



GoodWeave International

Assurance Public System Report

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1. Assurance System Structure

GoodWeave is an organization working to end child labour in the carpet industry and to replicate its market-based approach in other sectors. GoodWeave operates as a network of organizations based in India, Nepal, Afghanistan, Germany, the UK and USA. The scheme owner of the GoodWeave system is GoodWeave International (GWI), which is a legal entity registered in the United States of America. The overarching organizational structure of the GoodWeave system is depicted in Appendix 1.

Standards

The GoodWeave program currently uses a single certification standard, the *GoodWeave Generic International Standard for Rug Producers* (current version 3.0, dated January 2016), which is available at www.goodweave.org/standard.

Certification Division

The GWI Certification Division (GWI-CD) is the certification body for GoodWeave globally. GoodWeave currently operates a single certification body, which complies with ISO 65/17065 and is assessed by a third-party accreditation organization. In 2013 this was conducted by Social Accountability Accreditation Services (SAAS) and in 2016 it was conducted by International Organic Accreditation Services (IOAS). Oversight of the GWI-CD is provided by the Certification Committee (CC) and Oversight Committee (OC).

System Review and Improvement

The assurance system is reviewed as part of the annual GWI-CD Management Review. Because there is a single certification body in the GoodWeave system, the overall system is reviewed alongside the performance of the certification body for greater efficiency. The GWI Secretariat monitors the performance of GWI-CD and the overall assurance system on an ongoing basis through regular communication, participating in CC/OC meetings and regularly reviewing GWI-CD records and documentation. The GoodWeave Secretariat identifies risks in the assurance system and ways to mitigate those risks during the regular and ongoing reviews of the system. Where areas for improvement are identified, these are brought to the attention of the Executive Leadership Team and Board for decision-making on any necessary changes to the system.¹

Stakeholder Engagement

During GoodWeave audits/inspections the key stakeholders are involved through interviews with the factory or production site management, loom owners, workers, family members and/or other community members as needed and appropriate to the situation. In the case of subcontracting and home-based production in particular, information is gathered from the weavers and others in the community in order to cross-check records provided by contractors to identify whether there could be any undisclosed subcontracting as well as to identify indicators of possible non-compliances, particularly child labour, forced and bonded labour.

There is a complaints procedure in place as well as GWI-CD Code of Ethics, available online for all stakeholders to share feedback, dissatisfaction or to report any instances of potential fraud or professional misconduct at www.goodweave.org/about/certification-division.

¹ See Appendix for an explanation of the Certification Committee, Oversight Committee, Executive Leadership Team, Board and their respective roles and responsibilities.

2. Personnel Competence

GoodWeave sets minimum qualification and competency requirements for inspectors/auditors in consultation with the GoodWeave Director and local field teams. It also determines the key qualification requirements for the CC/OC members and the GoodWeave Director. Inspection/audit personnel are evaluated through annual performance reviews, as well as through periodic shadow audits in conjunction with internal audits of GoodWeave's offices in producer countries to identify strengths and areas for improvement.

Inspector/auditor team training

Once taken on as a trainee, inspectors undergo an in-house training program covering inspector responsibilities, content of the GoodWeave standard, policies and procedures, etc. This is followed by field training under the supervision of a senior inspector, which includes:

- Shadow a senior inspector audit;
- Conduct audits along with a senior inspector;
- Senior inspectors evaluate the performance and conduct of the trainee;
- Once the training has been satisfactorily completed, the GoodWeave Director approves new trainees to lead inspections.

GoodWeave also provides ongoing training to inspection teams on the basis of needs identified during internal audits, annual management reviews and personnel evaluations. GoodWeave also conducts all-country inspection team training programs periodically when needs arise, in order to calibrate and ensure consistency across the various country and regional inspection teams.

Managing Conflicts of Interest

Identifying and managing potential conflicts of interest is an important part of safeguarding impartiality. This is addressed in each of the Terms of Reference (TOR) for GoodWeave Director and the CC/OC. Certification Division personnel are required to complete the Declaration of Interests form.

The composition of the Certification Committee, which is responsible for making certification decisions, is designed to minimize potential conflict of interest by requiring a majority of independent experts to serve as voting members, and prohibiting involvement of industry members and inspection staff in the decision-making process.

3. Assessment

The GoodWeave Licensing and Certification Policy describes the requirements for a company to become licensed and for certification labels to be issued, as well as requirements related to compliance assessment, decision-making, handling non-compliances, appeals and complaints.

There are three types of assessments of producers for compliance with the GoodWeave Standard, which are referred to as inspections or audits:

- Initial inspections/audits
- Regular (unannounced) inspections
- Follow-up inspections/audits

Frequency and Intensity of Inspections/Audits

Initial inspections/audits must be completed prior to licensing. After this, regular (unannounced) inspections are carried out at a minimum every 6 months for all production units supplying to the exporter, including subcontractors and home looms. All units, irrespective of level, where child labour has been identified earlier, are inspected at a higher frequency, at least once a month during the 3 months following the date in which child labour was last identified at that unit. Higher inspection frequencies may be used in particular areas taking into account risk factors identified, such as areas known to have high incidence of child labour, bonded labour, trafficking or other issues. Follow-up inspections are carried out when child labour and other non-compliances are identified, in order to verify that remediation procedures have been completed. Exporters that are fully compliant receive a follow-up audit annually.

Two inspectors work as a team as standard practice. However, there could be regional or country specific reasons (security level, geographic spread, manpower availability) allowing either one inspector or a larger inspection team to be deployed.

GoodWeave inspectors and other personnel provide general information about the GoodWeave standard and inform employers and workers about child rights and labour rights. This information may be shared within or outside of the audit/inspection process.

Decision-Making on Non-Conformities and Sanctions

The Certification Committee makes decisions relating to licensing and certification on the basis of findings from the inspection/audits. In order to ensure a consistent decision-making process, the GWI-CD employs a certification methodology to determine levels of non-conformity with the standard. When non-compliances are found, there are two types of actions that follow:

- (1) In cases where child labour is discovered during an inspection, the role of the inspector is to raise an alert and the inspection process for purposes related to certification effectively stops at this point. Thereafter procedures for rescue and rehabilitation of child labour are followed; however, these fall outside the scope of the certification process.
- (2) In any case of child labour or other non-compliances, GoodWeave employs enforcement guidelines and a schedule of sanctions to direct the actions to be taken with respect to the producer if the non-compliance is not corrected as confirmed through a follow-up inspection.

NOTE: The remediation of child labour is undertaken by GoodWeave with the cooperation of the producer; the responsibility of the producer is to correct the non-compliance (non-employment of child labour, allowing access to facilities for unannounced inspections, etc.) as per the certification methodology. It is therefore important when using the term “remediation” to distinguish between the actions taken by GoodWeave in response to cases of child labour and the actions of the producer to comply with the standard.

4. Oversight

An oversight mechanism independent of the GWI Certification Division (GWI-CD) ensures that it complies with GoodWeave policies and with the requirements of ISO 17065, and that its competence and consistent performance is periodically reviewed. This mechanism consists of an assessment by an independent third party individual or organization, which may be an accreditation body member of ISEAL, using an ISO 17011 model and/or which has experience with other similar social or environmental certification systems. The procedures and timelines for oversight assessments are

developed by the GWI Secretariat, requiring at a minimum a full assessment of the GWI-CD management system, the inspection/auditing processes, and performance and competency of personnel to be conducted at field offices through document review and shadow (witness) audits, at least once every five years with virtual/desktop review to take place every two years. Any corrective actions necessary are identified in consultation between the Secretariat and GWI-CD and the results reported to the Oversight Committee, which determines whether the actions taken are sufficient. The oversight procedure as well as the parties involved (the independent assessment body and Oversight Committee) will be reviewed annually in order to ensure their continued suitability including independence and competence.

5. On-going Scrutiny

GoodWeave maintains a trademark policy, which controls the use of intellectual property, including the GoodWeave logo, certification labels and any claims or promotional use by members of the carpet industry. Compliance with the Trademark Policy (available online at www.goodweave.org/about/certification-division) is a requirement of the license agreements executed with carpet importers and exporters. In case any indication of possible fraud or misrepresentation is found, license agreements allow GoodWeave to audit and inspect the licensee's workplace, records and personnel. The license agreement and any right to use GoodWeave trademarks are terminated if any violations of the policy are found.

Each GoodWeave certification label is individually numbered and can be traced back to the licensee to which it was issued. Any use of the GoodWeave trademark other than for product certification with GoodWeave labels must conform with the Trademark Policy. In no case may a licensee or its subcontractors make misleading or false claims regarding the certification status of the products including any claims regarding certification status other than as evidenced by the application of certification labels on finished products per the Licensing and Certification Policy.

GoodWeave tracks label use patterns, as well as media and publicity (e.g. in advertising, retail showrooms, trade shows, etc.) used by producers, exporters, importers, and retailers in order to monitor for any possible fraud, in particular within the consumer-facing marketplace.

Referenced Documents

- GWI Licensing and Certification Policy
- GWI-CD Terms of Reference
- Certification Committee Terms of Reference
- Oversight Committee Terms of Reference
- Certification Methodology

Appendix: Organizational Structure of GoodWeave

GoodWeave International is a legal entity registered in the United States of America and operates as a network of organizations based in India, Nepal, Afghanistan, Germany, the UK and USA. The overarching structure of the organization is depicted below, consisting of a Board of Directors, Secretariat, Executive Leadership Team, several committees and the Certification Division. The latter is established as a distinct division of GWI with the responsibility of managing and implementing all operations relating to inspections, monitoring and certification, as well as licensing in producer countries.



- GWI is governed by the *Articles of Association*, which is the highest governing document and establishes the Board of Directors, as well as designated decision-making bodies including the GWI Standards Committee and GWI Certification Committee. Policies and procedures direct the daily operations of the organization.
- The GWI Board of Directors is the highest decision-making body on fundamental matters and determines GoodWeave’s strategic objectives. It is responsible for approving GWI policies and oversees the Secretariat and the Certification Division.
- The Executive Leadership Team (ELT) is responsible for the day to day operations of GoodWeave. The Standards Committee, which is responsible for developing and deciding on the content of GoodWeave Standards, reports to the ELT.
- The GWI Certification Division (GWI-CD) is the certification body for the GoodWeave system. It is separate from the standard-setting arm of GWI and consists of:
 - The Director and Senior Management of GWI-CD;

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- The Certification Committee, which is responsible for making certification decisions and providing guidance for the implementation of the inspection and monitoring programme;
 - National inspection units based in each producer country where GoodWeave operates the inspection and monitoring programme;
 - Contracted inspectors may be employed for specific purposes outside of the national inspection units if a need arises; and
 - An Appeals Committee may be formed on an as-needed basis
- The Oversight Committee is responsible for providing oversight and safeguarding impartiality.
 - The Child Protection Committee provides feedback and advice to the Secretariat on issues related to child protection.
 - GoodWeave Affiliates and Programs (also previously referred to as National Initiatives) carry out the day to day activities of the GoodWeave program in producer and consumer countries, including programs outside the scope of the certification system.