APSCA

ASSOCIATION OF PROFESSIONAL
SOCIAL COMPLIANCE AUDITORS

COMPETENCY
FRAMEWORK

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APSCA'S COMPETENCY FRAMEWORK

The Association of Professional *Social Compliance Auditors* (APSCA) aims to increase the value and effectiveness of independent *Social Compliance Audits* by enhancing the **professionalism, consistency and credibility** of individuals and organizations performing them.

Labor rights and workplace conditions are a central focus for many organizations, due to expanding global supply chains, public perceptions related to social responsibility, and legislation. Independent *social compliance services* are an important tool in advancing labor rights and workplace conditions for *workers* globally. APSCA aims to raise the value, quality and effectiveness of *social compliance services* and support *Member Auditors* and *Member Firms* who are performing them.

Social compliance auditing plays a vital role in initiatives to assess and improve labor rights in the workplace throughout global supply chains.

APSCA'S *Competency Framework* is to be read in conjunction with APSCA's Code and Standards of Professional Conduct ('Code') the Use of APSCA's Membership Number, Auditor Handbook and Glossary of Terms.

1. SOCIAL COMPLIANCE AUDITING AS A PROFESSION

Through APSCA's Certified *Social Compliance Auditor* (*CSCA*) program, the organization aims to elevate the role of the social compliance *Auditor*, and develop a workforce of committed, competent, experienced and ethical professionals. *Auditors* can help their *clients* make positive change to the lives of *workers* by identifying and understanding key labor rights issues. To help them succeed, *Auditors* should be provided with the working conditions and the ongoing support and development needed to maintain high quality standards.

APSCA believes *Member Auditors* deserve to be treated with respect in line with the UN Guiding Principles for Business and Human Rights. APSCA expects *Member Firms* to respect the human rights of its *Member Auditors* and avoid causing or contributing any adverse human rights impacts.

APSCA supports audit programs, initiatives, brands and retailers who utilize the skills of social compliance *Auditors* for them to have the necessary confidence in the level of *Auditor* competency.

Note: Throughout this document an APSCA *Associate Social Compliance Auditor* (*ASCA*) will be noted as *ASCA*, and an APSCA *Certified Social Compliance Auditor* (*CSCA*) will be noted as *CSCA*.

2. APPLICATION OF THE COMPETENCY FRAMEWORK

APSCA's *Competency Framework* for Social Compliance *Auditors* sets out the basic competency requirements for *Certified Social Compliance Auditors* (*CSCA*). Competency refers to the knowledge and skills drawn on in performing tasks necessary to operate in the role of a social compliance *Auditor* .

This framework specifies the competencies expected of *CSCA*. It is intended to be used by:

- *ASCA* to better understand the skills and knowledge required to gain and maintain *CSCA* status.
- *CSCA*s to validate their skills, abilities, and articulate the value of Certification.
- Clients and the public to understand the value of using a *CSCA*.
- APSCA *Member Firms* as guidance for the development of internal frameworks.
- *CSCA* and APSCA *Member Firms* for continuing professional development (CPD) requirements.
- APSCA to guide the *CSCA* certification process and monitor adherence to the APSCA *Code*.

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- Audit programs, initiatives, brands and/or retailers who utilize the skills of social compliance *Auditors*, to:
    - Have confidence in *Auditor* competency. Training and education program developers in the design and development of learning objectives and materials for course curricula and profession-specific programs.
    - Anyone who works or considers working as a social compliance *Auditor* to ensure they are informed regarding the competency requirements for *CSCA*.
- *ASCA* to apply efficiently the principles of objective auditing to gain and maintain*CSCA* status.

The intention of this document is to outline the competencies required by *CSCA*s, not to set audit standards or define audit methodology. The brand, initiative or collaborative program will be responsible for communicating and validating that their specific expectations are adhered to.

Members providing *social compliance services* must be independent and avoid conflicts of interest that, in fact or in appearance, may create an incentive to report anything other than the true and accurate facts gathered during a *social compliance service*.

Member Firms shall only deploy social compliance *Auditors* (whether direct employees or independent contractors) who demonstrate, at a minimum, the relevant knowledge, skills and attributes outlined in the APSCA *Competency Framework*, and agree to act in accordance with the *Code*.

3. APSCA QUALIFICATION LEVELS

There are two (2) levels for APSCA *Auditor* Membership; *ASCA* and *CSCA*. During the initial period, APSCA had a level called *Registered Level Auditor* (*RA*). This was an interim level which includes *Auditors* who have provided evidence of the experience required to be a *CSCA*, and are going through the *CSCA* examination process. *RA*s have the rights, responsibilities and obligations of a *CSCA*. The *RA* Level is being phased out May 2023. Any *RA* that remains as of 31 May 2023 will be moved to *ASCA* until they pass all 3 parts of the *CSCA* exam.

APSCA ASSOCIATE SOCIAL COMPLIANCE AUDITOR (ASCA)

Entry-level social compliance *Auditor*, who is enrolled with APSCA, gaining experience under the supervision/guidance of a *CSCA*.

Requirements

- Has completed classroom training with an APSCA *Member Firm* or an APSCA-approved organization and
- Shadowed a minimum of 3 *social compliance audits*
- Has been signed off by a *Member Firm* as competent in meeting *ASCA* Level competencies Receiving onsite/field training by an APSCA *Member Firm* or accredited training organization
- Holds a university-level degree
- Satisfactory results from pre-employment screening of new staff/*Auditors*, where allowed by law
- Has signed APSCA's *Code*

Responsibilities

- Participates in social audits as a team member Must be supervised by an *CSCA* during all audits
- Does not independently make decisions or call out findings or non-compliances
- Adhering to the principles within APSCA's *Code*

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APSCA CERTIFIED SOCIAL COMPLIANCE AUDITOR (CSCA)

Experienced *Social Compliance Auditor* who has completed the *CSCA* process.

Requirements

- Has obtained the level of *ASCA*
- Has passed all elements of the *CSCA* examination process

Responsibilities

- Conducts *social compliance audits* independently and/or as part of a team
- Organizes, directs and manages audit team members in preparation, during and after the audit.
- Supervises *ASCA*s
- Approving and signing off on the audit report
- Adhering to the principles within APSCA's *Code*

Note: APSCA may consider exceptions to the above requirements on an ad hoc basis.

4. USE OF APSCA MEMBER AUDITOR NUMBER

APSCA *Member Auditors* may only sign off on a *Social Compliance Audit* if they are a *CSCA*.

Please refer to the Use of APSCA Membership Number, Auditor Handbook and APSCA's Code and Standards of Professional Conduct.

5. COMPETENCY OVERVIEW

Note: The competencies noted on pages 6 - 14 are focused on the specific activity of executing a *Social Compliance Audit*.

FOUNDATION SKILLS	FUNCTIONAL KNOWLEDGE AREAS
- Strategic and Systems Thinking - Professional and Ethical Behavior - Observation and Investigation - Data Collection and Analysis - Problem Solving and Analytical Decision Making - Management Systems - Documentation Review - Interview Skills - Communication, Relationship Management and Conflict Resolution - Self-Management - Standards, Laws and Regulations	- Business Legitimacy and Integrity of Records - Underage Labor - Discrimination and Disciplinary Practices - Forced Labor - Working Hours and Overtime - Freedom of Association and Effective Recognition of the Right to Collective Bargaining - Harassment and Abuse Practices - Wages, Benefits and Terms of Employment Subcontracting - Occupational Health and Safety - Use of APSCA Member Number

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6. VALIDATION OF DEMONSTRATED COMPETENCIES

The *Competency Framework* outlines the expected level of competency for *ASCA*s and *CSCA*s:

- **Understanding**: *Auditor* has a basic knowledge and understanding of what is required in this area but is not yet proficient.

- **Proficiency**: *Auditor* has a sufficient degree of skill and/ or expertise in this area.

Refer to APSCA's <u>Auditor Handbook</u> for more information on the exam.

6.1 CSCA EXAM (PART I AND PART II)

The *CSCA* Exam serves as a benchmark for the assessment of proficiency in the areas of functional knowledge and foundational skills. The exam assesses an individual's understanding of basic facts, policies, practices, methods, international human rights treaties and labor standards, local legislation and other regulations relevant to their role. The exam includes multiple choice, short answer and case study questions.

6.2 CSCA INTERVIEW (PART III)

Candidates must demonstrate proficiency required of *CSCA*s. This step will take the form of a formal interview assessing the individual's ability to conduct effective audits.

6.3 MAINTAINING CSCA CERTIFICATION

Individuals that are *CSCA* level looking to maintain certification will need to meet ongoing requirements. This is demonstrated through compliance with the standards for Continuing Professional Development (CPD).

CPD involves undertaking development activities that support *CSCA*s in ensuring maintenance of their competencies as well as expanding their professional knowledge and practice. *Auditors* are required to complete a minimum of 48 hours of CPD per calendar year, including mandatory training as outlined by APSCA. CPD undertaken must be tracked by the *CSCA* and recorded into APSCA's data system.

Information to validate these records may be requested by APSCA at any time. CPD includes the following:

- 16 hours – field social compliance audit

- 16 hours – training (focused on gaps identified during examination)

- 16 hours – APSCA recognized training which may include, firm, brand, scheme training, participation in social compliance conference or other relevant events.

Reference: APSCA's <u>Resource Library</u> for APSCA's Continuous Professional Development (CPD) policy.

7. MISCONDUCT

Any APSCA *Member* who is aware of another APSCA Member or *audit firm personnel* who has committed a violation of APSCA's *Code*, must inform the *Member Firm* for which the audit was conducted or APSCA.

Others who are aware of an APSCA *Member* or *audit firm personnel* who is to have alleged to have committed a violation of APSCA's *Code*, are encouraged to inform the *Member Firm* for which the audit was conducted or APSCA.

When professional misconduct or an infringement of the *Code* come to the attention of APSCA, there is an obligation that an investigation will be undertaken. If the outcome of such an investigation confirms a *Member* was in breach of the *Code* it will lead to an APSCA disciplinary hearing which gives the *Member*(s) the right to defend their actions. A possible outcome of such a disciplinary hearing would be to suspend or revoke APSCA Membership, which APSCA reserves the right to make public.

There is a restriction **therefore on** *Member Firms* **from appointing an** *Auditor* **whose Membership and / or certification has been withdrawn by APSCA** as well as a restriction on the *Auditor* from presenting themselves as a *Member Auditor* of APSCA. A *Member Firm* who has taken disciplinary action against a *Member Auditor* who has committed a violation of the *Code* shall inform APSCA.

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8. FOUNDATIONAL

Note: All areas are to be read "as related to the work"   U: Understanding   P: Proficiency

8.1 STRATEGIC AND SYSTEMS THINKING	ASCA	CSCA
Is open-minded, reasonable, and willing to consider alternative ideas or points of view	P	P
Is persistent and focused in their approach	P	P
Can integrate ideas and solutions across all levels and functions in the organization	P	P
Operates effectively in an environment of change and uncertainty, maintaining flexibility	P	P
Is aware of issues and develops timely strategies to solve problems or seize opportunities	P	P

8.2 PROFESSIONAL AND ETHICAL BEHAVIOR	ASCA	CSCA
Is fair, truthful, unbiased, discreet, trustworthy and respectful	P	P
Makes ethical decisions even though these actions and decisions may result in disagreement, confrontation or appeal proceedings; reports to higher levels of management or others when appropriate	P	P
Maintains objectivity and impartiality	P	P
Maintains confidentiality and avoids conflicts of interest	P	P
Maintains and enhances the reputation of the Member Firm, CSCAs, ASCAs, APSCA and the initiatives they are auditing against	P	P
Upholds the law, professional standards and policies when exercising judgement, seeking out advice where needed and relying on their ethical principles to guide their behavior	P	P
Possesses honesty and integrity, particularly in relation to preventing or reporting bribery and corrupt practices	P	P
Is courteous, conscientious and business-like in their approach to auditing	P	P
Can raise uncomfortable issues and ask challenging questions in a polite manner. Enables constructive challenge at all levels in the organization	U	P
Delivers factual, clear, accurate, timely and accessible reporting	U	P

8.3 OBSERVATION AND INVESTIGATION	ASCA	CSCA
Applies audit principles, procedures and techniques	U	P
Thoroughly reviews and analyzes relevant documentation	U	P
Possesses a detailed knowledge of compliance issues commonly applied for social *compliance audit codes* or *standards*	U	P
Uses investigative skills / triangulates a range of information to determine the authenticity of information and to verify possible allegations made by other sources	U	P
Triangulates information from interviews, documentation review and observation to draw conclusions regarding activities at the *facility*	U	P
Selects and applies a range of appropriate operational and management tools and techniques	U	P

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U: Understanding   P: Proficiency

8.3 OBSERVATION AND INVESTIGATION (Continued)	ASCA	CSCA
Is observant of physical surroundings, people and activities throughout the entire audit process	P	P
Applies detection / triangulation skills, looking for methods of document manipulation, fraudulent actions and fraudulent practices	U	P

8.4 DATA COLLECTION AND ANALYSIS		
Selects and applies a range of appropriate analysis tools and techniques	U	P
Undertakes effective sampling where appropriate	U	P
Mitigates impact of factors that can affect the reliability of audit findings and conclusions	U	P
Can reach timely conclusions based on logical reasoning and analysis	U	P
Uses numeracy skills to understand and interpret relevant number systems	P	P

8.5 PROBLEM SOLVING AND ANALYTICAL DECISION MAKING	ASCA	CSCA
Shows logical judgement skills, making decisions based on objective and verifiable evidence	P	P
Uses an evidence-based approach to problem solving and decision making	P	P
When facing an issue during an audit, can provide solutions to solve the problem	U	P
Assesses situations and information to make informed decisions on objective and verifiable evidence	U	P

8.6 MANAGEMENT SYSTEMS	ASCA	CSCA
Demonstrates knowledge of management system frameworks, applicable procedures or other management systems documents	U	P
Able to apply management system principles to different organizations and to interact between components of the management system	U	P
Demonstrates knowledge of the use of information systems and technology to validate the authenticity of records through triangulation	U	P
Understands specific organizational functions including human resource management, payroll systems, environmental, trade union relationships, collective bargaining processes, applicable collective agreements, health and safety cooperation, other *worker* representation and *worker* grievance procedures	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Policies, implementation and verification	U	P
Auditees capabilities and root cause analysis	U	P
Training	U	P
Feedback and grievance mechanisms	U	P

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U: Understanding   P: Proficiency

8.7 DOCUMENTATION REVIEW	ASCA	CSCA
Demonstrates the ability to review documentation specific to each of the functional knowledge areas, including:		
Business ethics management program (review documents: anti-bribery and anti-corruption – contracts/ agreement with suppliers, third party providers, business ethics records)	U	P
Environmental permits	U	P
Legal compliance with inspections, audits, certifications, collective agreements	U	P

8.8 INTERVIEW SKILLS	ASCA	CSCA
Is experienced in a range of interviewing techniques and uses as appropriate	U	P
Creates an environment where the interviewee/s feel comfortable and at ease	P	P
Can select a sample and/or groups for interview as appropriate	P	P
Can ask effective follow-up questions to collect information	P	P
Possess appropriate investigative interviewing skill to raise probing questions to collect information on sensitive issues, triangulate information across interviews	U	P
Interviews appropriate personnel, including management, HR, security staff, *worker* representatives and *workers* across shifts to gather information on adherence to relevant laws and other regulations	U	P
Listens to the interviewee and adjusts questions and tone of voice appropriately. Reads verbal and non- verbal cues	P	P
Relays findings without compromising the source of information, and deals appropriately with personnel who may feel compromised or uncomfortable being interviewed	U	P

8.9 COMMUNICATION, RELATIONSHIP MANAGEMENT AND CONFLICT RESOLUTION	ASCA	CSCA
Is tactful and respectful in dealings with people, balances diplomacy and assertiveness	P	P
Puts people at ease and builds open, constructive relationships with workers, managers, peers and *clients*	P	P
Can communicate and work with many different stakeholders, at various levels of an organization	U	P
Displays effective influencing and negotiation skills	U	P
Demonstrates strong (oral and written) reporting skills	P	P
Listens, understands and empathizes with others, and is sensitive to people's needs	P	P
Displays effective communication skills, oral, written and non-verbal, for example, when conducting audit meetings, interviews etc.	P	P
Demonstrates cultural awareness and sensitivity, with an appreciation of the situation of vulnerable *workers*, such as migrant labor, young *workers*, homeworkers etc.	P	P
Is a fluent speaker and reader of the language(s) used in the organization being audited, or communicates effectively through an interpreter	P	P
Discusses audit findings with appropriate levels of the organization independently and with confidence, while maintaining confidentiality and protecting potentially vulnerable individuals from retaliation	U	P
Assumes a leadership role during possible conflict situations and is confident to manage and control discussions	U	P
Anticipates reactions and objections and plans how to overcome	U	P

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8.10 SELF-MANAGEMENT	ASCA	CSCA
Arrives on site in a timely manner, prepared for the work, including knowledge of the appropriate standard, understanding of both industry and *facility*-specific details, in possession of any reference materials and supplies required for the audit	P	P
Arrives on site dressed appropriately – e.g. flat, enclosed shoes, PPE if required	P	P
Functions effectively and independently during audits	U	P
Demonstrates strong time management skills, by planning, prioritizing and adjusting audit activities as required	U	P
Demonstrates good organizational and time-management skills, ensuring deadlines, actions and objectives are achieved even when faced with problems, challenges and pressure	P	P
Responds well to feedback and is committed to continually developing own skills	P	P
Acts as a role model, demonstrating high performance for teams and individuals	U	P
Takes personal accountability for results delivered in area of responsibility, strives for excellence and encourages others to do the same	P	P
Monitors and improves own performance	P	P
Engages in continuous professional development	P	P
Recognizes limits to own professional competence, seeking support from other professionals and experts as needed	P	P

8.11 STANDARDS, LAWS AND REGULATIONS	ASCA	CSCA
Understands relevant applicable laws, regulations and the role of collective agreements where they exist	U	P
Understands relevant International Standards and international authoritative documents under all functional knowledge areas. Examples are the Universal Declaration of Human Rights, the Fundamental and other relevant ILO International Labor Conventions, the UN Guiding Principles on Business and Human Rights, applicable parts of the OECD Guidelines for multinational enterprises"	U	U

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9. FUNCTIONAL KNOWLEDGE AREAS

Note: All areas are to be read "as related to the work"   U: Understanding   P: Proficiency

9.1 BUSINESS LEGITIMACY AND INTEGRITY OF RECORDS	ASCA	CSCA
Demonstrates a detailed knowledge of business integrity standards	U	P
Demonstrates ability to effectively collect data, analyze and draw conclusions in relation to:		
Business Ethics Management System	U	P

9.2 UNDERAGE LABOR	ASCA	CSCA
Identifies young appearing *workers*, triangulates information, reports on current and / or historic underage labor	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Age verification system and records	U	P
Young *workers* – training/apprentice student worker/internship programs	U	P
Young *workers* – working hour limits, hazardous roles, night work	U	P
Child labor remediation	U	P
Hazardous work for young *workers*	P	P

9.3 DISCRIMINATION AND DISCIPLINARY PRACTICES	ASCA	CSCA
Investigate whether *worker* demographics represent industry/sector/country. Identify signs of policy implementation (e.g. signs posted in languages of all *workers, workers* understand their rights and the policies relating to discrimination and disciplinary practices)	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:	U	P
Employment decisions and Employment Equality (based on ability)	U	P
Non-discrimination policy	U	P
Monetary fines and/or deductions used as a form of discipline	U	P
Grounds for termination	U	P
Fair employment practices	U	P
Labor contracts (in language understood by *worker*)	U	P
Vulnerable groups, such as women, ethnic minorities, LGBTIQ+ people and people with disabilities (including discrimination in recruiting, hiring, employment, promotion)	U	P

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U: Understanding   P: Proficiency

9.4 FORCED LABOR	ASCA	CSCA
Understand operational indicators of forced labor; how to effectively identify these indicators during the audit process and how to record these indicators on audit reports in a manner that leads to remediation.	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Freedom of movement – including third party *workers* e.g. agency, contracted, dispatch *workers*	U	P
Payment to obtain a job – including throughout the recruitment and labor supply chain	U	P
Indebted or coerced to work, including document retention and deposits	U	P
With appropriate processes to identify these practices in the different business models of forced labor, particularly:		
State induced and prison labor	U	P
Employer induced, including rogue and corrupt managers and supervisors	U	P
Third party intermediary e.g. labor providers and sub-agents	U	P
Identify proactive policy implementation to deter, detect and correctly deal with suspected and actual cases of forced labor	U	P

9.5 WORKING HOURS AND OVERTIME	ASCA	CSCA
Investigate signs of potential non-compliances, e.g. signs of unrecorded working hours, coaching notes, cages blocking time cards	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Recording of working hours. Compliance with local law and international standards.	U	P
Objective means to set and monitor working hours	U	P
Waivers	U	P
Rest days / breaks between shifts / total working hours	U	P
Working hour limits for hazardous jobs and categories of *workers*.	U	P
Transparency and accuracy of working hours records	U	P

9.6 FREEDOM OF ASSOCIATION AND EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING	ASCA	CSCA
Identifies signs of compliance, such as signage relating to trade union events, space for union meetings	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Freedom to join lawful trade union without interference	U	P
Grievance procedures/ *worker* feedback on employment practices	U	P
Non-discrimination and non-retaliation	U	P
Collective Bargaining Agreement adherence	U	P

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9.7 **HARASSMENT AND ABUSE PRACTICES**	ASCA	CSCA
Observes interactions between supervisors, management and *workers*	U	P
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Disciplinary procedures	U	P
Grievance mechanism	U	P
Role of security guards against abuse	U	P
Physical punishment or physical abuse	U	P
Verbal abuse, mental abuse, coercion or harassment	U	P
Application of disciplinary procedures to vulnerable groups	U	P

9.8 **WAGES, BENEFITS AND TERMS OF EMPLOYMENT**	ASCA	CSCA
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Responsible recruitment practices	U	P
Payroll procedures (including payslips, regular payment)	U	P
Wage calculations including piece rate	U	P
Deductions	U	P
Benefits	U	P
Seasonal/temp *workers*/migrant *workers*/labor providers	U	P
Equal remuneration	U	P
Terminations and severance	U	P
Transparency and accuracy of wages records	U	P

9.9 **SUBCONTRACTING**	ASCA	CSCA
Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to:		
Ability to identify missing processes / ability to identify reasonable capacity	U	P
Identification of signs of homeworking	U	P

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9.10 OCCUPATIONAL HEALTH AND SAFETY	ASCA	CSCA

Demonstrates ability to effectively investigate, collect data, analyze and draw conclusions in relation to *workers* awareness and presence of:

	ASCA	CSCA
Health and safety policies and management system	U	P
Health and safety training	U	P
Licenses and permits	U	P
Potable water (review documentation)	U	P
Accident reporting and follow up actions	U	P
Personal protective equipment (PPE)	U	P
Equipment/machine safety	U	P
Waste and chemical management program (review permits, licenses, MSDS training for *workers*)	U	U
Repetitive motion (review assessment reports, interview workers, observe use of PPE)	U	U
Emergency procedures, fire safety, exits, fire prevention, fire extinguishers	U	P
Air Quality Management Systems (identify system in place to manage air quality in the work environment)	U	U
First aid	U	P
Sanitation and hygiene	U	P
Dormitories	U	P
Canteen	U	P
Lighting	U	P
Noise (documentation review of medical records, interview *workers*/management, ensure noise monitoring has been completed)	U	U
Ventilation and temperature control (documentation review, interview management/ *workers*, medical records, evaluating what checks have been undertaken)	U	P
Risk mitigation/supplier assessment/root cause analysis	U	P
Occupancy Certificate	U	P
Hazardous material handling	U	P
Waste Management	U	U

9.11 USE OF APSCA MEMBER NUMBER	ASCA	CSCA
How to write Member Number	P	P
When to use APSCA Member Number	P	P

Reference: Use of APSCA's Membership Number and Glossary of Terms

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