

NON COMPLIANCE PROCESS AND SEDEX

This document gives details on the definitions of a non compliance, observations and good examples. It explains the purpose of the Corrective action plan document (CAPR) and the actions required of the supplier site to agree (or dispute) the non-compliances. Also included is the purpose of the 'root cause' discussion, and the need for the supplier to take ownership and completion of the corrective actions.

Some information is also given on uploading the audit details to Sedex and links to further supplier guidance on audit upload onto Sedex.

During a SMETA audit an auditor will monitor and record a site's policies and practices against the actual code (for SMETA the ETI code) and any applicable national or local legislation

As part of the monitoring process, auditors will:-

- Interview the relevant managers to check their understanding of the code and legal requirements.
- Check the relevant documents and practices to measure the site's performance
- Interview appropriate workers to monitor their perception of the actual practices.

Where a site's practices do not agree with a code or legal requirements the auditor will record non-compliance. This creates an opportunity for the site to suggest what actions are needed to correct that non-compliance.

These discussions will be agreed with the site management and then clearly recorded on the Corrective Action Plan Report (CAPR). A copy of this document will be left with the site on the date of the audit.

In addition the auditor will record any observations, which may be defined as system weaknesses, which, unless improved could result in a non-compliance at a future date. Again corrective actions may be agreed for these observations and recorded on the CAPR.

The auditor will also be collecting and recording good examples, where the auditor feels the site's performance is over and above the standards and applicable laws.

A copy of the completed CAPR will be left at the site on the day of the audit. The completed Audit Report and CAPR will then be supplied to the audit payee and the authorised other parties in an un-editable format.

The audit findings will be uploaded to the Sedex System either by the site or auditor (Sedex recommends the auditor is used for increased impartiality).

In order to upload an audit onto the Sedex system, the site must first register the audit in the system, and select or input their chosen auditor. This then generates an e mail to the auditor who will be able to access the system and upload the audit findings as well as the PDF of the report and CAP.

Access to this information remains under the control of the site, which can choose appropriate viewing according to their links to customers on the system.