

Remote Audit Supplement (RAS) to the RJC Assessment Manual

1. Purpose

The RJC recognises that effective remote audit practice can support a more resilient and flexible audit process through increased time efficiency, lower costs and carbon footprint, and facilitate access to a broader range of experts¹, and certification continuity. It can also improve the potential reach of audits by increasing the number and type of facilities that can be covered, for example, by making it possible for facilities where there is no local presence of auditors to be audited or for specific topics to be evaluated across a wider sample of locations in a time and cost-effective manner. At the same time, the inherent nature of the remote audit requires specific conditions to maintain the integrity and robustness of the audit programme.

The purpose of this Remote Audit Supplement (RAS) is to:

- expand the RJC suite of remote audit elements² to be used as regular assessment tools by RJC-approved Conformity Assessment Body (CAB) when assessing members' conformance to the RJC Code of Practices (COP) and Chain of Custody (CoC) standards.
- retain some remote audit solutions first introduced by the Remote Audit Derogation (RAD)³, for exceptional circumstances amounting to force majeure.
- specify the conditions (eligibility criteria) under which the above remote elements can be used and the methodology for their effective implementation.
- detail the requirements and methodology for CABs to follow to ensure that remote audits are conducted in a controlled, consistent and credible manner across all the CABs.

2. Scope

RAS applies to all RJC audit types whereby a member and their facility(ies)/(sites) meet the eligibility criteria outlined in section 6.

RAS is additional to, and where specified, supersedes the requirements in the Assessment Manual (version 1.3 December 2020), sections 12.2.3 and 12.2.4 (p. 49 – 55), Table 14 (p. 62) and Table A4 (p. 73). This RAS will be incorporated into the Assessment Manual at the next revision.

3. Responsibility

¹ Better Gold Initiative, Remote Audits and Assessments. Experiences from the forestry and mining sectors, p. 24.

² 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).

³ An RJC RAD was issued in 2021 outlining the criteria for RJC approved CABs to conduct remote audits under exceptional circumstances, namely the Covid pandemic, which impacted the ability of CABs to conduct onsite audits against the RJC standards.

CAB Program Managers for the RJC, RJC approved auditors and any other CAB personnel involved directly and indirectly in RJC remote audit activities are responsible for the implementation of, and conformance with this supplement. The RJC General Manager – Assurance & Certification, is responsible for the periodic review and update of the RAS, following consultation with CABs and approval from the Assurance Committee.

4. Definitions

Audit types refers to all the audits allowed under the RJC standards e.g. COP / CoC initial certification / re-certification, COP mid-term review, Coc surveillance audit etc.

Eligibility criteria analysis: collecting and assessing member & site information by CABs 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 whereby the auditor is not physically present at the member's facilities. The remote audit **format** may be either a 'fully remote audit' or a 'partially remote audit'. Both remote audits cover the same scope and process as an onsite audit, with the only difference being a change in format.

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

- a) A **desktop remote audit** is a static audit which is carried out remotely via real-time videoconferencing to assess a member's compliance. This fully remote audit is only applicable to an audit of restricted scope whereby 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 their site(s), dictating specific elements to be shown or demonstrated that relate to assessing 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 onsite and remote mechanisms to assess compliance. Partially remote audits are split into two or more parts, whereby the remote elements and onsite elements assessed separately.

A **Facilitator** is a local employee or contractor of the CAB who is not an RJC approved lead auditor (but may be under training or have other auditing qualifications) and who supports and is directed by the remote RJC audit lead / team as their eyes and ears on the ground during a remote audit⁴. During the partially remote audit, RJC remote lead auditors can

⁴ ISEAL Guidance – Remote Auditing Good Practices p. 11 [Remote Auditing Good Practices ISEAL Guidance v0.1 March 2021.pdf \(isealalliance.org\)](https://www.isealalliance.org/~/media/Files/2021/03/Remote_Auditing_Good_Practices_ISEAL_Guidance_v0.1_March_2021.pdf)

direct a local facilitator to help them verify practices on the ground, if the CAB does not have an RJC approved 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 factors⁵.

When considering the use of remote audit elements, CABs are required to:

- Conduct an eligibility criteria analysis to determine whether the member/site is eligible and for what type and format of remote audit, by completing the applicable enclosed questionnaires. For multi-site members, sites shall be grouped per remote audit format and the applicable questionnaires completed.
- For combined audits, ensure all schemes covered allow for a remote audit.
- Record the remote audit in the RJC Auditor Portal⁶ and include the completed eligibility analysis questionnaire(s), at least 5 days before the audit takes place.
- 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.

When remote audit elements are used as regular assessment tools, RJC approval will not be needed prior to audit. However, the RJC reserves the right to sample and review these digital records at any time up to the date the certificate is issued. 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 CAB to implement additional safeguards (e.g. additional onsite audit to fully verify conformance), at the CAB's expense or reject the audit report completely. Where the RAS is systemically not followed by a CAB, the RJC may reinstate RJC approval before a remote audit is carried out or no longer allow the CAB to conduct remote audits.

Exceptions to the eligibility criteria in sections 6A and 6B (remote audit as regular assessment tool) will not be considered by the RJC. Any exceptions to the eligibility criteria in section 6C (force majeure) will 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 jeopardize the credibility of the RJC certification. The RJC will respond within five (5) working days (Mon-Fri).

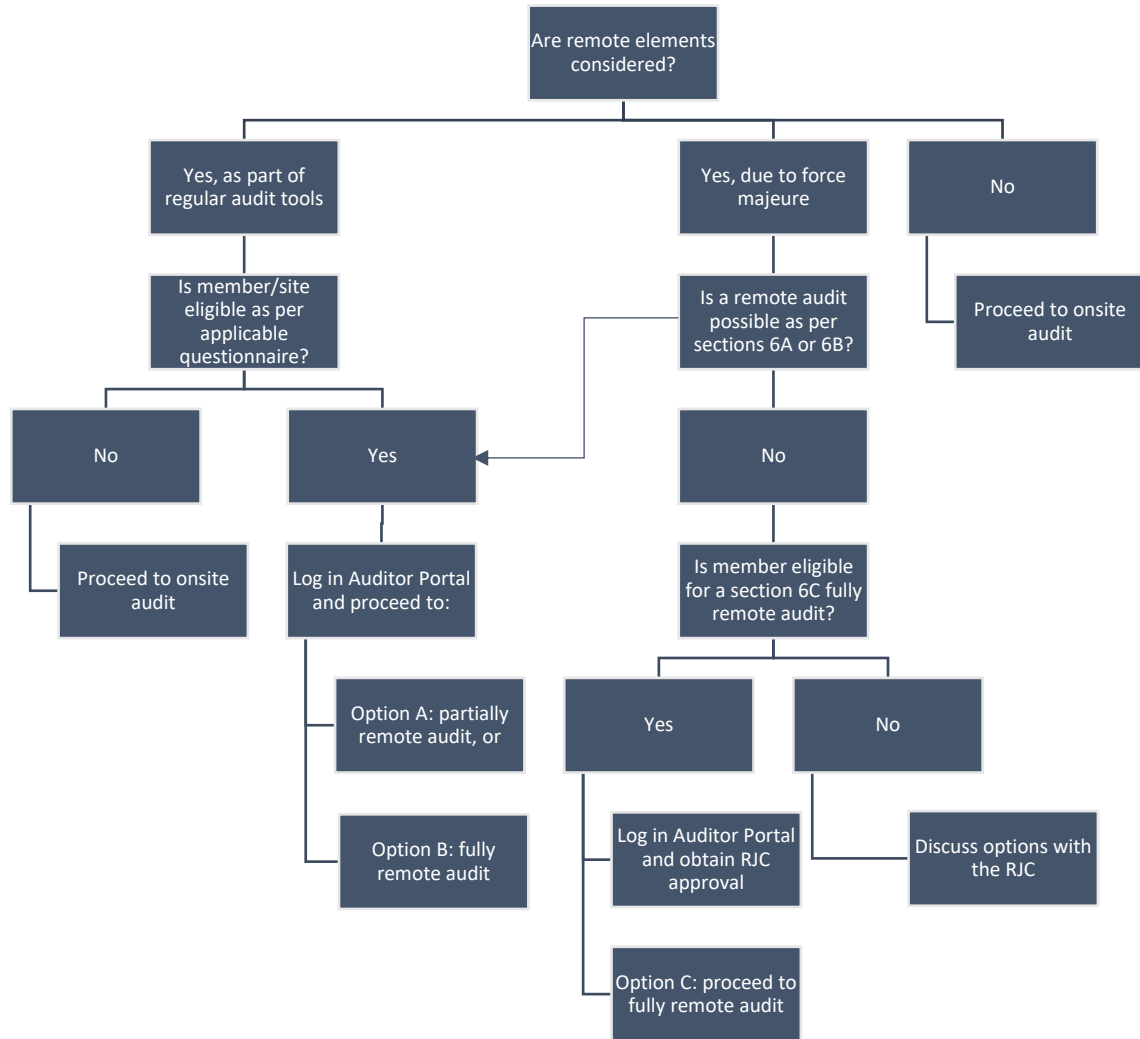
Where the RJC rejects a remote audit requested under section 6C, the rationale for that decision will be provided in writing at the same time. Retrospective requests under section 6C (during and after the audit has taken place) will not be authorised and the audit report will be rejected.

⁵ ISEAL Guidance – Remote Auditing Good Practices p. 5 [Remote Auditing Good Practices ISEAL Guidance v0.1 March 2021.pdf \(isealalliance.org\)](#).

⁶ Should the Auditor Portal not be accessible, the completed eligibility analysis questionnaire(s) shall be sent by email to assurance@responsiblejewellery.com.

6. Conducting eligibility criteria analysis for remote audit

The below order of options shall be followed:



Questionnaire to be completed by Lead Auditor/competent personnel to establish eligibility.

A. Partially remote audit considered as regular assessment tool		Yes/No
Member name:		Site name & Country:
		CAB:
Eligibility criteria analysis	1) Can the existing corrective action(s) be fully verified remotely with no limitations, as applicable (i.e. do not require worker interviews for triangulation)?	
	2) Did the audit team successfully pass the assessment associated with the RJC Remote Auditing training module?	
	3) Does the member have a history of good performance? (≤ one suspension, ≤ one missed audit, no recurring major non-compliances, no critical breaches identified in their latest certification cycle, no confirmed allegations as part of a complaint or subject to an ongoing investigation/negative media attention or stakeholder feedback related to their compliance to the COP/CoC, since their last audit ⁷).	
	4) Did the member submit or commit to submit to their auditor a completed self-assessment for the relevant standard version, within six months 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.	
	5) Is the member's documentation sufficiently digitised and available in preparation for the audit to allow for remote auditing?	
	6) Can the member provide all necessary documentation on time via ICT, in compliance with data security and privacy regulations?	
	7) Was a test videoconference 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 in the absence of the video function at all sites being assessed.	
Final Eligibility decision: is member/site eligible for 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:		

⁷ The CABs shall reach out to the RJC to enquire about suspension and missed audits, should they not have the information.

Partially remote audit specific requirements:

Partially remote audits are a combination of onsite and remote audit elements, at site level or member level. CABs can choose from the below **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 methodology section,
- a fully remote audit at site level (for multi-site members), provided the site complies with the eligibility criteria for fully remote audits in section 6B, while the other site(s) are audited onsite or using a combination of onsite and remote elements. This approach is considered an overall partially remote audit at member level and the applicable questionnaires need to be completed per each site or group of sites where the same format of remote audit is considered.
- for CoC audits, verification of medium risk outsourced contractors, including the contractor visit, provided there's no associated non-conformance and the below conditions are met:
 - ✓ The scope of the verification is limited to checking the member's risk assessment, their own onsite assessment and how the outsourced contractor is conforming to CoC provision 4 on Internal Material Controls.
 - ✓ The member has provided or committed to provide to their auditor a completed risk assessment defining how they have concluded that the contractor meets the medium risk rating, together with their latest onsite visit prior to the requested remote audit. The audit cannot proceed without the risk assessment and internal audit and the auditor must record receipt in the audit report.
 - ✓ No significant issues have been found in relation to the member's risk assessment of their outsourced contractors.

Any remote elements shall take place before the onsite elements, per individual site, to allow the RJC auditor to cover any other requirement that they could not cover remotely during the subsequent onsite 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 onsite visit, and should it be possible to audit them remotely without compromising the integrity of the audit, this can take place after the onsite visit(s).

It should be noted that where a partially remote audit is undertaken, all elements of the audit must be completed **within four months** (i.e. no more than four months to elapse between opening and closing meeting dates) **& before certificate expiry date, in the same way as for the onsite audit.**

Questionnaire to be completed by Lead Auditor/competent personnel to establish eligibility.

B. Fully remote audit considered as regular assessment tool		Yes/No
Member name:	Site name:	CAB:
Eligibility Analysis	1) Is the audit: <ul style="list-style-type: none"> • A COP recertification audit? • A COP mid-term review audit? • A COP transition / bolt-on / extension to scope audit? • A COP audit for a virtual business with no physical office/facilities⁸? • A CoC surveillance⁹ audit where the member uses only low-risk subcontractors (no medium or high-risk)? 	
	2) Does the member/site have up to 15 employees / +2 tolerance ¹⁰ , (including management, direct and contracted employees)?	
	3) Is the activity of the member/site: <ul style="list-style-type: none"> • for COP 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.). 	
	4) Was the previous COP / CoC audit completed by the same CAB ¹¹ ?	
	5) Can the existing corrective action(s) be fully verified remotely with no limitations, as applicable (i.e. do not require worker interviews for triangulation)?	
	6) Can all sections of 12.3 Audit (Assessment Manual v1.3) be verified remotely?	
	7) Was the member's / site's previous audit completed onsite ¹² ?	
	8) Does the member have a history of good performance (≤ one suspension, ≤ one missed audit, no recurring major non-	

⁸ Should these virtual businesses use physical facilities e.g. logistics (owned by them or by third parties), the audit firms shall engage with the RJC for advice on a case-by-case basis.

⁹ Fully remote audits are not permitted for CoC initial certification or recertification audits as the members' facilities must undergo an onsite assessment to verify the controls along the production process.

¹⁰ Limits on employee numbers do not apply to COP mid-term reviews, transition audits and provenance claims bolt-on audits, or CoC surveillance audits, if triangulation is not needed to verify corrective actions, as applicable.

¹¹ The CAB shall have experience of the performance history of the member/site 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.

¹² Except for a desktop mid-term review recommended and conducted as per the Assessment Manual. Partially remote audits at member level are eligible, as long as the site(s) to be audited did not have a previous fully remote audit.

B. Fully remote audit considered as regular assessment tool		Yes/No
	compliances, no critical breaches identified in their latest certification cycle, no confirmed allegations as part of a complaint or subject to an ongoing investigation/negative media attention or stakeholder feedback related to their compliance to the COP/CoC, since their last audit ¹³ ?	
9)	Are worker interviews possible and appropriate? (members can ensure the conditions laid out in the methodology section below regarding the interview environment, as applicable).	
10)	Did the member timely confirm (before the audit) that: <ul style="list-style-type: none"> the scope, the management structure¹⁴ and directors remain unchanged? or communicated any scope changes to both CAB and the RJC? 	
11)	Did both auditor and member consent to a fully remote audit?	
12)	Did the member provide the auditor with a site map ahead of the fully remote audit, for desktop and mobile remote audits?	
13)	Did the member designate a member of staff to support the auditor during a fully remote audit?	
14)	Did the audit team successfully pass the assessment associated with the Remote Auditing training module?	
15)	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?	
16)	Did the member submit or commit to submit to their auditor a completed self-assessment for the relevant standard version, within six months prior to the audit? The audit cannot proceed without the self-assessment and the auditor must record receipt in the audit record in RJC Auditor Portal and/or in the audit report.	
17)	Is the member's documentation sufficiently digitised and available in preparation for the audit to allow for remote auditing?	
18)	Can the member provide all necessary documentation on time via ICT, in compliance with data security and privacy regulations?	
Final Eligibility decision: is member/site eligible for a fully remote audit? A fully remote audit requires a "Yes" answer to all the above questions.		
Audit date(s):	RJC standard version:	
Fully remote audit (desktop remote audit or desktop and mobile remote audit):		

¹³ The CABs shall reach out to the RJC to enquire about suspension and missed audits, should they not have the information.

¹⁴ 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 in the acquired business.



B. Fully remote audit considered as regular assessment tool		Yes/No
Member type (single / multi-site):		
Breakdown details per individual site scheduled to be audited remotely, including no of staff and country:		

Should a desktop COP mid-term review be recommended following a fully remote audit, it will take place onsite at 12 months, documented in the audit report, and member made aware of the same during audit closing meeting.

Questionnaire to be completed by Lead Auditor/competent personnel to establish eligibility.

C. Fully remote audit as force majeure		Yes/No
Member name:	Site name:	CAB:
Eligibility Analysis	1) Is member/site unable to meet <u>all</u> eligibility criteria in section 6A or section 6B, as applicable?	
	2) Are there any restrictions imposed in response to exceptional circumstances amounting to force majeure such as, but not limited to situations where: <ul style="list-style-type: none"> • The auditor is unable to travel due to lockdown situations, legal requirements banning official travel or gatherings and restricting transportation. • The RJC member is not admitting external visitors onsite due to health & safety reasons specifically imposed by the exceptional circumstances. • Conducting an onsite 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): _____. 	
	3) Are <u>all</u> the criteria in B4), B5), B6), B7), B8), B9), B10), B11), B12), B13), B14), B15), B16), B17), B18) met (Yes answer)?	
	4) In addition, is the audit: <ul style="list-style-type: none"> • A COP recertification audit? • A COP mid-term review audit? • A COP transition / bolt-on / extension to scope audit? • A COP audit for a virtual business with no physical office/facilities¹⁵? • An initial COP certification audit and did the member confirm? <ul style="list-style-type: none"> ✓ understanding that a mandatory onsite mid-term review audit at 12 months will be recommended by CAB, regardless of the audit outcome? and ✓ awareness and use of the RJC resources available online at RJC Code of Practices Walkthrough? • A CoC surveillance¹⁶ audit where the member uses only low-risk subcontractors (no medium or high-risk)? 	

¹⁵ Should these virtual businesses use physical facilities e.g. logistics (owned by them or by third parties) the audit firms shall engage with the RJC for advice on a case-by-case basis.

¹⁶ Fully remote audits are not permitted for CoC initial certification or recertification audits as the members' facilities must undergo an onsite assessment to verify the controls along the production process.

C. Fully remote audit as force majeure		Yes/No
5) Does the member/site have up to 100 employees, (including management, direct and contracted employees) ¹⁷ ?		
6) For COP first certification audits, members/sites with between 18 and 100 employees (including management, direct and contracted employees), is the member also: <ul style="list-style-type: none"> • Certified and/or audited against other schemes/standards covering social topics and health & safety (i.e. ISO 45001 H&S or social audits such as SA 8000, 4 pillar SMETA, BSCI) in the last 12 months, with no open major non-conformances or high risks, and a corrective action plan for any minor non-conformances? and/or • Part of a group and undergoing annual corporate oversight with a scope similar to the COP provisions on social topics and health & safety, where the last detailed oversight report (no older than 12 months) will be available for review during the audit, as confirmed by member? 		
7) Is the activity of the member/site: <ul style="list-style-type: none"> • for COP audits: that of a retailer, wholesaler, trader, service provider, or testing and grading laboratory or diamond cutting & 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 member/site eligible for a fully remote audit as force majeure? This requires a "Yes" answer to all the above questions.		
Did the CAB obtain prior RJC approval for this audit to validate 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 details per individual site scheduled to be audited remotely, including no of staff and country:		

A mandatory onsite mid-term review audit at 12 months will be recommended by CAB, regardless of the audit outcome, following a fully remote audit as force majeure. This shall be documented in the audit report, and member shall be reminded of the same during audit closing meeting.

¹⁷ Limits on employee numbers do not apply to COP mid-term reviews, transition audits and provenance claims bolt-on audits, or CoC surveillance audits, if triangulation is not needed to verify corrective actions, as applicable.

7. Methodology for conducting remote audits

7.1. General CAB requirements

Remote audit is to be considered as an onsite audit for 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 CABs are required to:

- a) Have a documented procedure for planning, preparing and conducting remote audits. This procedure needs to 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
 - 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 approved 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 CAB documented procedure covering remote audit planning, preparation and execution, including use of ICT, as well as against the RJC RAS. The date and contents of this auditor training must be recorded and available for review during oversight assessments and be made available to RJC on request. The training against the RJC RAS will 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 Assurance Services International (ASI) during the regular oversight assessments, pursuant to the RJC Accreditation Criteria, where remote audits have been conducted. The number of remote audits conducted by a CAB in a year will also be considered when planning audit witness assessments to be conducted by ASI.

7.2. Audit planning and preparation requirements:

When planning and preparing a remote audit, CABs must take into account that:

- up to 25% longer preparation time may be needed compared to an onsite audit,
- there is a greater risk for misunderstanding through the use of virtual communication tools,
- concentration may be affected and can impact audit duration and need for breaks,
- the audit plan or combination of options for a remote audit are 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 onsite 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, CABs' dedicated procedure shall include mitigation measures for the above risks inherent to a remote audit.

When planning and preparing a remote audit, CABs are required to:

- a) Implement and follow the RAS, 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.
- d) Ensure any facilitators with the exception of interpreters will have completed the RJC relevant 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 site's GPS coordinates on the audit day, the document sharing pathway, data security provisions and a high enough resolution camera 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 CABs shall assess the public domain regarding known security gaps for ICT and will inform auditors in case new security gaps are reported and after these may be closed.
- f) Confirm that the site 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, ease and ability of use for both auditor and member.
- h) Confirm that all documentation and information requested by the auditor with regards to member compliance is sufficiently digitised and can be made available within timeframes specified by the auditor, which must never exceed 8 hours.
- i) Define the agenda, including the planned time slots of the audit and accommodating dispositions different from an onsite audit (e.g. clear and precise definition of tasks for each audit team member).

- n) 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).
- o) Discuss the arrangements that the member can make to accommodate the worker interviews, and assess their 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 “change-over” between employees to be interviewed and factor it in. This will not apply to workers working from home.
- p) Require the member to commit not to seek to obtain information from workers about what was discussed in the interview, nor to retaliate against workers selected for interview, as a condition of the audit.
- q) Confirm with the member if and in what proportion and roles, member employees are working from home. If the percentage of workforce on site at one time has been reduced due to social distancing or reduced orders, the auditor shall take this into consideration.
- r) Confirm with the member that all employees’ phone numbers are in HR’s possession and can be accessed during the audit after interview sampling.
- s) 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.
- t) Request and obtain any additional documents that the member will need to share for remote auditing purposes, aside from the usual document list, i.e. site map with any hazardous chemicals area clearly marked to plan a virtual tour etc.
- u) If a partially remote audit is to be conducted, define and share with the member which elements will be audited virtually and which elements will be audited onsite.

7.3. Audit execution requirements

a. Use of ICT

Remote assessment technologies¹⁸ 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 others by email or other means;
- Remote assessment of documents, records, pictures, 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 usage of cameras by local staff/facilitators.

¹⁸ Better Gold Initiative, Remote Audits and Assessments. Experiences from the forestry and mining sectors, p. 12.

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

The used technologies shall allow real time video & audio:

- Execution of remote activities (between member and auditor). A minimum of 70% of the time must be allocated to video real time interaction with the member and their employees, with the remainder being used for document review.
- Site tour in real time when workers are operating, with pre-recording not being accepted as reliable compliance. Auditor will be the one setting the pace of the tour and 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 submitting them 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 approved lead auditors remotely and closely guiding facilitators on the ground in real-time. This is an efficient alternative if travel represents a prohibitive cost in relation to the time required on site or international travel restrictions apply but local attendance is still possible. The use of a facilitator will not be in lieu of an RJC approved 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 team¹⁹. The facilitator's purpose is to ensure that the audit process reaches a maximum credibility level.

Qualifications:

- The facilitator may be an employee, an auditor or a contractor of the CAB who is not an RJC approved 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 will have completed the RJC relevant training modules and successfully passed the assessments before the audit, except for interpreters.
- The facilitator shall have access and sufficient technical skills to utilise any required ICT, including video capabilities 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 below activities:

¹⁹ ISEAL Guidance – Remote Auditing Good Practices p. 11 [Remote Auditing Good Practices ISEAL Guidance v0.1 March 2021.pdf \(isealalliance.org\)](#)

- 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 environment 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 CAB's audit team.
- When using a facilitator, the communication with the virtual lead auditor shall be synchronic (as opposed to asynchronous) during at least 80% of the audit time.
- The facilitator can raise any concerns to the lead auditor during the audit.
- The CAB 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 also when facilitators are used.

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)) level CAB auditor who is not RJC approved but can qualify for the social elements of the audit, CABs are encouraged to apply for their RJC approval with a limited scope. This will eliminate the need for a lead auditor to supervise remotely and the associated cost.

c. Remote worker interviews on social topics

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

- Depending on the number of workers, a sample of up to 10 workers will be selected for interview and grouped as follows:
 - 5 workers selected: 2 workers for individual interviews and 3 workers for a group interview.
 - 10 workers selected: 2 workers for individual interviews and 2 groups of 4 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 4 workers can be converted to 4 individual interviews as per regular onsite procedure.

- For less than 5 workers selected, the auditor will decide on individual and group interviews proportion, keeping in mind workers' safety.
- Remote interviews must be conducted with video via worker personal phone 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 onsite workers to use their personal phone before conducting the interviews.
- Interview 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, canteen or even their home if they are working from home but cannot be an office room where the confidentiality through 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.
- Worker to show a 360° view of the area/room prior to the commencement of the interview (so that auditor can confirm it is the same room assessed in planning phase, the absence/covering of any CCTV equipment installed and any supervising personnel) and sit with their back towards the closed door so anybody entering can be seen. This will not apply to workers working from home.
- If workers do 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 if 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 onsite audit, the auditor shall start the interview with questions aiming to verify if the worker feels comfortable to proceed and to be in a confidential environment.
- The CAB shall also provide a 'grievance hotline' where 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 site 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 facilitator role in this context.

7.4. Audit reporting requirements

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