Appendix 9 – Remote Audit Protocol

REMOTE AUDIT PROTOCOL

1.   PURPOSE

The purpose of this Remote Audit Protocol is to:

- expand the RJC suite of remote audit elements[1] to be used as regular assessment tools by RJC certification bodies when assessing members' conformity with the RJC Code of Practices (COP), RJC Lab-Grown Materials Standard (LGMS) and RJC Chain of Custody (COC).

- retain some remote audit solutions first introduced by the RJC Remote Audit Derogation,[2] for exceptional circumstances amounting to force majeure.

- specify the conditions (eligibility) under which the above remote elements can be used and the methodology for their effective implementation.

- detail the requirements and methodology for certification bodies to follow to ensure that remote audits are conducted in a controlled, consistent and credible manner across all the certification bodies.

2.   SCOPE

This protocol applies to all RJC audit types where a member and its entities/facilities meet the relevant eligibility criteria outlined in Section 6.

3.   RESPONSIBILITY

RJC Programme Managers at certification bodies, RJC auditors and any other certification body personnel involved directly and indirectly in RJC remote audit activities are responsible for the implementation of, and conformity with, this protocol.

4.   DEFINITIONS

'**Audit types**' refers to all the mandatory and special audits allowed under the RJC standards, e.g. recertification, surveillance, expansion to scope, etc.

Eligibility criteria analysis: collection and assessment of member and entity/facility information by certification bodies to evaluate remote audit capability and eligibility against RJC criteria (risk analysis).

ICT (information and communication technology): any software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence and other such technologies used by members and auditors, that allow for live video-streaming. ICT shall have end-to-end encryption and comply with all applicable data governance legislation and confidentiality agreements. The use of ICT may be appropriate for auditing both locally and remotely to access member documentation, records and processes.

'**Remote audit**' is the umbrella term used by the RJC to define an audit where the auditor is not physically present at the member's entity/facility. The remote audit **format** may be either a 'fully remote audit' or a 'partially remote audit'. Both formats of remote audit cover the same scope and process as an on-site audit, with the only difference being a change in format.

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1   Remote audits as regular assessment tools have been limited to RJC Code of Practices (COP) mid-term desktop reviews (Assessment Manual, version 1.3 December 2020, Section 12.3.5, Table 14, p. 62).

2   An RJC Remote Audit Derogation was issued in 2021 outlining the criteria for RJC auditors to conduct remote audits under exceptional circumstances, namely the COVID-19 pandemic, which impacted their ability to conduct on-site audits against the RJC standards.

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A **fully remote audit** is an audit conducted **entirely through ICT means** and can be one of the following, depending on the scope and assessment activities of the audit:

a) A **desktop remote audit** is a static audit that is carried out remotely via real-time video-conferencing to assess a member's compliance. This fully remote audit is only applicable to an audit of restricted scope where a fixed member location is involved, with no data points from worker interviews or site tours required to assess compliance.

b) A **desktop and mobile remote audit** is both a static and mobile audit. In addition to point a), the auditor remotely guides the member through its site(s), dictating specific elements to be shown or demonstrated that relate to assessment of compliance, by using a mobile device. Worker interviews and site tours are considered an assessment activity belonging to the desktop and mobile remote audit.

A **partially remote audit** (also known as a hybrid, facilitated or semi-remote audit) is an audit that is conducted using a combination of on-site and remote mechanisms to assess compliance. Partially remote audits are split into two or more parts, whereby the remote elements and on-site elements are assessed separately.

A **facilitator** is a local employee or contractor of the certification body who is not an RJC lead auditor (but may be in training or have other auditing qualifications) and who supports and is directed by the remote RJC lead auditor/audit team as their eyes and ears on the ground during a remote audit.[3] During the partially remote audit, RJC remote lead auditors can direct a local facilitator to help them verify practices on the ground, if the certification body does not have an RJC local auditor. A full description of the role and qualifications of facilitators is available in the methodology section below.

5. PROCEDURE

The RJC adopts a scenario-driven approach to remote auditing, defined as a combination of prescriptive audit types and formats and member risk factors.[4] When considering the use of remote audit elements, certification bodies shall:

a) Conduct an eligibility criteria analysis to determine whether the member entity/facility is eligible and for which type and format of remote audit, by completing the applicable questionnaires, included below. For multi-site members, entities/facilities shall be grouped per remote audit format and the applicable questionnaire(s) shall be completed by the lead auditor/competent personnel to establish eligibility (one questionnaire per remote audit format for the grouped entities/facilities).

b) For combined audits, ensure that all schemes covered allow for a remote audit.

c) Record the remote audit in the RJC Auditor Portal and include the completed eligibility analysis questionnaire(s), at least five days before the audit takes place.

d) In addition to the above, for remote audit elements used due to force majeure only, request and obtain RJC approval prior to conducting the audit.

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3   ISEAL Alliance, Guidance – Remote Auditing Good Practices, v0.1 March 2021 p. 11, https://www.isealalliance.org/sites/default/files/resource/2021-03/Remote%20Auditing%20Good%20Practices%20ISEAL%20Guidance%20v0.1%20March%202021.pdf

4   ISEAL Alliance, Guidance – Remote Auditing Good Practices, v0.1 March 2021 p. 5, https://www.isealalliance.org/sites/default/files/resource/2021-03/Remote%20Auditing%20Good%20Practices%20ISEAL%20Guidance%20v0.1%20March%202021.pdf

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When remote audit elements are used as regular assessment tools, RJC approval shall not be needed prior to audit. However, the RJC reserves the right to sample and review these digital records at any time as part of the ongoing quality checks. If a remote audit is assessed as having been conducted in contravention of the relevant eligibility criteria, or a remote audit request has not been documented ahead of the audit, the RJC may require the certification body, directly or via the oversight provider/accreditation body, to implement additional safeguards (e.g. additional on-site audit to fully verify conformity) at the certification body's expense, or reject the audit report completely. Where this protocol is systemically not followed by a certification body, the RJC may reinstate RJC approval before a remote audit is carried out or no longer allow the certification body to conduct remote audits.

Exceptions to the eligibility criteria in sections 6A and 6B below (remote audit as regular assessment tool) shall not be considered by the RJC. Any exceptions to the eligibility criteria in Section 6C below (force majeure) shall be considered by the RJC on a case-by-case basis, with a documented justification before the audit is conducted, demonstrating how the deviation does not affect the auditors' ability to fully assess conformity and does not jeopardise the credibility of the certification. The RJC shall respond within five working days (Monday–Friday).
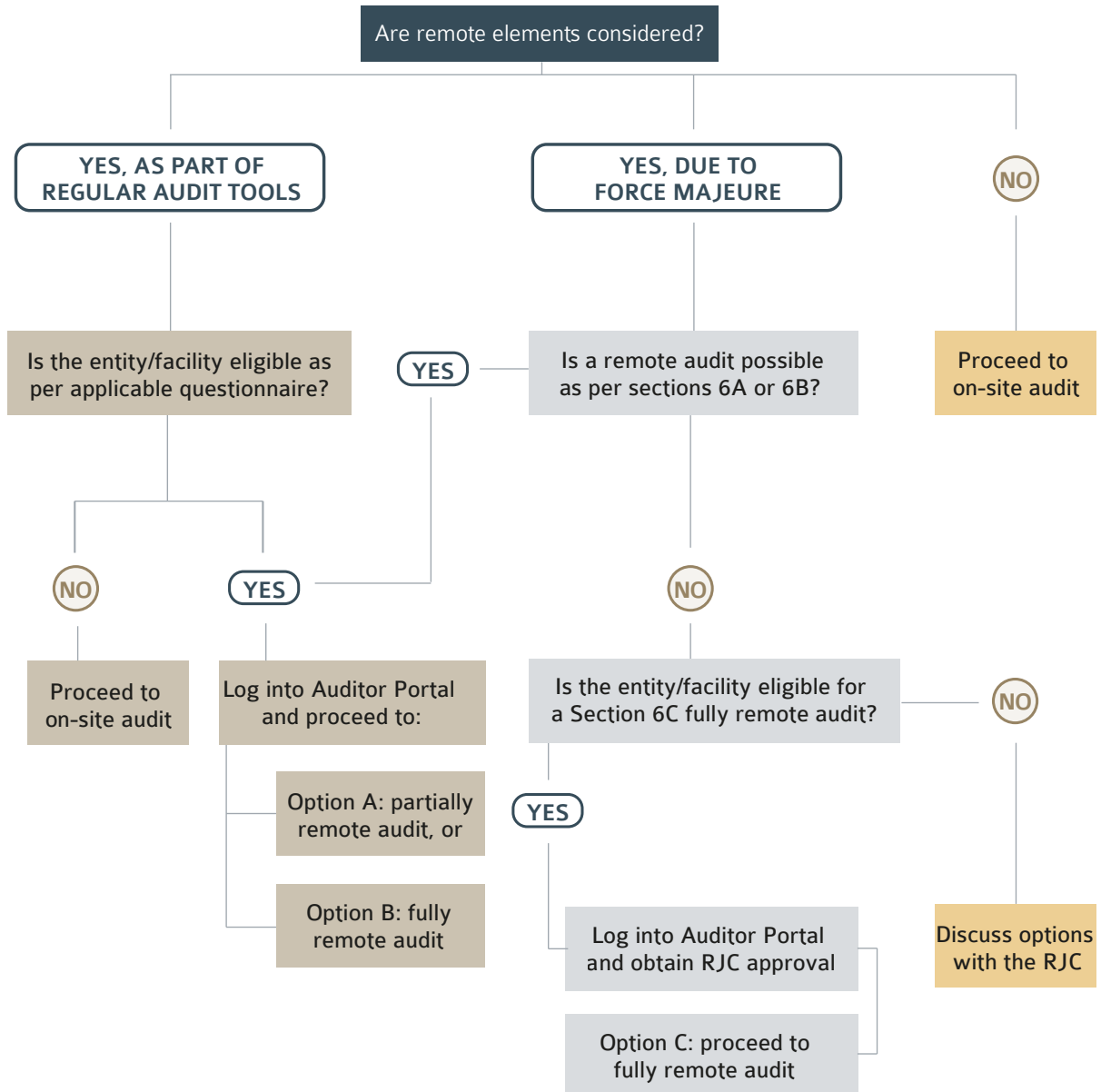
Where the RJC rejects a remote audit requested under Section 6C, the rationale for that decision shall be provided in writing at the same time. Retrospective requests under Section 6C (during and after the audit) shall not be authorised and the audit report shall be rejected.
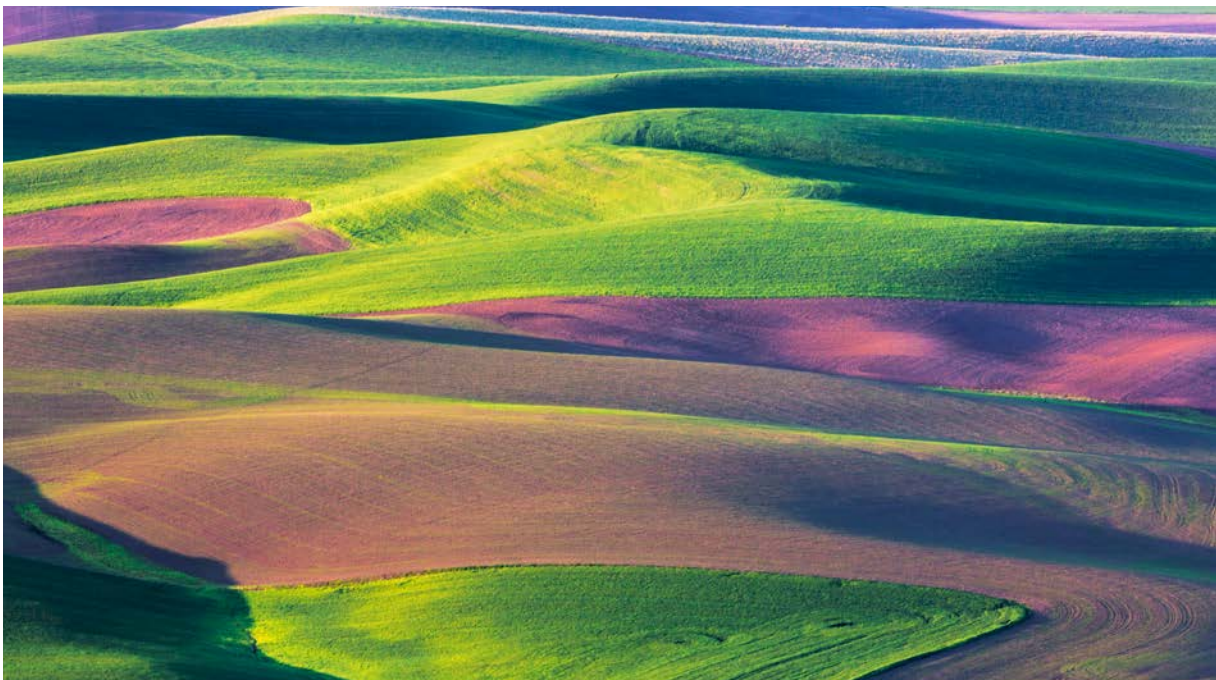
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6. CONDUCTING ELIGIBILITY CRITERIA ANALYSIS FOR REMOTE AUDIT

The order of options below shall be followed:

Are remote elements considered?

YES, AS PART OF REGULAR AUDIT TOOLS

YES, DUE TO FORCE MAJEURE

NO

Is the entity/facility eligible as per applicable questionnaire?

YES

Is a remote audit possible as per sections 6A or 6B?

Proceed to on-site audit

NO

YES

Proceed to on-site audit

Log into Auditor Portal and proceed to:

Is the entity/facility eligible for a Section 6C fully remote audit?

NO

Option A: partially remote audit, or

YES

Option B: fully remote audit

Log into Auditor Portal and obtain RJC approval

Discuss options with the RJC

Option C: proceed to fully remote audit

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Questionnaire to be completed by lead auditor/competent personnel to establish eligibility.

6A Partially remote audit considered as a regular assessment tool			
Member name:	**Entity/facility name & country:**	**Certification body:**	
Eligibility criteria analysis			**Yes/No**
Can the relevant corrective action(s) be fully verified remotely with no limitations, as applicable (i.e. there is no need for: employee interviews for triangulation; or on-site document sampling such as wage or working-hour records; or in-person reviews of health and safety or building changes; or in-person reviews of confidential documents)?			
Did the audit team successfully pass the assessment associated with the RJC remote auditing training course?			
Does the member have a history of good performance (≤ one suspension, ≤ one missed audit, no recurring major nonconformities, no critical breaches identified in its latest certification cycle, no confirmed allegations as part of a complaint, not subject to an ongoing investigation/negative media attention or stakeholder feedback related to its compliance with the RJC standards, since its last audit[5])?			
Did the member submit to its auditor a completed/updated self-assessment for the relevant standard version one month prior to the audit? The audit cannot proceed without the self-assessment and the auditor must record receipt in the audit record in the RJC Auditor Portal and/or in the audit report.			
Is the member's documentation sufficiently digitised and available in preparation for the audit to allow for remote auditing?			
Can the member provide all necessary documentation on time via ICT, in compliance with data security and privacy regulations?			
Was a test video-conference conducted prior to the audit to ensure there is sufficient technological capacity and skill to assess conformity, on either side (member and auditor)? Date: .... The audit cannot be conducted remotely if the video function at all sites has not been assessed.			
Final eligibility decision: is the member entity/facility eligible for a partially remote audit? A partially remote audit requires a '**Yes**' answer to **all** the above questions.			
Audit date(s):	**RJC standard and version:**		
Audit type:			
Member type (single/multi-site):			
Remote audit elements, including facilitator details, if applicable:			

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5   The certification body shall reach out to the RJC to enquire about suspension and missed audits, should it not have the information.

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Partially remote audit specific requirements:

Partially remote audits are a combination of on-site and remote audit elements, at entity/facility level or member level. Certification bodies can choose from the following **accepted remote elements as part of a partially remote audit**:

- Remote document review.

- Remote management interviews.

- Use of facilitators with a remote lead auditor, as per the methodology section.

- A fully remote audit at entity/facility level (for multi-site members), provided the entity/facility complies with the eligibility criteria for fully remote audits in Section 6B, while the other entities/facilities are audited on-site or using a combination of on-site and remote elements. This approach is considered an overall partially remote audit at member level and the applicable questionnaires need to be completed by the lead auditor/competent personnel to establish eligibility for each entity/facility or group of entities/facilities where the same format of remote audit is considered.

- For COC audits, verification of medium-risk outsourced contractors, including the contractor visit, provided there is no associated nonconformity and the conditions below are met:

  – The scope of the verification is limited to checking the member's risk assessment, its own on-site assessment and how the outsourced contractor conforms to COC 2017 provision 4/COC 2024 provision 2 on Internal Material Controls.

  – The member has provided or committed to providing to its auditor a completed risk assessment defining how it has concluded that the contractor meets the medium-risk rating, together with details of its latest on-site visit prior to the requested remote audit. The audit cannot proceed without the risk assessment and internal audit and the auditor shall record receipt in the audit report.

  – No significant issues have been found in relation to the member's risk assessment of its outsourced contractors.

  Any remote elements shall take place before the on-site elements, for each individual entity/facility, to allow the RJC auditor to cover any other requirement that they could not cover remotely during the subsequent on-site visit. In case more audit time is needed due to additional checks or new processes at the member's end that only came to light during the on-site visit, and should it be possible to audit them remotely without compromising the integrity of the audit, this can take place after the on-site visit(s).

  It should be noted that where a partially remote audit is undertaken, all elements of the audit shall be completed **within six months** (i.e. no more than six months are to elapse between opening and closing meeting dates) **and before certificate expiry date, plus a tolerance of 10 working days, in the same way as for the on-site audit**.

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Questionnaire to be completed by lead auditor/competent personnel to establish eligibility.

6B Fully remote audit considered as a regular assessment tool		
Member name:	**Entity/facility name & country:**	**Certification body:**
Eligibility criteria analysis		**Yes/No**
Is the audit: • A COP/LGMS recertification audit? • A COP/LGMS special audit? • A COP/LGMS audit for a virtual business with no physical office/facilities?[6] • A COC surveillance[7] audit where the member uses only low-risk subcontractors (no medium- or high-risk)?		
Does the member entity/facility have up to 15 employees/+2 tolerance,[8] (including management and direct and contracted employees)?		
Is the activity of the entity/facility: • for COP/LGMS audits: that of a retailer, wholesaler, trader, service provider, or testing and grading laboratory? • for COC audits: that of a retailer, wholesaler or low-risk service provider (i.e. low risk of substitution or failures in internal material controls, no conversion, etc.)?		
Was the previous audit completed by the same certification body?[9]		
Can the existing corrective action(s) be fully verified remotely with no limitations, as applicable (i.e. there is no need for: employee interviews for triangulation; or on-site document sampling such as wage or working-hour records; or in-person reviews of health and safety or building changes; or in-person reviews of confidential documents)?		
Can all sections of Step 2 – Evaluation (RJC Certification Process Requirements for Certification Bodies and Auditors) or 12.3 Audit (Assessment Manual version 1.3) be verified remotely?		
Was the entity's/facility's previous audit completed on-site?[10]		

6   Should these virtual businesses use physical facilities, e.g. logistics (owned by them or by third parties), the certification bodies shall engage with the RJC for advice on a case-by-case basis.

7   Fully remote audits are not permitted for COC initial certification or recertification audits as the member's facilities must undergo on-site assessment to verify the controls along the production process.

8   Limits on employee numbers do not apply to provenance claims bolt-on audits, if triangulation is not needed to verify corrective actions, as applicable.

9   The certification body shall have experience of the performance history of the entity/facility that indicates that a remote audit would not impact the integrity of the audit. This would include knowledge of the member's processes, data recording and document handling systems and the member's previous cooperation and ability to participate fully in a remote audit, as applicable.

10 Except for a COP/LGMS fully remote surveillance recommended and conducted as per the RJC Certification Process Requirements for Certification Bodies and Auditors (or for a COP 2019 desktop mid-term review recommended as per the Assessment Manual version 1.3 dated December 2020). Partially remote audits at member level are eligible, as long as the entity/facility to be audited did not have a previous fully remote audit.

11 The certification body shall reach out to the RJC to enquire about membership suspension and missed audits, should it not have the information.

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6B Fully remote audit considered as a regular assessment tool	
Eligibility criteria analysis	**Yes/No**
Does the member have a history of good performance (≤ one membership suspension, ≤ one missed audit, no recurring major nonconformities, no critical breaches identified in its latest certification cycle, no confirmed allegations as part of a complaint, not subject to an ongoing investigation/negative media attention or stakeholder feedback related to its compliance with the RJC standards, since its last audit[11])?	
Are worker interviews possible and appropriate? (Members commit to implementing the conditions laid out in the methodology section below regarding the interview environment, as applicable.)	
Did the member: • Confirm in good time before the audit that the scope, the management structure[12] and directors remain unchanged?	
• Or communicate any scope changes to both the certification body and the RJC?	
Did both auditor and member consent to a fully remote audit?	
Did the member provide the auditor with a site map ahead of the fully remote audit, for desktop and mobile remote audits?	
Did the member designate a member of staff to support the auditor during a fully remote audit?	
Did the audit team successfully pass the assessment associated with the remote auditing training course?	
Can the guidance provided in sections A 15(c), Visiting the Auditee's Location, and A.16, Auditing Virtual Locations and Activities, in ISO 19011:2018 be followed?	
Did the member submit to its auditor a completed/updated self-assessment for the relevant standard version one month prior to the audit? The audit cannot proceed without the self-assessment and the auditor shall record receipt in the audit record in the RJC Auditor Portal and/or in the audit report.	
Is the member's documentation sufficiently digitised and available in preparation for the audit to allow for remote auditing?	
Can the member provide all necessary documentation on time via ICT, in compliance with data security and privacy regulations?	
Final eligibility decision: is the entity/facility eligible for a fully remote audit? A fully remote audit requires a '**Yes**' answer to **all** the above questions.	

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12   Please note that a change in management may result in changing the way work is performed. In case of mergers/acquisitions, any new ownership will most likely bring new systems into the acquired business.

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6B Fully remote audit considered as a regular assessment tool	
Audit date(s):	**RJC standard version:**
Fully remote audit (desktop remote audit or desktop and mobile remote audit):	
Member type (single/multi-site):	
Breakdown of details by individual entity/ facility scheduled to be audited remotely, including number of staff and country:	

An on-site/partially remote COP/LGMS surveillance (or COP 2019 mid-term review) audit shall be recommended by the certification body, following a fully remote audit as regular assessment tool. This shall be documented in the audit report, and the member shall be reminded of this recommendation during the audit closing meeting.

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Questionnaire to be completed by lead auditor/competent personnel to establish eligibility.

6C Fully remote audit as force majeure			
Member name:	**Entity/facility name & country:**	**Certification body:**	
Eligibility criteria analysis			**Yes/No**
Is the member entity/facility unable to meet <u>**any**</u> eligibility criteria in Section 6A or Section 6B, as applicable?			
Are there any restrictions imposed in response to exceptional circumstances amounting to force majeure, such as, but not limited to, situations where: • the auditor is unable to travel due to lockdown situations, or legal requirements banning official travel or gatherings and restricting transportation?			
• the RJC member is not allowing external visitors on-site for health and safety reasons imposed specifically by the exceptional circumstances?			
• conducting an on-site audit could present significant health risks to the auditor or the personnel on-site?			
• social distancing restrictions that would severely impact the ability to conduct an effective audit are in place?			
• Other (please advise): ……………………………………………………………………………………….			
Are <u>**all**</u> the criteria in **B4, B5, B6, B7, B8, B9, B10, B11, B12, B13, B14, B15, B16, B17 and B18** met ('Yes' answer)?			
In addition, is the audit: • a COP/LGMS recertification audit?			
• a COP/LGMS partially remote/on-site surveillance (former mid-term review) audit?			
• a COP/LGMS special audit?			
• a COP/LGMS audit for a virtual business with no physical office/facilities?[13]			
• an initial COP/LGMS certification audit? – and did the member confirm awareness and use of the RJC resources available on the <u>RJC website</u> and <u>Member Portal</u>?			
• a COC surveillance[14] audit where the member uses only low-risk subcontractors (no medium- or high-risk)?			
Does the entity/facility have up to 100 employees (including management and direct and contracted employees)?[15]			

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13 Should these virtual businesses use physical facilities, e.g. logistics (owned by them or by third parties), the certification bodies shall engage with the RJC for advice on a case-by-case basis.

14 Fully remote audits are not permitted for COC initial certification or recertification audits as the members' entities/facilities must undergo on-site assessment to verify the controls along the production process.

15 Limits on employee numbers do not apply to surveillance audits (former COP 2019 mid-term reviews) or provenance claims bolt-on audits, or COC surveillance audits, if triangulation is not needed to verify corrective actions, as applicable.

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6C Fully remote audit as force majeure	
For COP/LGMS initial certification audits at an entity/facility with between 18 and 100 employees (including management and direct and contracted employees), is the entity/facility also: • certified and/or audited against other schemes/standards covering social topics and health and safety (i.e. ISO 45001 H&S or social audits such as SA 8000, four-pillar SMETA, BSCI) in the last 12 months, with no open major nonconformities or high risks, and a corrective action plan for any minor nonconformities? and/or	
• part of a group and undergoing annual corporate oversight with a scope similar to the COP/LGMS provisions on social topics and health and safety, where the last detailed oversight report (no older than 12 months) shall be available for review during the audit, as confirmed by the member?	
Is the activity of the entity/facility: • for COP/LGMS audits: that of a retailer, wholesaler, trader, service provider, testing and grading laboratory or diamond cutting and polishing unit?	
• for COC audits: that of a retailer, wholesaler or low-risk service provider (i.e. low risk of substitution or failures in internal material controls)?	
Final eligibility decision: is the entity/facility eligible for a fully remote audit as force majeure? This requires a '**Yes**' answer to **all** the above questions.	
Did the certification body obtain prior RJC approval for this audit to validate the decision?	
Audit date(s):	**RJC standard version:**
Fully remote audit (desktop remote audit or desktop and mobile remote audit):	
Member type (single/multi-site):	
Breakdown of details per individual entity/ facility scheduled to be audited remotely, including number of staff and country:	

An on-site/partially remote COP/LGMS surveillance (or COP 2019 mid-term review) audit shall be recommended by the certification body, following a fully remote audit as force majeure. This shall be documented in the audit report, and the member shall be reminded of this recommendation during the audit closing meeting.

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7. METHODOLOGY FOR CONDUCTING REMOTE AUDITS

7.1. GENERAL REQUIREMENTS FOR CERTIFICATION BODIES

A remote audit is to be considered as an on-site audit for the application of the related International Accreditation Forum Mandatory Documents (IAF MD 4 and IAF MD 5). It can cover the following audit activities:

- conducting the opening meeting.
- performing document review while conducting the audit.
- communicating during the audit.
- assigning roles and responsibilities of guides and observers.
- collecting and verifying information.
- generating audit findings.
- preparing audit conclusions.
- conducting the closing meeting.

In addition, the certification bodies shall:

a) have a documented procedure for planning, preparing and conducting remote audits. This procedure shall be developed in keeping with any local legal requirements and the relevant norms and standards, including but not limited to:

- UK Data Protection Act 2018
- EU General Data Protection Regulation (EU GDPR)
- IAF ID 3:2011 Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations

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- IAF ID 12:2023 Principles of Remote Assessment
- IAF MD 4:2023 The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes
- IAF MD 5:2023 Determination of Audit Time of Quality, Environmental, and Occupational Health & Safety Management Systems
- ISO 9001 Auditing Practices Group: 2020 Guidance on Remote Audits
- ISO 19011: 2018 Auditing Management Systems

b) Ensure that all RJC auditors scheduled to conduct remote audits have the necessary competencies and skills to apply a consistent approach. This shall be achieved through bespoke training and regular calibration against the certification body's documented procedure covering remote audit planning, preparation and execution, including use of ICT, as well as against this protocol. The date and contents of this auditor training must be recorded and available for review during oversight assessments and be made available to the RJC on request. The training against this protocol shall be documented in the RJC database.

c) Have a contingency plan for connectivity and technological issues and associated delays, including alternative internet connection and ICT.

d) Ensure the security and confidentiality of electronic or electronically transmitted information when using ICT for audit purposes.

The implementation of the above requirements shall be verified by the RJC oversight provider/ accreditation body during the regular oversight assessments, where remote audits have been conducted, taking into consideration the number of remote audits conducted by a certification body in a year.

7.2. AUDIT PLANNING AND PREPARATION REQUIREMENTS

When planning and preparing a remote audit, certification bodies shall take into account that:

- up to 25% more preparation time may be needed compared to an on-site audit.
- there is a greater risk of misunderstanding through the use of virtual communication tools.
- concentration may be affected and can impact audit duration and the need for breaks.
- the audit plan or combination of options for a remote audit is not static in time. Issues may be uncovered during the audit, relating to the member's scope or practices that may change the risk level that applies to the audit being conducted and require that the audit reverts to an on-site model. The key objective is to ensure that the integrity of the audit and the resulting certification recommendations are not compromised as a result of the approach.

As such, certification bodies' dedicated procedures shall include mitigation measures for the above risks inherent in a remote audit.

When planning and preparing a remote audit, certification bodies shall:

a) implement and follow this remote audit protocol, with particular attention given to the eligibility criteria for assessing RJC members' suitability before planning a remote audit.

b) assess and document feasibility and risks with the member.

c) once the appropriate remote audit option has been agreed with the member, digitally document the remote audit details in the Auditor Portal.

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d) ensure any facilitators, with the exception of interpreters, shall have completed the relevant RJC training modules and successfully passed the assessments before the audit.

e) determine, explicitly agree on and test the ICT to be used with the member, including live sharing of the entity's/facility's GPS coordinates on the audit day, the document sharing pathway and data security provisions and ensure provision of a camera with high enough resolution for the site tour (to allow for clear visibility of small details). The camera's suitability must be included in the test to confirm there is sufficient Wi-Fi broadband bandwidth across the entire site. ICT with identified security gaps shall not be used. The certification bodies shall assess the public domain regarding known security gaps for ICT and shall inform auditors if new security gaps are reported and after these are closed.

f) confirm that the entity/facility has a stable and reliable Wi-Fi connection and/or mobile network coverage across the entire site, with an agreed contingency plan should either of these fail.

g) test ICT competence and ease and ability of use for both auditor and member.

h) confirm that all documentation and information requested by the auditor with regard to member compliance is sufficiently digitised and can be made available within timeframes specified by the auditor, which must never exceed eight hours.

i) define the agenda, including the planned time slots of the audit and adapting arrangements that are different from those of an on-site audit (e.g. clear and precise definition of tasks for each audit team member).

j) have the RJC member identify the key personnel and contingency personnel (should there need to be any replacements) to be interviewed (by using the agreed ICT) and ensure their availability at defined times (except for worker interviews on social topics).

k) discuss the arrangements that the member can make to accommodate the worker interviews, and assess its compliance with this protocol, as a condition for the audit. Remotely view and assess the area/room proposed for the worker interviews. Confirm the time needed for workers to access the room and include sufficient time for 'changeover' between employees to be interviewed and factor it in. This shall not apply to workers working from home.

l) require the member to commit to not seeking to obtain information from workers about what was discussed in the interview, nor retaliating against workers selected for interview, as a condition of the audit.

m) confirm with the member whether, and in what proportion and roles, member employees work from home. If the percentage of the workforce on-site at one time has been reduced due to social distancing or reduced orders, the auditor shall take this into consideration.

o) confirm with the member that all employees' phone numbers are in HR's possession and can be accessed during the audit after interview sampling.

p) request the member to inform all remote-working employees before the audit that they might be selected and to make themselves available (if necessary) for a call from the auditor, to avoid them not accepting the call from an unknown number or refusing to share their views with an unknown caller.

q) request and obtain any additional documents that the member must share for remote auditing purposes, aside from the usual document list, e.g. a site map with any hazardous chemical areas clearly marked in order to plan a virtual tour, etc.

r) if a partially remote audit is to be conducted, define and share with the member which elements shall be audited virtually and which elements shall be audited on-site.

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7.3. AUDIT EXECUTION REQUIREMENTS

a) Use of ICT

Remote assessment technologies[16] may vary according to the individual audit situation and technical opportunities, and should include but are not limited to:

- exchange of documents, records, pictures, satellite images or other items by email or other means.
- remote assessment of documents, records, pictures and satellite images by shared screens.
- meetings by means of teleconference facilities, including audio, video and data sharing.
- individual phone/app calls and staff interviews (by video conference calls).
- virtual company tours through use of cameras by local staff/facilitators.

During a remote audit, recording is only allowed during the closing meeting and any other instances where the member has given permission. Worker interviews on social topics shall not be recorded by any parties under any circumstances.

The technologies used shall allow real-time video and audio of the following activities:

- Execution of remote activities (between member and auditor). A minimum of 70% of the time must be allocated to real-time video interaction with the member and its employees, with the remainder being used for document review.
- A site tour in real time when workers are operating, with pre-recording not being accepted as reliable compliance. The auditor shall be the one who sets the pace of the tour, asking to see details as required.
- Sampling of documents (e.g. supplier invoices, sales invoices) to prevent any manipulation of the sampled documents prior to their submission to the auditor.
- Sampling of workers for interviews on social topics, to prevent any coaching prior to the interview.

b) Qualifications and role of the facilitator

The partially remote (also called hybrid, facilitated or semi-remote) audit can make use of facilitators for those parts that are more difficult to carry out remotely, such as worker interviews on social topics, or site tours. These elements shall be conducted with RJC lead auditors remotely and closely guiding facilitators on the ground in real time. This is an efficient alternative if the cost of travel is prohibitive in relation to the time required on-site or if international travel restrictions apply but local attendance is still possible. The use of a facilitator shall not be in lieu of an RJC auditor's visit if one is available and allowed on-site.

A facilitator is an individual who acts as the eyes and ears on the ground for the remote audit team.[17] The facilitator's purpose is to ensure that the audit process reaches a maximum credibility level.

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16 Better Gold Initiative, Remote Audits and Assessments: Experiences from the Forestry and Mining Sectors, p. 12, https://www.projekt-consult.de/newsletter/downloads/641266/BGI_Report_-_Remote_Assessments.pdf.

17 ISEAL Alliance, Guidance – Remote Auditing Good Practices, v0.1 March 2021 p. 11, https://www.isealalliance.org/sites/default/files/resource/2021-03/Remote%20Auditing%20Good%20Practices%20ISEAL%20Guidance%20v0.1%20March%202021.pdf.

Appendix 9 - Remote Audit Protocol

Qualifications:

- The facilitator may be an employee, an auditor or a contractor of the certification body who is not an RJC lead auditor but is of credible and competent standing. The facilitator may be qualified for other sustainability systems or may have other auditing qualifications.

- The facilitator may also be an interpreter or a guide, also acting as the camera operator, with an earphone to be able to relay the conversation between auditor and member without disturbing the audit.

- The facilitator shall have completed the relevant RJC training modules and successfully passed the assessments before the audit, except for interpreters, who do not need to have achieved this.

- The facilitator shall have access and sufficient technical skills to utilise any required ICT, including the video capabilities necessary to share field observations, and be able to resolve technical issues if necessary.

Role:

The facilitator shall follow strict live instructions from the remote lead auditor when carrying out the following activities:

- Controlling the interview environment to ensure the absence of member management interference.

- Checking that interviews are not recorded and the existence of any surveillance.

- Checking for hazardous working environments or indicators of child labour, forced labour or trafficking, including migrant workers.

- Checking for traceability and segregation of materials during a COC audit.

- Any other instructions given by the auditor.

Procedure:

- The number of facilitators required for the audit shall be as appropriate to the number of auditors in the audit team.

- The audit person days of the facilitator shall not be accounted as audit person days of the certification body's audit team.

- When using a facilitator, the communication with the virtual lead auditor shall be synchronous (as opposed to asynchronous) for at least 80% of the audit time.

- The facilitator can raise any concerns to the lead auditor during the audit.

- The certification body shall ensure there is good coordination among the team members, through thorough preparation, clear distribution of tasks and regular communication among the audit team, facilitators included, during the implementation of the audit. Technology and connectivity need to be carefully planned for and have a contingency in place, including when facilitators are used.

17   **RESPONSIBLE JEWELLERY COUNCIL**
APPENDIX TO RJC CERTIFICATION PROCESS REQUIREMENTS FOR CERTIFICATION BODIES AND AUDITORS AND MEMBER CERTIFICATION HANDBOOK

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The facilitator must not under any circumstances:

- replace, in whole or part, the role of the audit team in making decisions, conducting evaluations or reaching compliance conclusions.
- participate in writing the audit report and/or the audit findings.

Note:

Should there be a suitable APSCA-certified (CSCA or registered (RA)) certification body auditor who is not RJC approved but can qualify for the social elements of the audit, certification bodies are encouraged to apply for their RJC approval with a limited scope. This may eliminate the need for a lead auditor to supervise remotely, and the associated cost.

c)   **Remote worker interviews on social topics**

Certification bodies shall follow the methodology described below when conducting remote worker interviews:

- Depending on the number of workers, a sample of up to 10 workers shall be selected for interview and grouped as follows:
  - Five workers selected: two workers for individual interviews and three workers for a group interview.
  - Ten workers selected: two workers for individual interviews and two groups of four workers each for group interviews.
  - Should part of the workforce work remotely, the auditor shall take this into consideration when selecting workers for interview. Where remote workers can be sampled and interviewed at home, one group of four workers can be converted to four individual interviews as per regular on-site procedure.
  - For less than five workers selected, the auditor shall decide on the proportion of individual and group interviews, keeping in mind workers' safety.
- Remote interviews must be conducted using video via workers' personal phones and during working hours. The video function allows the auditor to read non-verbal cues and body language and is therefore absolutely necessary. The auditor shall ensure that the management has allowed on-site workers to use their personal phones before conducting the interviews.
- Each interview is to be held in a 'secure' private location with sufficient connectivity for a remote live interview and no CCTV equipment installed (this could be the grounds, the canteen or even their home if they are working from home, but cannot be an office room where freedom from recording or interference cannot be guaranteed). No management or other member of staff can be present in the room during worker interviews. Where CCTV equipment is available, the auditor must ensure, prior to the interview, that member management cannot access the interview via an audio function.
- The worker is to show a 360-degree view of the area/room prior to the commencement of the interview (so that the auditor can confirm it is the same room assessed in the planning phase, and the absence/covering of any CCTV equipment installed and absence of any supervising personnel) and sit with their back towards the closed door so anybody entering can be seen. This shall not apply to workers working from home.

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- If a worker does not have access to a personal phone allowing video calls, then they can use either:
  - a mobile phone with video functionality provided by the management and kept in the interview room; or
  - another device provided by the management, such as a laptop, if it has a 360-degree camera that allows the auditor to know whether the interviewee is being supervised by management or they are on their own. The auditor shall ensure that there is no active recording function.
- Since the auditor cannot oversee the worker's complete environment in the same way as during an on-site audit, the auditor shall start the interview with questions aiming to verify whether the worker feels comfortable to proceed and considers themselves to be in a confidential environment.
- The certification body shall also provide a 'grievance hotline' through which workers may contact them privately either before or after the audit to raise any concerns they may have. A document shall also be provided ahead of the audit to explain the process to the workers, to be shared by the management and through the workers' committee, where applicable. The auditor may send contact cards to the entity/facility ahead of the audit and request for them to be left in the interview room for the workers.
- Should a facilitator be used, please see above for the facilitator's role in this context.

7.4. AUDIT REPORTING REQUIREMENTS

When completing the RJC audit report, certification bodies shall complete the remote audit section in full, with all the required details as per the audit report template.