

# Audit Methods Policy

Textile Exchange enables certification using a range of audit methods which include hybrid and remote audits as well as the typical on-site audits. This procedure outlines core criteria for conducting all audit types that are part of the assurance process. It also outlines the criteria and suggested best practices to be followed by certification bodies for audit methods that depend on technology and digital data transfer, namely hybrid and remote audits. These audits require broader considerations for effective assurance including additional planning, technology accessibility and selection, consent, and data privacy and governance.

In some cases, criteria in this document reference or duplicate criteria from other policies including *ASR-101-V2.1 Accreditation and Certification Procedures for Textile Exchange Standards* and *CCS-102-V3.1 Content Claim Standard Certification Procedures* in an effort to bring all relevant criteria into a single location. This duplication will be resolved in upcoming revisions to those documents.

This policy was developed considering guidance in [Remote Auditing Good Practices, ISEAL Guidance v1.0, June 2021](#).

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## Section A – General Information

### A1. Implementation

The following implementation timelines apply:

- A1.1.1 The *Audit Methods Policy V1.0* is effective July 1, 2024, and may be used immediately.
- A1.1.2 The mandatory implementation date for *Audit Methods Policy V1.0* is **January 1, 2025**. All audits and assessments conducted on or after January 1, 2025 shall be conducted using *Audit Methods Policy V1.0*.

### A2. References

A2.1 All *organizations* are subject to the criteria of the following documents and it is essential that they are used alongside this document. All can be found at [TextileExchange.org/knowledge-center](https://TextileExchange.org/knowledge-center). Where a specific version of a document is referenced, this is to ensure clarity in referencing specific criteria and does not supersede mandatory implementation dates for future versions of the document.

- A2.1.1 [\*EU Regulation 2016/679 General Data Protection Regulation\*](#) (GDPR)
- A2.1.2 [\*ASR-101 Accreditation and Certification Procedures for Textile Exchange Standards\*](#) (“ASR-101”)
- A2.1.3 [\*CCS-101 Content Claim Standard\*](#) (“CCS-101”)
- A2.1.4 [\*CCS-102 Content Claim Standard Certification Procedures\*](#) (“CCS-102”)
- A2.1.5 [\*GRS-102 Global Recycled Standard Certification Procedures\*](#) (“GRS-102”)
- A2.1.6 [\*OCS-103 Policy for GMO Screening of Organic Cotton\*](#)
- A2.1.7 [\*RAF-102 Responsible Animal Fiber Certification Procedures\*](#) (“RAF-102”)
- A2.1.8 [\*RDS-102 Responsible Down Standard Certification Procedures\*](#) (“RDS-102”)
- A2.1.9 [\*ASR-112 Procedure for the Withdrawal of Certification Body Licensing\*](#)
- A2.1.10 [\*ASR-213 Materials, Processes, and Products Classification\*](#)
- A2.1.11 [\*TE-101 Terms and Definitions for Textile Exchange Standards and Related Documents\*](#)

## Section B – Certification Process Audits

The audits and requirements outlined in this section correspond to the different *audit types* that are carried out by the certification body throughout the certification process and certificate validity period to verify standard conformity and to issue or re-issue a certificate.

### B1. Audit Types

- B1.1** An audit shall be considered to be an *initial audit* if:
- B1.1.1** The organization has not been certified to the *Standard* in the past;
  - B1.1.2** The organization has been certified to the Standard in the past, but has not been certified to the Standard for 180 calendar days or more prior to the start of the audit, including time when the organization’s scope certificate was suspended;
  - B1.1.3** The audit is conducted because a scope certificate was not issued within 60 calendar days of an initial audit (see *ASR-101-V2.1*, D4.6.8); or
  - B1.1.4** The organization is changing certification bodies, excluding transfer audits (see *CCS-102-V3.1*, D2.9.1, and B1.4 of this document).
- B1.2** An audit shall be considered to be a *recertification audit* if it is conducted to renew the certification of a certified organization, with no more than a 180-calendar day gap in certification prior to the start of the audit.
- B1.2.1** Recertification audits should be completed no later than 60 calendar days prior to the expiry of a scope certificate (see *ASR-101-V2.1*, D4.4.20).
  - B1.2.2** Recertification audits may be conducted, as a maximum, up to 90 calendar days before the expiry of the previous scope certificate.
  - B1.2.3** If a certification decision is made prior to the expiry of the previous scope certificate, issuing the new scope certificate may then be delayed up to 90 calendar days after the audit date provided that the new scope certificate becomes valid on the anniversary date. In this case, the certification decision shall still be made within 60 calendar days of the audit, but the certification body may wait until the expiry of the previous scope certificate to issue the new scope certificate.
  - B1.2.4** If the recertification audit is conducted more than 90 calendar days before the expiry of the previous scope certificate, or if an early recertification is requested by the certified organization, the new scope certificate may be issued prior to the

expiry of the previous scope certificate, and the previous scope certificate withdrawn.

**B1.3** An audit shall be considered to be an *additional audit* if it is conducted for other purposes such as but not limited to expanding the scope of certification or meeting criteria regarding semi-announced or unannounced audits (excluding farm confirmation visits). This includes auditing to meet the following criteria:

**B1.3.1** Section B3 Semi-Announced and Unannounced Audits;

**B1.3.2** *CCS-102-V3.1*, D2.8 Amending the Scope of Certification;

**B1.3.3** *CCS-102-V3.1*, D3.2 Multi-site and Group Organizations; and

**B1.3.4** *RAF-102-V2.2*, D3.2 Auditing Farm Groups and Communal Farmer Groups.

**B1.4** A *transfer audit* is a simplified audit of a certified organization that is changing certification bodies under specific circumstances. Transfer audits shall be conducted as follows:

**B1.4.1** The certification body shall conduct a full audit of the organization, which may be conducted remotely.

**B1.4.2** The certification body may rely on the preceding certification body's findings to address criteria related to visual inspection or to documentation which has not changed since the audit, except where this relates to a non-conformity issued during the last audit.

**B1.4.3** The certification body shall issue a transferred scope certificate, which maintains the expiry date of the previous scope certificate issued by the preceding certification body. And

**B1.4.4** When a transfer audit has been conducted as part of the scope certificate transfer process, the certification body shall conduct an initial audit upon that scope certificate's next renewal.

NOTE: Transfer audits are only permitted under specific circumstances defined in [ASR-112 Procedure for the Withdrawal of Certification Body Licensing](#). See *ASR-101-V2.1*, D4.12 Transfer of Scope Certificates for details about other circumstances where a certified organization changes certification bodies.

**B1.5** An evaluation done by the certification body to ensure that non-conformities are addressed within the specified timelines may be conducted as part of an audit or separately from an audit. This type of evaluation may be conducted as an on-site, hybrid, or remote audit at the certification body's discretion except where otherwise specified in criteria.

## B2. Additional Audit Types for Farm Certification

Certified organizations certified to the Responsible Animal Fiber (RAF) standards (i.e. Responsible Wool Standard (RWS), Responsible Mohair Standard (RMS), and Responsible Alpaca Standard (RAS)) have scope certificates with validity of three years and require annual audits.

- B2.1** An audit shall be considered to be an *annual audit* if it is conducted to ensure that an RAF farm organization is audited annually, outside of initial and recertification audits. The criteria of *RAF-102* shall be met regarding annual audits.
- B2.2** A *confirmation visit* is an additional on-site evaluation of a *farm* where the auditor limits the evaluation to a visual check for specified criteria only. A confirmation visit is not considered to be an audit.

## B3. Semi-Announced and Unannounced Audits

*Semi-announced* and *unannounced audits* are on-site audits with specific planning and sampling criteria. These levels of *audit notice* are used to augment assurance integrity risk management at points of high-risk in the certification process or during specific material processing scenarios.

- B3.1** The following types of *audit notice* shall apply for audits and confirmation visits:
- B3.1.1** *Announced*, where the organization and facility are aware in advance of when the audit will be conducted;
- B3.1.2** *Semi-announced*, where one of the following options for notice are used, at the discretion of the certification body:
- a. The organization and *facility* receive up to 72 hours' notice (*farms*) or two calendar days' notice (all other facilities) of the audit, to ensure that the facility is open, and the correct people are available; or
  - b. For farms only, the organization and facility receive notice of a two-month window during which the visit will be conducted, but do not receive any additional notice prior to the auditor's arrival.
- B3.1.3** *Unannounced*, where the organization and facility receive less than one hour's notice of the auditor's arrival.
- B3.2** Semi-announced and unannounced audits shall always be conducted on-site.
- B3.3** The certification body shall conduct semi-announced audits and unannounced additional audits for at least 2% of sites and associated subcontractors which are evaluated to the CCS

with physical possession of claimed materials on an annual basis in accordance with the following:

- B3.3.1** The 2% shall be calculated per certification body for all facilities which are evaluated to the CCS.
- B3.3.2** Unannounced audits shall be conducted for at least 2% of facilities designated as high-risk from the risk assessment in *CCS-102-V3.1, D2.2*.
- B3.3.3** Semi-announced or unannounced audits shall be conducted for at least 1% of facilities designated as medium-risk and 0.5% of facilities designated as low-risk from the risk assessment in *CCS-102-V3.1, D2.2*. And
- B3.3.4** Remaining audits to complete the 2% threshold may be semi-announced or unannounced audits for facilities of any risk level.

NOTE: Criteria for semi-announced and unannounced auditing of *farms* are included in *RAF-102* and *RDS-102*.

- B3.4** Semi-announced and unannounced audits should occur during a period where there is greatest risk to the integrity of assurance (e.g. peak production period).
- B3.5** Semi-announced and unannounced audits shall be conducted in addition to initial and recertification audits and shall not be used in place of the annual recertification audit of a facility.
- B3.6** Priority to unannounced audits shall be given where *first processor*, recycler, social, and/or chemical criteria apply to the site. See also *GRS-102* for GRS audit criteria.
- B3.7** When selecting sites for semi-announced and unannounced audits, the certification body shall consider the following:
  - B3.7.1** The risk level assigned to sites (see *CCS-102-V3.1, D2.2*), with priority to higher risk sites;
  - B3.7.2** Obtaining a representative sample in terms of scope of certification, geography, and processing categories; and
  - B3.7.3** Prioritizing sites where there have been *complaints* or where there are other concerns with conformity.

NOTE: Complaints to consider in selecting sites may come in through a variety of channels, including complaints submitted to Textile Exchange or the accreditation body, or informal complaints received by the certification body.

- B3.8** The certification body shall conduct semi-announced or unannounced audits of specific sites when asked to do so by Textile Exchange or by the accreditation body. These audits may be counted towards the total number of required audits.
- B3.9** Textile Exchange and the accreditation body may participate in the semi-announced and unannounced audits, contact the site directly, or audit the site without the certification body physically present and/or without the certification body's knowledge at the time of the visit.
- B3.10** The certification body shall maintain records of all semi-announced and unannounced audits and shall submit those records to Textile Exchange upon request.
- B3.11** During a semi-announced or unannounced audit, the certification body shall, at minimum, evaluate the following as applicable to the site:
- B3.11.1** Volume reconciliation (*CCS-101-V3.1, C3*);
  - B3.11.2** Purchasing documentation (*CCS-101-V3.1, D2.3, D2.4, and D2.5*);
  - B3.11.3** Physical handling and inventory of claimed materials (inputs, processing, and outputs, including *CCS-101-V3.1, D3*);
  - B3.11.4** Transport and sale (*CCS-101-V3.1, D5*);
  - B3.11.5** On-product claims relating to the Standard which are present on-site, including when labeling is done on behalf of a customer;
  - B3.11.6** The following Standard-specific criteria:
    - a. For material recyclers, the physical possibility to produce input and output claimed materials, applicable government criteria, and the authenticity of reclaimed input material sources;
    - b. For GRS, social, chemical, and environmental criteria;
    - c. For OCS first processors, input product origin information, GMO testing criteria (see *OCS-103 Policy for GMO Screening of Organic Cotton*) for cotton, and traceability records back to the organic farm;
    - d. For RDS and RAF slaughter sites, animal welfare criteria;
    - e. Any areas where a non-conformity was issued during the previous full audit (certification or recertification audit);
    - f. Any areas where the certification body has identified additional risks for the specific site, including risks which have been identified through complaints or

which have been noted to the certification body by Textile Exchange or the accreditation body; and

- g. Financial records of certified input and output materials (*CCS-102-V3.1*, D2.1.2 and E2.1.1).

## Section C – Audit Methods

The *audit methods* criteria in Section C outline how certification bodies are expected to use different types of audit methods and auditing tools that uphold robust and consistent certification services offered across Textile Exchange standards.

### C1. General Criteria for All Audit Methods

- C1.1** Audits shall include evaluation by the certification body according to the criteria in *ASR-101* and the applicable certification procedures.
- C1.2** The certification body shall maintain documented procedures for hybrid and remote audits and shall conduct auditor training on these auditing protocols. The procedures may be specific to Textile Exchange standards or may also cover the certification body's other programs.
- C1.3** The certification body shall provide Textile Exchange with a copy of its procedures for hybrid and remote audits to [assurance@textileexchange.org](mailto:assurance@textileexchange.org) prior to conducting hybrid or remote audits, and upon request by Textile Exchange.
- C1.4** Portions of an audit which are limited to a review of documents and records may be conducted remotely even when an on-site or hybrid audit is required, provided that this is technically feasible to do and does not affect the integrity of the sampling process (e.g. by allowing the organization time to correct errors on documents before evaluation). This includes evaluation of any functions performed at an office facility with no physical possession of claimed materials.
- C1.5** The audit report shall specify when a hybrid or remote audit has been conducted.

### C2. On-Site Audit

- C2.1** When an on-site audit is conducted, the entire audit team shall be physically present at the facility being audited, with the exception of auditor trainees where hybrid or remote participation is permitted in *CCS-102-V3.1*, D1.1.3.
- C2.2** The certification body may replace a hybrid or remote audit with an on-site audit.



### C3. Hybrid Audit

A *hybrid audit* is an audit that is conducted through a combination of remote and on-site evaluation to verify conformity.

- C3.1** The certification body shall conduct an advance review with the organization to conduct the following activities:
  - C3.1.1** Ensure there is sufficient internet connectivity available to conduct remote portions of a hybrid audit;
  - C3.1.2** Record the list of criteria that will be assessed on-site and that will be assessed remotely; and
  - C3.1.3** Ensure that no other barriers to a hybrid audit are present.
- C3.2** Hybrid audits shall be conducted jointly by a qualified lead auditor (see *ASR-101-V2.1*, D3.1.5) who is working remotely, and by an on-site *audit facilitator*, who represents the certification body.

NOTE: *CCS-102-V3.1* uses the term “on-site representative” to refer to the audit facilitator.

- C3.3** The lead auditor shall be present remotely for the entire audit and shall maintain responsibility for conformity to hybrid audit criteria.
- C3.4** The audit facilitator in a hybrid audit:
  - C3.4.1** Shall be a qualified auditor with the certification body (for any standard), or an auditor trainee for the Standard who has completed the criteria of *ASR-101-V2.1*, D3.1.5.a, b, c, and d;
  - C3.4.2** Shall ensure that audit procedures are followed under the lead auditor’s direction (e.g. areas of the facility are not missed on the site tour, management representatives are not present for worker interviews);
  - C3.4.3** Shall be independent of the organization being audited;
  - C3.4.4** Shall, at a minimum, have received training on general auditing practice, impartiality, and any technology which is used to conduct the audit;
  - C3.4.5** May also act as a language interpreter for the lead auditor;
  - C3.4.6** May conduct auditing tasks under the lead auditor’s supervision, if appropriate to their qualifications; and

- C3.4.7** Shall be responsible for managing the technology for capturing video of the audit (managing the video recording device).
- C3.5** A live video, including a full video tour of the site, shall be used throughout the hybrid audit (i.e. video calling or a similar technology), where the audit facilitator is responsible for managing the video device.
- C3.6** For farm audits, a live video tour of the site may be replaced with a video recording of the farm which is taken by the audit facilitator during the audit, and where the lead auditor reviews the video and has the opportunity to request additional footage before the closing meeting.

## C4. Remote Audit

A *remote audit* is an audit of a certified organization where no certification body personnel are present on-site. Remote audits may include offline (e.g. document review) or real-time virtual (e.g. video calls) approaches, or combinations thereof. When a remote audit is conducted, the audit team participates in the audit remotely rather than being present on site.

Remote audits require additional planning and preparation time. Auditors will require more flexibility and adaptability in audit plans because of a greater risk for misunderstanding through virtual communication tools (particularly considering language interpretation factors when applicable). Audit participants may be affected by using digital tools for extended periods and this may impact the number of needed breaks during the audit.

- C4.1** For processing facilities, the remote audit shall be conducted by an auditor who has visited the site in the past where possible. Where this is not possible, the auditor shall be briefed in advance by an auditor who has visited the site in the past. If neither of these options are possible, the audit shall instead be conducted as a hybrid or on-site audit.
- C4.2** The certification body shall conduct an advance review with the organization to carry out the following remote audit planning and preparation activities:
  - C4.2.1** Maintain records and/or checklists of the remote audit pre-assessment planning activity that document the completion of steps in this section.
  - C4.2.2** Assess technical and operational capacity to conduct remote audits to ensure that both the certified organization and the certification body can conduct this audit type given existing resources and available technology for the planned audit location.
  - C4.2.3** Confirm the availability of key staff for the audit and request that the organization identify the people to be audited and ensure their availability at defined times.

- C4.2.4** Define and become familiar with the types of information and communication technology that will be used to conduct the audit.
- C4.2.5** Identify the different sources of data needed for the audit and consider data privacy, reliability of data, how information will be transmitted, and how its privacy or security will be protected (see C5.4).
- C4.2.6** Assess the level of data accessibility for the audit before the remote audit is accepted, and agree on a secure and confidential data transmission method.
- C4.2.7** Define the agenda for the audit including the below information, and share it with the organization at least five days before the audit:
  - a. Roles and responsibilities of audit participants;
  - b. A list of the planned activities, documents, and records that will be requested;
  - c. Indication of the secure document storage software to be used; and
  - d. A request to confirm appropriate platforms for communication.
- C4.2.8** Conduct an initial call to test internet and other connectivity needed for digital audit tools (e.g. video recording) and to ensure audit participants know how to use the tools. And
- C4.2.9** Define a contingency plan for the audit should the technology or connectivity plans fail during the scheduled audit time.
- C4.3** The certification body may request completion of a form in advance of the remote audit that facilitates planning and execution of the audit. The form may include information such as:
  - C4.3.1** Time zone in which the audit will be conducted;
  - C4.3.2** Whether the audit should be split over a number of days or specific time periods;
  - C4.3.3** Confirmation of the online conference technology platform used;
  - C4.3.4** Whether documents and records are all available in digital form; and
  - C4.3.5** The arrangement for a date for an initial test call.
- C4.4** For facilities with physical possession of claimed material, a live video, including a full video tour of the site, shall be used throughout the remote audit (i.e. video calling).

- C4.5** For farm audits, a live video tour of the site may be replaced with a video recording of the farm which is taken during the audit, and where the lead auditor reviews the video and has the opportunity to request additional footage before the closing meeting.
- C4.6** The certification body shall undertake the following activities to ensure the integrity and confidentiality of information gathered from workers and *vulnerable individuals* during a remote audit, particularly for the evaluation of social criteria:
- C4.6.1** The certification body shall ensure that the technology and tools allow auditors to confirm the identity of the interviewee while maintaining anonymity of workers during interviews, including data that may identify groups or individuals. The organization shall not record the interview themselves.
- C4.6.2** Upon receiving consent from the interviewee, the certification body shall use video calling to see the facial expression and body language of the auditees and ensure interviews can be conducted in confidence, since video can provide information in the interview environment.
- C4.6.3** The certification body shall take steps to minimize risks to the organization’s workers by ensuring the organization communicates to the workers in a clear way to enable them to make informed decisions about participating in the audit process. This shall include ensuring that workers are aware that they may decline to participate in interviews for social criteria without fear of reprisals. And
- C4.6.4** The certification body should verify that the organization has the following information to support worker trust and confidentiality during the remote audit process:
- a. The certification body shall assess the extent to which a remote audit may harm workers, paying particular attention to vulnerable rightsholders (e.g., confidentiality). The certification body should encourage the organization to do the same.
  - b. The certification body shall allow the organization to include protocols for anonymity, confidentiality, and privacy of workers.
  - c. The certification body shall allow the organization to include a way to connect with individual workers, such as through unique identification numbers, to enable follow-up if any significant rights issues are raised or discovered.
  - d. The certification body shall encourage the organization to share information with workers about how workers are compensated for work time during the audit and the steps to be taken to avoid retaliation if the use of this time for the audit is not anticipated. And

- e. The certification body shall confirm that the organization provides workers with a confidential phone number, e-mail, or digital communication line to contact the auditor as a supplemental measure. This allows workers to contact the auditor independently of the organization's management.

## C5. Best Practices for Hybrid and Remote Audits

The information in this section details recommended best practices for conducting audits, which are recommended but not mandatory. The criteria in this section do not replace the certification body's responsibility to comply with all applicable legislation such as for data privacy. The word "audit" in this section refers to any audit which is conducted partially or fully as a hybrid or remote audit.

### C5.1 Documentation in Preparation for a Hybrid or Remote Audit

The certification body should notify the organization of the following at least ten calendar days in advance of the audit:

- C5.1.1 A list of documents to be provided by the organization in advance of the audit; and
- C5.1.2 A summary of sampling methods, date by which information is needed, and facilities to be audited.

### C5.2 Audit Duration and Schedule

The certification body should consider the below audit duration and schedule guidelines in planning hybrid and remote audits:

NOTE: The distribution of time spent on hybrid and remote audit activities will differ from on-site audits, with more time on audit planning and potentially longer duration overall for the remote audit. It is typical that remote audit preparation activities can take up to 30% of total audit time.

- C5.2.1 The certification body should allocate the audit effort (hours) differently, focusing more on the preparatory steps, and enabling more focused interaction with the organization.
- C5.2.2 If an audit requires much more time than an on-site audit, the certification body should consider this in initial risk assessments on the feasibility of a hybrid or remote auditing approach (see *CCS-102-V3.1, D2.3*).
- C5.2.3 The certification body should consider time zone differences with the organization being audited and consider whether the audit may have to be split into two or more parts. And

- C5.2.4** The certification body may consider a variation in the timeframe to conduct the audit and fragmentation of activities spread over the course of a longer period of time (e.g. four hours per day for three days).

### **C5.3 Selecting Technology for a Hybrid or Remote Audit**

The certification body should undertake the following activities to select the most appropriate technology for conducting the remote audit:

NOTE: Making the right choice of which online conferencing tool to use may depend less on certification body preferences and more on what works best for the organization. This can depend on which platform the organization has access to, geographical context, digital bandwidth, and connectivity. There is a chance that cultural contexts and remoteness of location will also play a factor. Auditors should not assume that everyone will have the same comfort level being recorded on camera.

- C5.3.1** The certification body should inform the organization and their audit personnel about the chosen technology for the remote audit and ensure their understanding of how the chosen technology will be used and of the needed competence to use the technology.
- C5.3.2** The certification body should include critical considerations around data collection (consent), storage (personal data), and use (privacy, security) when choosing a technology for the remote audit. And
- C5.3.3** The certification body may use advanced technologies which provide a better view of the site than a simple camera (e.g. 360° camera) where these are available and feasible.

### **C5.4 Managing Data During a Remote Audit**

The certification body should undertake the following activities to ensure data accessibility, data privacy and consent, and data security measures are taken in consideration for conducting the remote audit:

NOTE: The reality of remote audits expands the nature and type of information gathered from organizations in the certification process. As a result, the certification body should ensure that the organization is aware and prepared to provide the information necessary to conduct the audit process.

#### **C5.4.1 Data Accessibility**

- a. The certification body should regularly review client contract or agreement templates to determine if these need to be revised to accommodate new data sharing requests and data formats needed for remote audits.

- b. The certification body should ensure that they capture recordings of audit evidence in line with client contractual agreements to respect information confidentiality and proprietary rights of the client.
- c. When the organization does not want to send records or documents in advance of the audit or the certification body does not want them to, these documents may be reviewed during the audit via screen sharing to reduce the amount of data and information that must be transferred between the certification body and the organization.
- d. Screenshots and recordings during the audit should only occur upon explicit consent of the auditee.
- e. Where real-time streaming or recording occurs, the certification body should require the auditee to sign consent forms available in the local language(s) in advance of the audit.
- f. While the audit is taking place, the auditor should request that documents are submitted within a two-hour timeframe.
- g. The certification body auditor should make efforts to confirm what was heard, stated, and read throughout the audit. And
- h. The certification body should only take photos during the audit upon receiving consent from the auditee and any other relevant involved parties. Similarly, recording of videos or audio material should only be done upon receiving consent from the involved parties.

#### **C5.4.2 Data Privacy and Consent**

The certification body should comply with the [\*EU Regulation 2016/679 General Data Protection Regulation\*](#) (GDPR) and other applicable national data protection and sharing laws, which should include the following:

- a. Minimizing the collection and use of personal data (often referred to as data that could identify an individual or natural person);
- b. Requesting consent from individuals for the specific uses of information they are collecting from those individuals; and
- c. Conducting due diligence to identify and assess the personal data the certification body processes, while only collecting personal data that is required for execution of essential activities.

### **C5.4.3 Data Security**

- a. The certification body should take measures to ensure that interviews for social criteria are conducted without the presence or observation of the organization's management. And
- b. The certification body should ensure that anyone handling (collecting, storing, analyzing) data related to the audit process has adequate security practices in place to maintain the integrity, access permissions, and confidentiality of the data in accordance with their data governance policy and with the data governance practices of the client.

## **C5.5 Hybrid and Remote Audit Reporting**

The certification body should undertake the below activities to ensure remote audit reporting provides the required data and information for effective certification decision-making:

NOTE: Since the nature and format of data and information collected through the audit is likely to be quite different from the on-site audit process, consideration should be given to how additional information will be captured and reported, and any implications for data privacy and confidentiality.

- C5.5.1** The certification body should consider how the audit report format needs to change for remote audits and what additional information is required to be included to ensure assurance integrity according to Textile Exchange criteria.
- C5.5.2** The certification body may include an “unable to rate” option in certification decision-making in the case that insufficient data is available to make a certification decision. In this case, no certification may be granted without additional auditing.
- C5.5.3** The certification body should record information in the remote audit report on the following:
  - a. Which methodologies and tools were used to collect evidence during the remote audit; and
  - b. Which standard criteria (if any) indicators were not evaluated.
- C5.5.4** The certification body should capture the time and geo-reference links of any interview locations in the remote audit report.
- C5.5.5** Once the audit is complete, the auditor should delete any documented information or records that do not need to be retained.



- C5.5.6** The certification body should have procedures in place for how to gather information from remote locations where internet or cellular access may be limited.
- C5.5.7** The certification body should consider whether any new system criteria limit accessibility to their program, particularly from *vulnerable individuals*. Considerations regarding accessibility may include:
- a. Carefully evaluating the conditions of using hybrid or remote audits (based on stakeholder group);
  - b. Evaluating entry barriers like technology accessibility and cost; and
  - c. Evaluating inherent discrimination from client risk assessments (e.g. whether risk profiles are potentially discriminating against specific countries or stakeholder groups).

## Appendix A – Definitions

Refer to *TE-101 Terms and Definitions for Textile Exchange Standards and Related Documents* for definitions of terms used in these procedures. Key definitions are included below. Defined terms are shown in *italics* in the first usage in this document, and in some other uses for clarity.

**Additional Audit:** An *audit* which is conducted for purposes other than those of an *initial audit*, *recertification audit*, *annual audit*, or *transfer audit*.

**Annual Audit:** An *audit* which is conducted during the validity period of a scope certificate to ensure that an *organization* is audited annually. Applicable to RAF *farm* certification only.

**Audit Facilitator:** A representative of the *certification body* who is physically present at the auditee *facility* for the *audit*.

**Audit Method:** The way that an *audit* is conducted in terms of the audit team’s presence at the auditee *facility* or not, such as an *on-site audit*.

**Audit Notice:** The advance notice of the time and date of an audit provided to the certified organization and the facility to be audited, such as an *announced audit*.

**Audit Type:** Classification of *audits* based on the purpose of the audit, such as an *initial audit*.

**Confirmation Visit:** The site receives minimal notification of the visit. Limited to a visual check for conformity to animal welfare, land management, and social welfare requirements (as applicable) only. Done in addition to full audits.

**Hybrid Audit:** An audit that is conducted through a combination of on-site and remote evaluation, where an on-site *audit facilitator* assists the remote *auditor(s)*.

**Initial Audit:** The first audit of an organization performed by a certification body for the standard. If an organization has a gap in certification of over 180 calendar days, any audit after this period would be an initial audit.

**On-Site Audit:** An *audit* where the *auditor(s)* is/are physically present at the auditee facility for the audit.

**Recertification Audit:** An *audit* to renew the certification of an *organization*.

**Remote Audit:** An *audit* where the entire audit team is not physically present at the auditee facility for the audit.

**Transfer Audit:** A simplified *audit* of a *certified organization* that is changing certification bodies under specific circumstances.

**Vulnerable Individual:** An individual from a group or population that may be at heightened risk of becoming vulnerable or marginalized, including Human Rights defenders, political dissidents, women, young people, minorities, and Indigenous Peoples.

Vulnerability is therefore not limited to discrimination and can manifest as a heightened risk for several harms (e.g. bodily integrity, psychological safety, economic exclusion). Vulnerability is also context-specific, as someone may possess a privileged identity in one context that is marginalized in another. Finally, vulnerability is intersectional, as possessing multiple vulnerable attributes may compound impacts on a rightsholder (e.g. a migrant woman).