Yes → Can get access to the facility ? — Yes → RBA conducts a Hybrid Audit
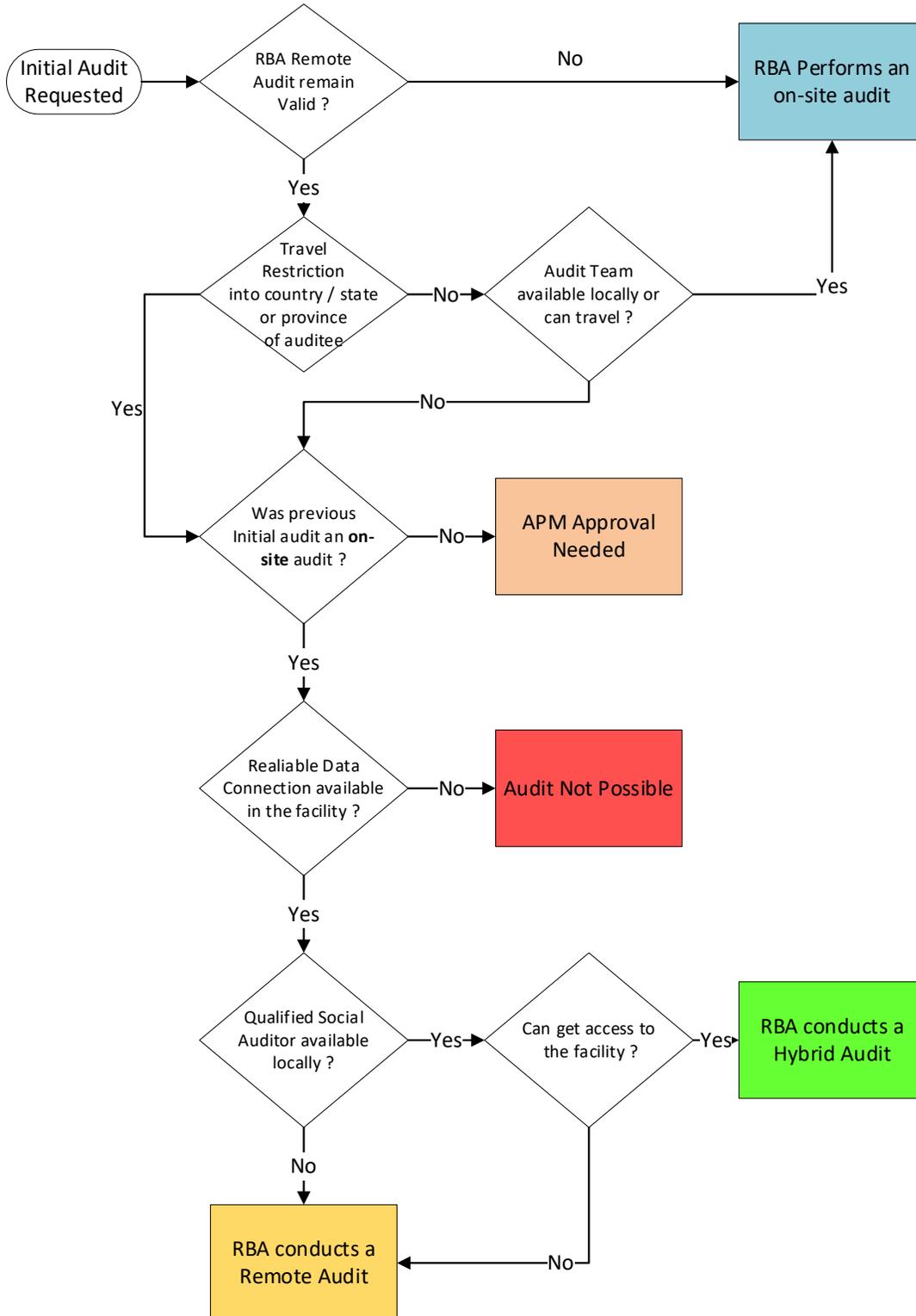
No ↓   No →

RBA conducts a Remote Audit
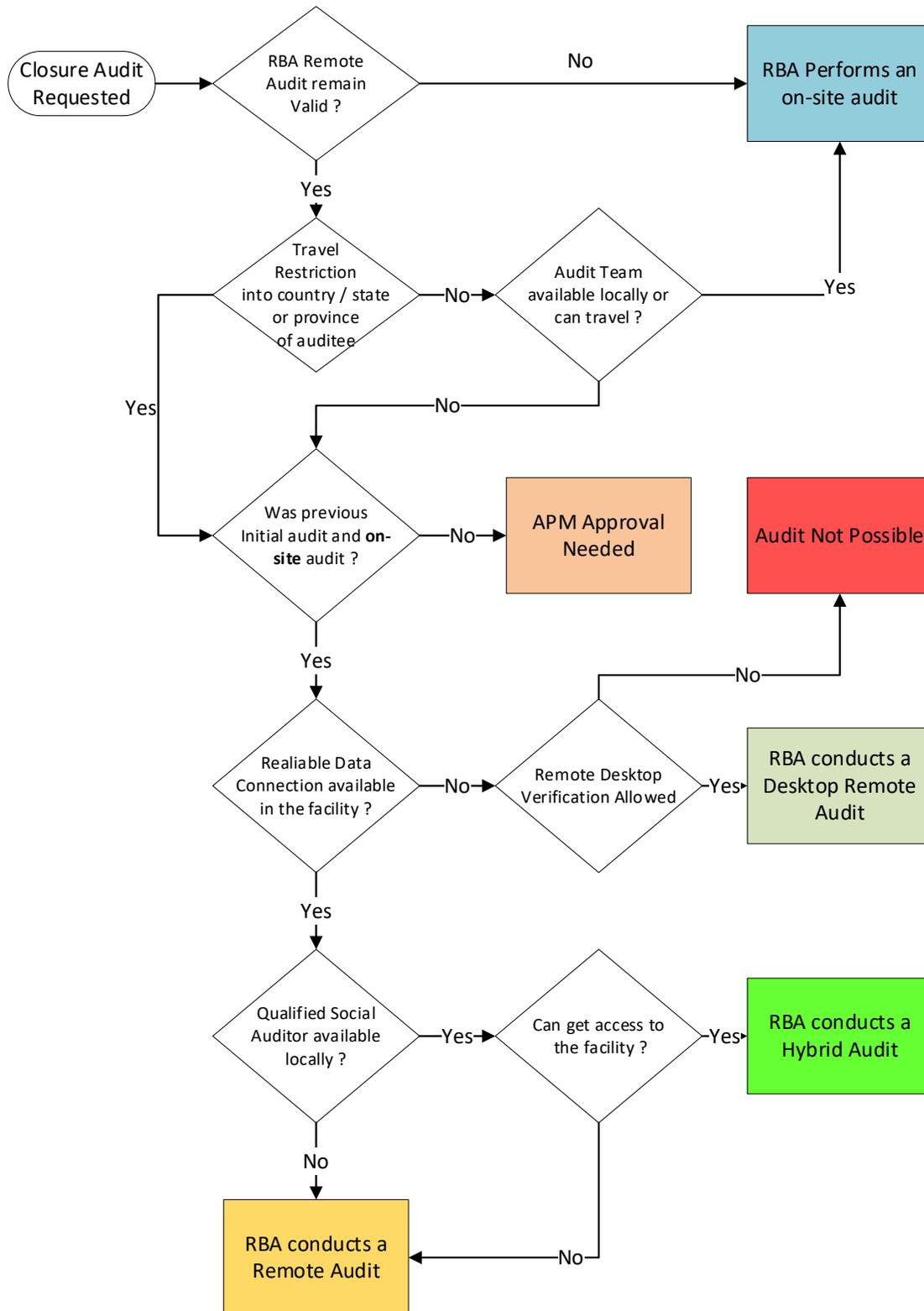
4. Alternative (COVID-19) Audit Requirements

4.1 General Requirements – On-site and alternative audits

4.1.1 RBA recognized 3 types of 'alternative audits' ("Hybrid", "Remote", "Remote Desktop") refer to definitions in section 2

4.1.2 Under all circumstances, regardless of audit type, audit firms and auditor shall:

- Adhere to RBA requirements / interpretations established in valid VAP Operations Manual

Table 4.1-1 Alternative audits – Criteria and Limitations for Use

VAP Audit Type (In order of preference)	Outline Audit Process	Justification Required	Limitations / Comments	Recognition (See section 9.)
On-site Audit	Qualified VAP team conducts all elements entirely on site	None required – preferred audit methodology	VAP valid for 2 years	Full recognition Valid for 2 years
Hybrid Audit	Qualified lead auditor conducts online and offline elements remotely in conjunction with a qualified auditor who conducts assigned on-site elements	Justify why on-site audit was not possible	During COVID-19 emergency may be a substitute for on-site audit	Full recognition Valid for 2 years
Remote Audit	VAP team conducts online and offline elements entirely remotely	Justify why neither on-site nor hybrid audit were not possible	Consecutive remote audits will require APM Approval	Limited recognition valid for 2 years
Desktop Remote Audit	Qualified Lead auditor conducts offline elements entirely remotely	Not needed if elements to be reviewed are approved in VAP Operations Manual	Consecutive desktop remote will require APM Approval	Full recognition Valid for 2 years

Table 4.1-2 Alternative Audits – Applicability

Audit Type	Risk Level	Assurance Level	Initial Audit	Closure Audit	Priority Closure
On-site Audit	Lowest	Highest	Y	Y	Y
Hybrid Audit	Moderate	High	Y	Y	N
Remote Audit	Moderate	Moderate	Y	Y	N
Desktop	Highest	Lowest	N	Y	N

Table 4.1-3 Alternative Audits – Communication Criteria

Alternative Audit Process – Communication Criteria			
Audit Requirements	**Responsibility - communication method**		
	Hybrid	Remote Audit	Desktop Review
Auditee engagement (after contracts signed)	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP
Scoping Questions	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP
Decision tree to define audit type	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP
Verification of Special permits by auditee	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP	RBA APM – email telephone, VoIP
Communication of audit plan in advance	Audit Firm – email	Audit Firm – email	Audit Firm – email
Pre-audit Technical verification	Audit Firm	Audit Firm	Audit Firm
Opening Meeting	VAP Audit team (remotely) On-site auditor, auditee management and worker reps* Via VoIP, screen sharing *relevant process owners subject to social distancing precautions	VAP Audit team (remotely) auditee management and worker reps Via VoIP, screen sharing	VAP Audit team (remotely) auditee management and worker reps Via telephone or replaced by VoIP
Site Map / Factory Layout	Audit Firm – Supplemented by VoIP. Screen sharing	Audit Firm – Supplemented by VoIP. Screen sharing	Audit Firm – telephone Supplemented by VoIP. (Screen sharing when possible)
Review of documented information	Audit firm. On-site auditor, screen sharing, VoIP, access to shared folder	Audit firm. screen sharing, VoIP, access to shared folder	Audit Firm – via document supplemented by VoIP. (Screen sharing when possible)

Management Interviews	Audit firm. On-site auditor, screen sharing, VoIP, access to shared folder	Audit Firm – Supplemented by VoIP. Screen sharing	Audit Firm – telephone, Supplemented by VoIP. (Screen sharing when possible)
Worker Interviews	On-site auditor	Audit Firm – (no conventional worker interviews) Supplemented by VoIP. Screen sharing (confidential)	Audit Firm – (no conventional worker interviews) Supplemented by VoIP. Screen sharing (confidential)
Facility Tour	Audit firm. On-site auditor, supplemented by live streaming, photographs	Auditee live streaming, and photographs in real time	Audit Firm Photographs, pre-recorded videos by auditee to be sent in advance
Preparation of Audit Finding Acknowledgment (AFA)	Audit firm. On-site auditor supplemented by screen sharing, VoIP	Audit Firm	Audit Firm
Closing Meeting	VAP Audit team (remotely) On-site auditor, auditee management and worker reps* Via VoIP, screen sharing *relevant process owners subject to social distancing precautions	VAP Audit team (remotely) auditee management and worker reps* Via VoIP, screen sharing *relevant process owners subject to social distancing precautions	VAP Audit team (remotely) auditee management and worker reps* Via telephone or replaced by VoIP

5. Hybrid Audit Requirements

5.1 Communication Requirements.

The principal hybrid communications requirement criteria are defined in Table 4.1.2-c

5.2 General Requirements for Hybrid Audits

5.2.1 In accordance with Section 3 Individual Audit Analysis and Decision Making diagrams (Figure 3.1-1 & Figure 3.1-2) a hybrid audit may be the best option for a factory to demonstrate compliance to RBA Code of Conduct when travel restrictions and/or access to the auditee facility prevents an on-site audit

5.2.2 Hybrid audits shall be performed in accordance with RBA VAP Operations Manual

5.2.3 Hybrid audits shall be performed by a VAP Certified lead auditor with support from an on-site auditor.

5.2.4 The assigned audit firm performs all planning and preparation for the audit, including review of system documentation, review of technical requirements needed for the audit

5.2.5 During the audit, the On-site auditor (see definition in 2.1.1) performs audit tasks under the direction of the lead-auditor in accordance with the prescribed audit plan and as directed.

5.2.6 If the on-site auditor during a hybrid audit is present at the facility the remote audit will support the audit as needed in accordance with the prescribed audit plan

5.2.7 In order to facilitate remote opening/closing meetings, conduct worker and management interviews the remote auditor connects electronically to remotely manage and perform elements of the audit in real time-time through an online meeting or web conferencing platform.

5.2.8 The On-site auditor executes the facility tour, review working conditions, access records and performs other on-site activities remaining connected via real-time live streaming as directed by the lead auditor.

5.2.9 In hybrid audits worker interviews are not streamed via VoIP to protect worker confidentiality

5.3 Planning and Scheduling of Hybrid audits

5.3.1 RBA reserves the right to disqualify an audit firm for conducting hybrid audits if their performance is below RBA expectations.

5.3.2 Preparation for a hybrid audit requires significant preliminary effort to establish and confirm reliable data/broadband connection (to allow real-time video streaming and screen sharing) as well as arranging for on-site auditor to conduct on-site activities.

5.3.3 Audit firm should start preparation for the audit depending on the type of audit, initial or closure in accordance with VAP Ops Manual requirements

5.3.4 The audit firm may request the auditee to provide access to soft copies of documentation required for audit preparation. Due to data privacy concerns any documentation exchange previous to the audit should be done through the RBA-Online platform in the discussion tab.

5.3.5 The audit firm conducting the hybrid audit shall detail how to perform the review of information that cannot be shared remotely (due to confidentiality or access issues)

5.3.6 If, at any time, the auditee fails to cooperate in accordance with the required process the highest rating should be assigned for "denied access". The audit firm shall notify the APM Immediately.

5.4 Selection of remote technology for hybrid audits

5.4.1 VoIP and technology planning should include.

- Determine the platform to be used for video streaming and screen sharing for hosting the audit, to be agreed upon between the auditee and the audit firm.
- Test platform compatibility between the auditor and the auditee (also to shadow auditor if necessary or audit observer) prior to the audit.
- Encourage and consider the used of tablets, cameras, virtual reality googles or any other electronic device to be used for conducting the site tour when physical evaluation of a site of facility is necessary to determine compliance to the RBA code of Conduct per the VAP Operations Manual.
- Broadband speed should be sufficient for audit firm to perform the reviews and interviews with enough virtual resolution and sound quality.
- Per the decision tree in Figure 3.1-1 and Figure 3.1-2 If technical requirements are not met per audit firm criteria the audit will not be possible and will be rescheduled or cancelled.[1]

5.5 Performing Hybrid Audits

5.5.1 On the agreed audit date, the on-site auditor and remote auditor shall conduct the audit, per agreed audit scope and in accordance with the requirements of the VAP Operations Manual

5.5.2 Using the site-layout and connected to the remote auditor via live video-stream, the On-site auditor shall perform the site tour of the facility following the directions of the lead auditor. The lead auditor may instruct the on-site auditor to visit specific areas to in see in real-time through video streaming.

5.5.3 Management interviews shall be held on-site or through VoIP.

5.5.4 Worker interviews should be conducted by the on-site auditor and provide the results confidentially to the lead auditor.

5.5.5 Documentation may be reviewed by the remote auditor through electronic means to remotely manage and perform elements of the audit in real time-time through an online meeting or web conferencing platform.

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[1] Web conferencing platforms such as Microsoft teams/Skype/Webex/Zoom with screen sharing enabled are suitable for a hybrid audit. The same platform or an alternative real-time electronic streaming device such as GoPro Camera, Virtual googles, Cell phone or tablet video camera are suitable for providing real-time video linkage. Electronic media must be pre-selected, agreed between auditee and audit firm for adequate performance during audit preparation.

5.5.6   If a document or specific item is not able to review complete a determination should be made, and this has to be communicated in the audit report.

5.5.7   Auditee and auditor should make their best effort to confirm what was communicated. Reviewed through the audit.

5.5.8   Audit procedures per VAP Operation Manual should be followed (Opening meeting, daily wrap-up meetings, closing meeting)

5.5.9   The auditor may finish the audit at anytime due to an inability to maintain satisfactory connections or conditions during the scheduled time.

6. Remote Audit Requirements

6.1 Communication Requirements.

The remote audit communications requirement criteria are defined in Table 4.1.2-c

6.2 General Requirements for Remote Audits

6.2.1   In accordance with Section 3 Individual Audit Analysis and Decision Making diagrams (Figure 3.1-1 & Figure 3.1-2) a Remote audit may be the best option for a factory to demonstrate compliance to RBA Code of Conduct when travel restrictions and/or access to the auditee facility prevents an on-site audit

6.2.2   Remote audits shall be performed in accordance with RBA VAP Operations Manual

6.2.3   Remote audits shall be performed by a VAP Certified audit team.

6.2.4   The assigned audit firm performs off-site all planning and preparation for the audit, including coordination and execution, review of system documentation and review of technical requirements needed for the audit.

6.2.5   A remote audit may consist of 2 elements.

   a) An off-site review of documents and records previously requested to the auditee in accordance with the required document list available in VAP Operations Manual (Due to data privacy concerns any documentation exchange previous to the audit should be done through the RBA-Online platform in the discussion tab)

   b) Real time review of system documents and records. This is achieved by interacting with auditee's representatives using an online meeting or web conferencing platform.[2]

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[2] Web conferencing platforms such as Microsoft teams/Skype/Webex/Zoom with screen sharing enabled are suitable for a remote audit. The same platform or an alternative real-time electronic streaming device such as GoPro Camera, Virtual googles, Cell phone or tablet video camera are suitable for providing real-time video linkage. Electronic media must be pre-selected, agreed between auditee and audit firm for adequate performance during audit preparation.

6.3 Planning and Scheduling of Remote audits

6.3.1 RBA reserves the right to disqualify an audit firm for conducting remote audits if their performance is below RBA expectations.

6.3.2 Preparation for a remote audit requires significant preliminary effort to establish and confirm reliable data/broadband connection (to allow real-time video streaming and screen sharing)

6.3.3 Audit firm should start preparation for the audit depending on the type of audit, initial or closure in accordance with VAP Ops Manual requirements

6.3.4 The audit firm may request the auditee to provide access to soft copies of documentation required for audit preparation. Due to data privacy concerns any documentation exchange previous to the audit should be done through the RBA-Online platform in the discussion tab.

6.3.5 The audit firm conducting the remote audit shall detail how to perform the review of information that cannot be shared remotely (due to confidentiality or access issues)

6.3.6 If, at any time, the auditee fails to cooperate in accordance with the required process the highest rating should be assigned for "denied access". The audit firm shall notify the APM Immediately.

6.4 Selection of technology for remote audits

6.4.1 VoIP and technology planning should include.
- Determine the platform to be used for video streaming and screen sharing for hosting the audit, to be agreed upon between the auditee and the audit firm.
- Test platform compatibility between the auditor and the auditee (also to shadow auditor if necessary or audit observer) prior to the audit.
- Encourage and consider the used of tablets, cameras, virtual reality googles or any other electronic device to be used for conducting the site tour when physical evaluation of a site of facility is necessary to determine compliance to the RBA code of Conduct per the VAP Operations Manual.
- Broadband speed should be sufficient for audit firm to perform the reviews and interviews with enough virtual resolution and sound quality.
- Per the decision tree in Figure 3.1-1 and Figure 3.1-2 If technical requirements are not met per audit firm criteria the audit will not be possible and will be rescheduled or cancelled.[3]

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[3] Web conferencing platforms such as Microsoft teams/Skype/Webex/Zoom with screen sharing enabled are suitable for a hybrid audit. The same platform or an alternative real-time electronic streaming device such as GoPro Camera, Virtual googles, Cell phone or tablet video camera are suitable for providing real-time video linkage. Electronic media must be pre-selected, agreed between auditee and audit firm for adequate performance during audit preparation.

6.5 Performing Remote Audits

6.5.1   On the agreed audit date, the remote audit team shall perform the audit, per agreed audit scope and in accordance with the requirements of the VAP Operations Manual

6.5.2   Management and worker interviews shall be held through the chosen VoIP tool.

6.5.3   Using the site-layout and connected to a previously selected device via live video-stream, the designated auditee representative shall perform the site tour of the facility following the directions of the lead auditor. The lead auditor may instruct the auditee representative to visit specific areas to in see in real-time through video streaming.

6.5.4   Documentation is reviewed by the remote audit team through electronic means to remotely manage and perform elements of the audit in real time-time through an online meeting or web conferencing platform.

6.5.5   If a document or specific item is not able to review complete a determination should be made, and this has to be communicated in the audit report.

6.5.6   Audit procedures per VAP Operation Manual should be followed (wrap-up meetings)

6.5.7   The auditor may finish the audit at anytime due to an inability to maintain satisfactory connections or conditions during the scheduled time for the audit.

6.5.8   Audit team and auditee shall take appropriate measurements to safeguard confidentiality or data in any format, as agreed during audit preparation.

7. Desktop Remote Audit Requirements

7.1 Communication Requirements.

The desktop remote audit communications requirement criteria are defined in Table 4.1.2-c

7.2 General Requirements for Desktop Remote Audits

7.2.1   In accordance with Section 3 Individual Audit Analysis and Decision Making diagrams (Figure 3.1-1 & Figure 3.1-2) a Desktop Remote audit may be the best option for a factory to demonstrate compliance to RBA Code of Conduct

7.2.2   Desktop remote audits are approved only for VAP closure audits and for specific questions of the audit as established in the VAP Operations Manual

7.2.3   Desktop Remote audits shall be performed by a VAP Certified auditor

7.2.4 The assigned audit firm performs off-site all planning and preparation for the audit, including coordination and execution, performance of the remote audit is responsibility of the assigned auditor working off-site.

7.2.5 A desktop remote audit consists of the following elements:

7.2.6 Requesting documents and records from the auditee prior to the audit date

7.2.7 Review of documents and records against established audit criteria in the VAP operations Manual

7.2.8 Request of further documents/evidence as necessary

7.2.9 If triangulation is required shall be performed through phone interview or as considered appropriate by assigned the audit firm

8. COVID-19 General Considerations

8.1 Safety Considerations

Safety of the audit team for on-site and hybrid audits and involved personnel from the auditee is a priority at this time.

Audit firms should consider local and national government health policies for audit planning purposes. Audit teams should not be forced to travel unwillingly under any circumstance.

Social distancing and other measures should be observed at auditee's premises the following outlines the minimum expectations additional controls should be implemented as determined by the audit firm risk assessment or as stated by law.

8.2 Audit Planning.

8.2.1 During the audit planning process, the audit firm should communicate (to auditors and auditee personnel) audit specific risks and required risk-mitigation controls, national and local COVID-19 legal requirements should be considered.

8.2.2 Audit firm to inform auditee the actions to be taken by the on-site audit team to protect personnel involved in the audit as well as employees and sub-contractors.

8.2.3 Audit firm shall observe auditee policies and processes related to COVID-19

8.2.4 Audit firm shall provide audit team suitable equipment as follows and as required by law[4]

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[4] RBA will cover the expenses of the equipment to be provided to the audit team (Non-contact thermometers, disposable face masks, disposable gloves, closed bins for hygienical disposal)

8.3 Arrival on-site

8.3.1 Perform on-site temperature check for all members of the audit team

8.3.2 Disposable masks and gloves will be worn by all members of on-site audit team

8.3.3 Social distance shall be observed in all environments, 2 meters minimum recommended (six feet.) or local/legal guidance

8.4 Opening Meeting.

The following practices outlines the minimum expectations, additional controls should be considered and added as determined by the assigned audit firm's risk assessment or as stated by law.

8.4.1 Attendance should be limited to the minimum, ensuring that both management and workers are represented

8.4.2 Observe social distancing
- Minimize the duration of gatherings with a larger group.

8.4.3 During the opening meeting, the audit team and auditee personnel should discuss and agree the importance of observing COVID-19 control throughout the on-site audit process
   o Site Tour
   o Interviews (management / workers)
   o Meals
   o Daily wrap up and closing meeting

8.4.4 RBA COVID-19 checklist in Appendix 1 shall be signed by both parties. This form should be uploaded to the discussion tab on RBA Online by the audit firm.

8.5 Audit Process

8.5.1 Auditors should ensure that they and auditee representatives, adhere to al agreed controls.

8.5.2 Social distancing

8.5.3 Personnel protection equipment, face mask as a minimum, for all face-to-face interactions during the audit

8.5.4 Auditors should use disposable gloves when handling equipment or documents

8.5.5 If pens/pencil is required, one should be given to each interviewee. Pens/pencils should not be shared by workers.

8.5.6 Auditors should avoid entering busy areas such as canteens or dormitories only if keeping social distancing is impractical.

8.5.7 Meetings/interviews to be conducted in rooms without recirculated air conditioning and limited to no more than 4 persons at a time

8.5.8 The place for interviews should be in good ventilation. Avoid confined space.

8.6 Closing Meeting

8.6.1 For closing meeting attendance should be limited to the minimum, ensuring that both management and workers are represented

8.6.2 Observe social distancing

8.6.3 Minimize the duration of gatherings with a larger group.

When conducting audits of any type (conventional or alternative) VAP auditors shall consider the impacts of COVID-19 virus with respect to the protection and wellbeing of workers and other personnel at the facility

9. Audit Recognition

The RBA VAP Recognition program aims to drive continuous improvement by recognizing a factory's commitment to social and environmental responsibility.

9.1 Eligibility.

9.1.1 Only Full VAP audits are eligible for recognition, other audit types as Customer Managed Audits (CMA) and Auditee Managed Audits (AMA) are not eligible see Table 9.1-1 Eligibility Criteria by audit type

9.1.2 For the VAP or a recognized alternative VAP protocol to be recognized it must close all the findings and submit a Corrective Action Plan (CAP) in RBA Online and must have a VAP closure audit. See recognition level and specific requirements in Table 9.2-1 Recognition levels by audit protocol and Table 9.2-2 Recognition Requirements below

Table 9.1-1 Eligibility Criteria by audit type

VAP Recognition by audit type	
Audit Type	Eligible
VAP (Manufacturing site)	**Y**
VAP (Services)	N
VAP (Small & Medium)	N
VAP–90	N
VAP Closed with exception	N
RBA Investigation	N
SVAP (Forced Labor VAP)	N
Customer Managed Audit (CMA)	N
Auditee Managed Audit (AMA)	N

9.2 Recognition levels

RBA offers 4 levels of recognition: Platinum, gold, silver, and bronze. Specific requirements by audit protocol are defined below

Table 9.2-1 Recognition levels by audit protocol

Recognition levels by audit protocol						
VAP Protocol	Eligible	Platinum	Gold	Silver	Remote Recognition	Expiration (after final audit date)
Full VAP (Manufacturing)	Y	Y	Y	Y	NA	2 years
Hybrid VAP	Y	Y	Y	Y	NA	2 years
Remote VAP (note 1)	Y	NA	NA	NA	Y	2 years
Desktop Remote Audit (note 2)	Y	Y	Y	Y	NA	2 years
VAP Closed with exceptions	N	NA	NA	NA	NA	NA

Note 1. Recognition will be labeled as "Remote VAP Recognition"

Note 2. Recognition for Remote Desktop Audit valid only for closure audits

Table 9.2-2 Recognition Requirements

Recognition Minimum Requirements				
Audit Type	Platinum	Gold	Silver	Remote Recognition
Initial Audit	1) Minimum Score 200	1) Minimum Score 180 2) No Priority or major findings reported	1) Minimum Score 160 2) No Priority findings reported	1) minimum Score 160 2) No Priority findings reported
Priority or Closure Audit	1) Minimum Score 200 2) Submit a CAP in RBA online 3) Must have a VAP closure Audit 4) Must close all findings*	1) Minimum Score 180** 2) Submit a CAP in RBA online 3) Must have a VAP closure Audit 4) Must close Priority and Major findings*	1) Minimum Score 160** 2) Submit a CAP in RBA online 3) Must have VAP Priority Closure Audit 4) Must close Priority findings*	1) Minimum Score 160** 2) Submit a CAP in RBA online 3) Must have VAP Priority Closure Audit must close priority findings*

10. Appendix 1 COVID-19 checklist

In an effort to protect auditors and workers at audit sites, the RBA requires the following checklist to be reviewed on the pre-audit phone call between the auditors and the auditees. The document must be signed at the opening meeting and uploaded into RBA-Online as an attachment for the audit.

Auditor preparedness
o Auditors are to take their own temperature two hours before the start of the audit to confirm there is no fever. The RBA uses the common measurement of a fever. If an auditor has a temperature equal to or higher than 100.4 degrees Fahrenheit or 38 degrees Celsius (or local guidance), they should not go on-site to conduct the audit. Call the APM and notify them of the situation.
o Auditors will perform temperature checks at the opening meeting to verify for the auditee that that audit team does not have a fever.
o Auditors will confirm to the auditee that they will bring disposable facemasks (along with closed bins for hygienically disposing of them).
o Auditors will confirm to the auditee that they will bring adequate disposable gloves for the audit team.

Auditee preparedness
o The auditee must confirm whether they have workers on site with active cases of COVID-19 and how they are following appropriate quarantine protocols as defined by the World Health Organization (WHO).
o The auditee must explain how they will participate in the audit while maintaining social distancing; during the opening meeting, site tour, worker interviews, closing meeting and any other relevant time in the audit process including meals.
o The auditee must explain how they have trained workers to maintain safety, for themselves and others on-site, related to COVID-19.
o The auditee mush explain how they handle workers who become ill while on-site including access to medical care.
o The auditee must provide hand sanitizer for auditors outside of dormitories and canteens.

Signatures

_____   _____

   Lead Auditor/Date   Site Lead/Date

*This form, including signatures, must be loaded into RBA Online as an attachment to the audit

11. Appendix 2 COVID-19 Approved exemptions

This appendix contains approved deviations from VAP Operations Manual requirements under exceptional situations, current COVID-19 emergency is considered an exceptional situation

VAP Section	Element	COVID-19 Revision	COVID-19 Exemption	Rationale	Last Revision	Conditions needed to obtain exemption
A3.1, A3.2	Working Hours	Modified as follows until further notice:	Under temporary exceptional circumstances workers may manage >60 but <72 hours per week, and/or continuous working days >6 days but <12 days	The RBA allows for certain exemptions to working hours requirements in the case of emergency or other unusual situations; COVID-19 is considered an emergency situation.	March 19th, 2020	1) Facility must recognize COVID-19 as an emergency situation 2) Have a documented plan to recover from the emergency situation and bring working hours back into conformance 3) The facility should comply with applicable laws, collective bargain agreements (where applicable) for the location where the factory operates (Country, state, or province)
B2.5 and B2.7	Emergency Preparedness	Modified as follows until further notice:	Under temporary exceptional circumstances emergency drills can be substituted by alternative ways to prevent the risk of infection where VAP Ops Manual requirements cannot be applied in full.	Contingency alternatives where VAP Operation Manual requirements cannot be applied in full.	February 19th, 2020	Under temporary exceptional circumstances emergency drills can be substituted by alternative ways to prevent the risk of infection where VAP Ops Manual requirements cannot be applied in full. - Due to COVID-19 prevalence RBA is approving an exemption to B2.5 and B7.2 requirements as follows:

						1. If there is no waiver to legal requirements Emergency evacuation drills can be conducted in an alternate way (e.g., in small batches of workers) when physical distancing requirements remain in force for the area where your facility is located. All drills shall require social distancing and proper respiratory hygiene and be performed in a manner that facilitates this requirement **2. If there is a waiver in place for legal requirements** If there a waiver in place the facility should document this and have the legal support available, it is expected that workers receive training on emergency procedures in absence of emergency drills. • An in-person training session should review the Facility emergency procedures including elements of the emergency plan that may have changed as facility conditions have changed in response to COVID-19 • Training should include all employees, including temporary employees • Training should review what is expected for fire drills, key features of fire protection in the facility and how they work

						• Staff should be instructed of current duties, emergency procedures and protection devices in their assigned areas • Training can include additional drills for emergency preparedness like severe weather **Guidance for auditors**: Based on above the auditor should review that the site has conducted a risk assessment for COVID-19 and that all code requirements are observed per B2.5 Emergency situations and B7.2 Dormitories, bathrooms, employee spaces are clean, safe, and well-maintained and meet international housing standards. If there is a waiver in place and NO Training has been provided to workers should be rated as "Risk of Non-compliance"

12. Document Control

Title:	RBA Audit Program – COVID 19 Process Requirements	Version: 1	Effective Date: March 1st 2021
Summary of changes	Initial Release		

13. References

SAAS COVID-19 Alternative Process Requirements for the SA8000 Program
Social Accountability International, P. Scott, June 2020