

COVID-19 Relevance and High-Level Guidance

This document is a guidance for findings that *could* be found during audit that are related to COVID-19 and its effects and should be read in conjunction with an amfori BSCI audit. This document has been created based on review of the #COVID findings and should be considered as high level guidance to understanding how the amfori BSCI System Methodology applies to COVID-19 conditions and should not be considered a check list for understanding audit results.

Every finding on an audit must be fully justified by the auditor, supported by evidence and situated against local law and culture. In the event that any member wishes clarification on any finding, in the first instance please reach out to the approved amfori BSCI auditing company who completed the audit.

As a reminder

- A **finding** is a serious breakdown or nonexistence of positive evidence supporting an amfori performance area question (PA).
- A **partial finding** is when there is not a breakdown of a system, but certain areas are ambiguous, not understood or not always being followed by all.
- **Observations** are an especially important tool for auditors to use. These could be an observation that a legal event such as an upcoming national pay rise is due in four weeks. This is an observation that is valuable to the producer and RSP holder concerning the need for change to stop the producer moving into a non-compliant state.
- A **Good Practices** observation should be best practices that goes *far* beyond the amfori CoC or legal requirements.
- **Zero Tolerance** issues are to be treated as per the requirements of amfori System Manual Annex 5.

amfori has provided a link to potentially relevant training provided on the amfori Academy which is available for members and producers. If the link is not working or applicable you can search the amfori academy using the course titles to identify the training.

Please continue to check the Resources section on the amfori website for up to date information, or reach out your local Network Representative (www.amfori.org/content/local-networks) or info@amfori.org

PA / Section	Question	COVID-19 Relevance and high level guidance	Available Training
Performance area 1 Social management systems and the cascade effect			
1.1	Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?	All producers must have a social management system in place, that when required reflects how the impact of COVID-19 is managed	<ul style="list-style-type: none"> • Social Management Systems (workshop) • Social Management Systems (e-learning)
1.2	Is there satisfactory evidence that a senior manager has been appointed to ensure that the amfori BSCI values and principles are followed in a satisfactory manner?	All producers must have an ultimate senior person in charge and responsible of the social management system. The senior person must have the power to make any necessary changes.	
1.3	Is there satisfactory evidence that the auditee has a good overview of the significant business partners and their level of alignment with the amfori BSCI Code of Conduct?	All significant business partners are made aware of the producers' expectations of safety concerning COVID-19. All significant business partners are aware that if there is an outbreak of Covid-19 in the workplaces this information is passed onto the producer	
1.4	Is there satisfactory evidence that the auditee's workforce capacity is properly organised to meet the expectations of the delivery order and/or contracts?	Performance area PA 6,7 and 11 are the most relevant connected PA's to this question. Other performance areas should not be excluded if relevant.	
1.5	Is there satisfactory evidence that the auditee monitors how its business partners observe the amfori BSCI Code of Conduct?	Related to question 1.3	
1.6	Is there satisfactory evidence that the auditee has developed the necessary policies and processes to prevent and address any adverse human rights impacts that may be detected in its supply chain?	Related to question 1.3	

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1.7	Is there satisfactory evidence that the auditee manages its business relations in a responsible manner?	Related to question 1.3	
Performance area 2 Worker involvement and protection.			
2.1	Is there satisfactory evidence that the auditee has good management practices that involve workers and their representatives in sound information exchange on workplace issues?	The factory has an obligation to ensure workers are aware of national guidelines for COVID -19 management, such as social distancing and hand washing. This should be considered a finding if the factory has not communicated public safety information effectively to the workers, but an observation if they have and workers do not comply	<ul style="list-style-type: none"> • Grievance Mechanism and Worker Involvement
2.2	Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?	As 2.1	
2.3	Is there satisfactory evidence that the auditee takes specific steps to make workers aware of their rights and responsibilities?	As 2.1	
2.4	Is there satisfactory evidence that the auditee builds sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation?	As 2.1	
2.5	Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?	Workers are made aware of the producer grievance process and how to use the process, all COVID -19 grievances must be reviewed and investigated as top priority issues. Communities concerned with the operations of the producer are kept informed of COVID-19 awareness and issues the producer may have concerning outbreaks of COVID 19 within is sphere of operations.	
Performance area 3 Freedom of Association and Collective Bargaining.			
3.1	Is there satisfactory evidence that the auditee respects the right of workers to form unions in a free and democratic way?	Related to PA 2	none
3.2	Is there satisfactory evidence that the auditee respects workers' right to bargain collectively?	Related to PA 2	
3.3	Is there satisfactory evidence that the auditee does not discriminate against workers because of their trade union membership?	Related to PA 2	
3.4	Is there satisfactory evidence that the auditee does not prevent workers representatives from accessing or interacting with workers in the workplace?	Workers freely elected representatives must be given access to workers when interactions concerning COVID -19 issues discussion is needed.	
Performance are 4 No Discrimination			
4.1	Is there satisfactory evidence that the auditee takes the necessary measures to avoid or eradicate discrimination in the workplace?	There must be no COVID-19 discrimination on the basis of sex, race, religion, language, nationality, disability, migrant status, sexual orientation, gender identity or membership in a social group facing marginalization/stigma.	none
4.2	Is there satisfactory evidence that the auditee takes the necessary preventative and/or remedial measures to ensure workers are not disciplined, dismissed or otherwise discriminated against because of their complaints against infringements of their rights?	There must be no discrimination of workers who were found to have been infected by COVID-19 and recovered during the recruitment period or on return to work after suffering	
4.3	Is there satisfactory evidence the auditee takes the necessary preventative and/or remedial measures so workers are not harassed or disciplined on grounds of discrimination as listed in the amfori BSCI Code?	Related to 4.1 and 4.2	
Performance area 5 Fair Remuneration			
5.1	Is there satisfactory evidence that the auditee complies with the government's minimum wage legislation or the industry standard approved through collective bargaining?	At least government or collective bargained minimum wages must be paid to all workers during the COVID-19 pandemic	
5.2	Is there satisfactory evidence that wages are paid in a timely manner; regularly and fully in legal tender?	Wages must be paid in full (or reduced if mandated by government) on time and in full. All Wages information must be relayed to workers in a format that all workers understand.	

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5.3	Is there satisfactory evidence that the level of wages reflects the skills and education of workers?	Not a relevant question in relation to COVID-19	<ul style="list-style-type: none"> • Fair Remuneration and Decent Working Hours - Workshop
5.4	Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?	Not a relevant question in relation to COVID-19	
5.5	Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted?	Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted? All legally mandated benefits must be paid in full.	
5.6	Is there satisfactory evidence that the auditee ensures that deductions are only taken under the conditions and to the extent prescribed by the law?	Not a relevant question in relation to COVID-19	
Performance area 6 Decent working hours			
6.1	Is there satisfactory evidence that the auditee does not require more than 48 regular working hours per week, without prejudice to the exceptions recognised by the ILO?	Workers are not required to work more than 48 regular working hours per week or national laws whichever gives most protection to workers, without prejudice to the exceptions recognised by the ILO? Especially when one of the effects of COVID-19 is known to be fatigue.	<ul style="list-style-type: none"> • Fair Remuneration and Decent Working Hours - Workshop
6.2	Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?	The auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct? Whatever gives the workers the most protection. The code or legal requirements.	
6.3	Is there satisfactory evidence that the auditee grants workers the right to resting breaks in every working day?	Is there satisfactory evidence that the auditee grants workers the right to resting breaks in every working day? More if mandated by labour law	
6.4	Is there satisfactory evidence that the auditee grants workers the right to at least one day off in every seven days?	Is there satisfactory evidence that the auditee grants workers the right to at least one day off in every seven days? More if mandated by labour law.	
Performance area 7 Occupational Health and Safety			
7.1	Is there satisfactory evidence that the auditee observes applicable occupational health and safety regulations applicable for its activities?	Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities? It should be noted by auditors that most H&S labour laws cover at least 20 of the PA 7 questions and requirements.	<ul style="list-style-type: none"> • Risk Assessment e-learning • Introduction to Occupational Health and Safety - Workshop • Building Safety and Fire Safety - Workshop
7.2	Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes?	Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes? If applicable this protection must meet national requirements.	
7.3	Is there satisfactory evidence that the auditee regularly carries out risk assessments for safe, healthy and hygienic working conditions?	Is there satisfactory evidence that the auditee regularly carries out risk assessments for safe, healthy, and hygienic working conditions? These risk assessments must include COVID-19 risk assessments and actions.	
7.4	Is there satisfactory evidence of active cooperation between management and workers (and/or their representatives) when developing and implementing systems towards ensuring OHS?	Is there satisfactory evidence of active cooperation between management and workers (and/or their representatives) when developing and implementing systems towards ensuring OHS? This cooperation must include cooperation concerning COVID-19.	
7.5	Is there satisfactory evidence that the auditee regularly provides OHS trainings to ensure workers understand the rules of work, personal protection and measures for preventing and reacting to injury to themselves and fellow workers?	Is there satisfactory evidence that the auditee regularly provides OHS trainings to ensure workers understand the rules of work, personal protection and measures for preventing and reacting to injury to themselves and fellow workers? This training must include COVID-19 awareness.	
7.6	Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?	Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?	
7.7	Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?	Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?	
7.8	Is there satisfactory evidence that the auditee has developed and implemented accident and emergency procedures?	Is there satisfactory evidence that the auditee has developed and implemented accident and emergency procedures? These procedures must include COVID-19 procedures	
7.9	Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?	Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?	
7.10	Is there satisfactory evidence that the auditee has and properly uses procedures and systems	Is there satisfactory evidence that the auditee has and properly uses procedures and systems for reporting and recording occupational	

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	for reporting and recording occupational accidents and injuries?	accidents and injuries? These must include COVID-19 related accidents and injuries.	
7.11	Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?	Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe? If outside certification is required, then this should be in place.	
7.12	Is there satisfactory evidence that the auditee respects the workers' right to remove themselves from imminent danger without seeking permission?	Is there satisfactory evidence that the auditee respects the workers' right to remove themselves from imminent danger without seeking permission? This is a fundamental human right.	
7.13	Is there satisfactory evidence that the auditee makes sure a competent person periodically checks the electrical installations and equipment?	Is there satisfactory evidence that the auditee makes sure a competent person periodically checks the electrical installations and equipment?	
7.14	Is there satisfactory evidence that the auditee has installed an adequate amount of properly working firefighting equipment?	Is there satisfactory evidence that the auditee has installed an adequate amount of properly working firefighting equipment?	
7.15	Is there satisfactory evidence that the auditee ensures that escape routes, aisles and emergency exits in the production site are not blocked, easily accessible and clearly marked?	: Is there satisfactory evidence that the auditee ensures that escape routes, aisles and emergency exits in the production site are not blocked, easily accessible and clearly marked?	
7.16	Is there satisfactory evidence that the auditee ensures evacuations plans meet legal requirements and that these plans are posted in relevant places so workers can see and understand them?	Is there satisfactory evidence that the auditee ensures evacuations plans meet legal requirements and that these plans are posted in relevant places so workers can see and understand them?	
7.17	Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?	Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?	
7.18	Is there satisfactory evidence that the auditee ensures qualified first-aid is available at all times?	Is there satisfactory evidence that the auditee ensures qualified first aid is available at all times? First aiders must be COVID-19 aware and given correct PPE	
7.19	Is there satisfactory evidence that the auditee has emergency procedures, in writing, to deal with cases of trauma or serious illness?	Is there satisfactory evidence that the auditee has emergency procedures, in writing, to deal with cases of trauma or serious illness? This must include COVID-19 related emergencies.	
7.20	Is there satisfactory evidence that the auditee provides workers with potable water at all times?	Is there satisfactory evidence that the auditee provides workers with potable water at all times? COVID safe processes must be in place.	
7.21	Is there satisfactory evidence that the auditee provides workers with access to an appropriate, clean area for storing food, eating and/or cooking?	Is there satisfactory evidence that the auditee provides workers with access to an appropriate, clean area for storing food, eating and/or cooking?	
7.22	Is there satisfactory evidence that the auditee provides workers with clean washing facilities, changing rooms and toilets that are also respectful of local customs?	Is there satisfactory evidence that the auditee provides workers with clean washing facilities, changing rooms and toilets that are also respectful of local customs?	
7.23	Is there satisfactory evidence that the auditee provision of transportation to workers is safe and complies with national regulations?	Is there satisfactory evidence that the auditee provision of transportation to workers is safe and complies with national regulations? All transportation must be COVID-19 safe	
7.24	Is there satisfactory evidence that the auditee has chosen the location of the social facilities or workers housing to ensure occupants are not exposed to natural hazards or affected by the operational impacts of the worksite (for example noise, emissions or dust)?	Is there satisfactory evidence that the auditee has chosen the location of the social facilities or workers housing to ensure occupants are not exposed to natural hazards or affected by the operational impacts of the worksite (for example noise, emissions or dust)? COVID-19 exposure should also be taken into account.	
7.25	Is there satisfactory evidence the auditee verifies that temperature, humidity, space, sanitation, illumination are adequate for the health and safety of workers?	Is there satisfactory evidence the auditee verifies that temperature, humidity, space, sanitation, illumination is adequate for the health and safety of workers? COVID -19 should also be taken into account	
Performance area 8 Child Labour			
8	Child labour is a Zero Tolerance issue in a producer's facility COVID-19 should not affect this performance area.		
Performance area 9: Special protection for young workers			
9.1	Is there satisfactory evidence that the auditee ensures that young persons do not work at night and are protected against conditions of work which are prejudicial to their health, safety, morals and development?	Is there satisfactory evidence that the auditee ensures that young persons do not work at night and are protected against conditions of work which are prejudicial to their health, safety, morals and development?	<ul style="list-style-type: none"> <u>Workshop: Young Worker Management</u>
9.2	Is there satisfactory evidence that young workers' working hours do not prejudice their attendance at school, their participation in	Not a relevant question in relation to COVID-19	

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	vocational orientation approved by the competent authority or their capacity to benefit from training or instruction programmes?		
9.3	Is there satisfactory evidence that the auditee has established the necessary mechanisms to prevent, identify and mitigate harm to young workers?	Is there satisfactory evidence that the auditee has established the necessary mechanisms to prevent, identify and mitigate harm to young workers? Including COVID-19	
9.4	Is there satisfactory evidence that the auditee seeks to ensure young workers have access to effective grievance mechanisms?	Is there satisfactory evidence that the auditee seeks to ensure young workers have access to effective grievance mechanisms?	
9.5	Is there satisfactory evidence that the auditee seeks to ensure that young workers are properly trained on OHS and have access to related training programmes?	Is there satisfactory evidence that the auditee seeks to ensure that young workers are properly trained on OHS and have access to related training programmes?	
9.6	Is there satisfactory evidence that the auditee has a good overview of all young workers engaged in its production site?	Is there satisfactory evidence that the auditee has a good overview of all young workers engaged in its production site?	
Performance area 10: No precarious employment			
10.1	Is there satisfactory evidence that auditee employment relationships are not precarious for the workers?	Performance area PA 2 questions 1,2,3 and 4 cover relevant COVID-19 awareness	none
10.2	Is there satisfactory evidence that the auditee engages workers based on recognised and documented employment relationships?	Performance area PA 2 questions 1,2,3 and 4 cover relevant COVID-19 awareness	
10.3	Is there satisfactory evidence that the auditee provides workers with understandable information before entering into employment?	Performance area PA 2 questions 1,2,3 and 4 cover relevant COVID-19 awareness	
10.4	Is there satisfactory evidence that the auditee does not use employment arrangements in a way that deliberately conflicts with the genuine purpose of the law?	Performance area PA 2 questions 1,2,3 and 4 cover relevant COVID-19 awareness	
Performance area 11: No bonded labour			
11.1	Is there satisfactory evidence that the auditee does not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour?	Not a relevant question in relation to COVID-19	<ul style="list-style-type: none"> • Forced Labour and Modern Slavery - Video Series
11.2	Is there satisfactory evidence that the auditee acts rigorously and diligently when engaging and recruiting migrant workers both directly and indirectly?	Is there satisfactory evidence that the auditee acts rigorously and diligently when engaging and recruiting migrant workers both directly and indirectly? This also includes COVID-19 testing and awareness.	
11.3	Is there satisfactory evidence that the auditee does not subject workers to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse?	Not a relevant question in relation to COVID-19	
11.4	Is there satisfactory evidence that the auditee has established all applicable disciplinary procedures in writing and has explained them verbally to workers in clear and understandable terms?	Is there satisfactory evidence that the auditee has established all applicable disciplinary procedures in writing and has explained them verbally to workers in clear and understandable terms? This requirement can be related to PA 7 COVID-19 awareness	
Performance area 12: Protection of the environment			
12.1	Is there satisfactory evidence that the auditee continuously identifies the significant impacts and environmental implications associated to its activity?	Is there satisfactory evidence that the auditee continuously identifies the significant impacts and environmental implications associated to its activity? Especially related to COVID-19	none
12.2	Is there satisfactory evidence that the auditee has procedures in place to ensure integration of local environmental law into the business model?	Not a relevant question in relation to COVID-19	
12.3	Is there satisfactory evidence of the auditee's required environmental permits and licences?	Is there satisfactory evidence of the auditee's required environmental permits and licences?	
12.4	Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?	Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?	
12.5	Is there satisfactory evidence that water is managed in a way that respects the environment, particularly but not limited to preserving local water sources?	Is there satisfactory evidence that water is managed in a way that respects the environment, particularly but not limited to preserving local water sources?	
Performance area 13: Ethical business behaviour			
13.1	Is there satisfactory evidence that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise?	Not a relevant question in relation to COVID-19	<ul style="list-style-type: none"> • Ethical Business Behaviour – Reacting to

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13.2	Is there satisfactory evidence that the auditee keeps accurate information regarding its own activities, structure and performance?	Is there satisfactory evidence that the auditee keeps accurate information regarding its own activities, structure and performance? COVID-19 information could be relevant to all performance areas where actions required to tackle COVID-19	Zero Tolerance alerts - Online
13.3	Is there satisfactory evidence that the auditee takes the necessary measures to not being involved in falsifying information related to its activities, structure and performance; nor in any act of misrepresentation of its supply chain?	Not a relevant question in relation to COVID-19	
13.4	Is there satisfactory evidence that the auditee collects, uses and otherwise processes personal information with reasonable care and in accordance with privacy and information security laws and regulatory requirements?	Not a relevant question in relation to COVID-19	

End