



# **WRAP Facilities' Handbook**

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### How to Use the Facilities' Handbook

The purpose of this Handbook is to serve as a guideline for facilities seeking WRAP certification. It will describe how facilities obtain a WRAP certificate, starting with registration, to the audit(s), and then to certification. WRAP reserves the right to make any changes and will provide updates in a timely manner through various platforms, including the WRAP website and memos.

WRAP recommends new facilities read this Handbook in sequential order before registering with WRAP. Facilities that are already familiar with WRAP certification may not need to read the full Handbook. If there are specific topics about which the reader needs more information, the Contents (pages 2-4) of this Handbook function as links to each section.

This Handbook is a living document, to be updated and distributed to monitoring firms every six months at the beginning and midpoint of each year. All updated information in the newest version of the Handbook will be highlighted.

There are multiple appendices to this Handbook. They are referred to parenthetically throughout the document and are linked in the Contents.

Links taking the reader to a web address will be underlined and written in blue.

A Glossary of Terms is included in the Handbook before the appendices. All terms and acronyms in the Handbook that are *italicized* and underlined are linked to the top of the Glossary of Terms section, where the corresponding definition can be found. The first time a term appears on a new page, it will be linked. Subsequent appearances on the same page will not be linked.

Questions about the Handbook can be sent to the Compliance Administration Department (See **Appendix 1**).

### Introduction to WRAP

Worldwide Responsible Accredited Production (WRAP) is an international certification program dedicated to ensuring workers have safe, humane, lawful, and ethical working conditions. We promote transparent, sustainable and responsible manufacturing and sourcing practices through education and collaboration. WRAP is headquartered in Arlington, Virginia, USA, with branch offices in Hong Kong SAR and Bangladesh, and representatives in Europe, India, Southeast Asia (Indonesia, Thailand & Vietnam), and Latin America. WRAP certification is recognized by many well-known brands, retailers, and agents around the world.

WRAP's Certification Program seeks to independently monitor and certify compliance with the 12 WRAP Principles. The WRAP Principles (See [Appendix 2](#)) are based on generally accepted international workplace standards, local laws and workplace regulations, and include the spirit or language of relevant conventions of the International Labor Organization (ILO), the United Nations Guiding Principles on Business and Human Rights, and the Organization for Economic Cooperation and Development (OECD)'s Guidelines for Multinational Enterprises. The first nine Principles cover child labor and forced labor, health and safety, harassment and abuse, discrimination, hours of work, compensation and benefits, and freedom of association. A Principle on environment serves to demonstrate a facility's commitment to environmentally responsible business practices. The final two Principles, on customs compliance and security, ensure that goods being shipped comply with applicable customs laws and that no non-manifested cargo (drugs, bombs, etc.) is transported along with finished products. WRAP follows the United States Customs and Border Protection (CBP)'s *CTPAT (Customs Trade Partnership Against Terrorism)* Guidelines for Foreign Manufacturers Minimum Security Criteria (MSC) as minimum requirements and has adopted those guidelines under WRAP's Principle 12 Security. In addition to a social compliance certification, facilities that are certified by WRAP will also meet the criteria necessary for a supply chain security audit.

Facilities that demonstrate proper adoption, deployment and monitoring of all 12 Principles receive certification, typically for a one-year period, but it can range from six months to two years. A WRAP audit provides an on-the-ground perspective of a facility's operations to ensure that they are maintaining compliant practices; as such, the certificate only applies to an individual facility, not a parent company or brand. All certifications require periodic renewal, and all certified facilities are subject to unannounced *Post-Certification Assessments* during their certification periods.

Compliance with the Principles is checked via audits carried out by professional third-party monitoring firms that have been accredited by WRAP. The monitoring firms and individual auditors who conduct WRAP audits must meet rigorous accreditation requirements and **must be members of the *Association of Professional Social Compliance Auditors (APSCA)***. Auditors undergo a training course conducted by WRAP and attend refresher training courses once every two years.

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WRAP maintains high expectations of its staff, accredited monitoring firms, and facilities. All WRAP activities should be conducted with the highest degree of honesty, transparency, and commitment to WRAP values and Principles.

### Use of WRAP Logos



[The WRAP Logo](#) is a registered trademark or trademark of Worldwide Responsible Accredited Production in the United States and other countries. A WRAP certification represents assurance of socially responsible production.

The WRAP Logo, the WRAP Certified Facility Logo, and the Made in a WRAP Certified Facility Logo (collectively, the Logos) are the exclusive property of Worldwide Responsible Accredited Production (WRAP). WRAP certifies socially responsible factories in the global sewn products sectors. The Logos are available for use by parties who make, buy, or sell products made in a facility that is WRAP-certified at the gold or platinum level. The Logos are also available for use by Monitors and other WRAP partners to show their support and association with WRAP.

Where used, the Logos must be reproduced as shown above. Where possible, the trademark credit line should be cited as well. In all instances of use, care must be taken to ensure the significance of the Logo is put in its proper context; in particular, it should be clear that it is not being used to make a product quality claim (for instance, if the Logo is to be placed on a product, then the user should utilize the "Made in a WRAP Certified Facility" version of the Logo).

#### **Additional use conditions for some users include:**

##### **A. Production Facilities**

- a. A production facility may use the WRAP Certified Facility Logo so long as the facility holds a valid WRAP gold or platinum certification. The facility must maintain full compliance with WRAP's 12 Principles during its certification period. The facility or facility group is responsible for ensuring that the Logo's use is limited to the certification period. Facilities may use the Logo on websites, business cards, social media, and other related media.

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### B. Buyers (Brands and Retailers)

- a. Buyers may use the WRAP Logo on consumer goods, packaging, websites, social media, corporate social responsibility reports, and related materials if facilities producing such goods are WRAP-certified at the gold or platinum level and remain WRAP-certified as described above.

### C. Monitoring Firms

- a. Monitoring firms may use the WRAP Logo on their website, business cards, promotional materials, and social media provided the Monitor is WRAP accredited while the WRAP Logo is in use.

## Confidentiality of Audit Documents

WRAP strongly values the confidentiality and privacy of the facilities in the WRAP certification program. WRAP only shares audit documents with entities outside of the WRAP organization with permission from the facility.

Facilities must authorize buyer(s) to receive and view any audit document from the facility's records. Once the audit has been conducted, the audit report is the property of the entity who pays for the audit (which is almost always the facility itself). The owner has the right to share the audit report with any entity it chooses. WRAP can always disclose a facility's status with regards to whether it is certified or not. For facilities that have chosen to be visible on WRAP's website, that information can also be ascertained through that public portal. **It is the auditor's responsibility to share any audit documents requested by facility management.**



# REGISTRATION

**Facility  
Type**

**PASA**  
(Pre-Audit Self-  
Assessment)

**Payment**

**MF**  
(Monitoring Firm)  
**Selection**

# AUDITS

**Initial**

**Follow-Up**

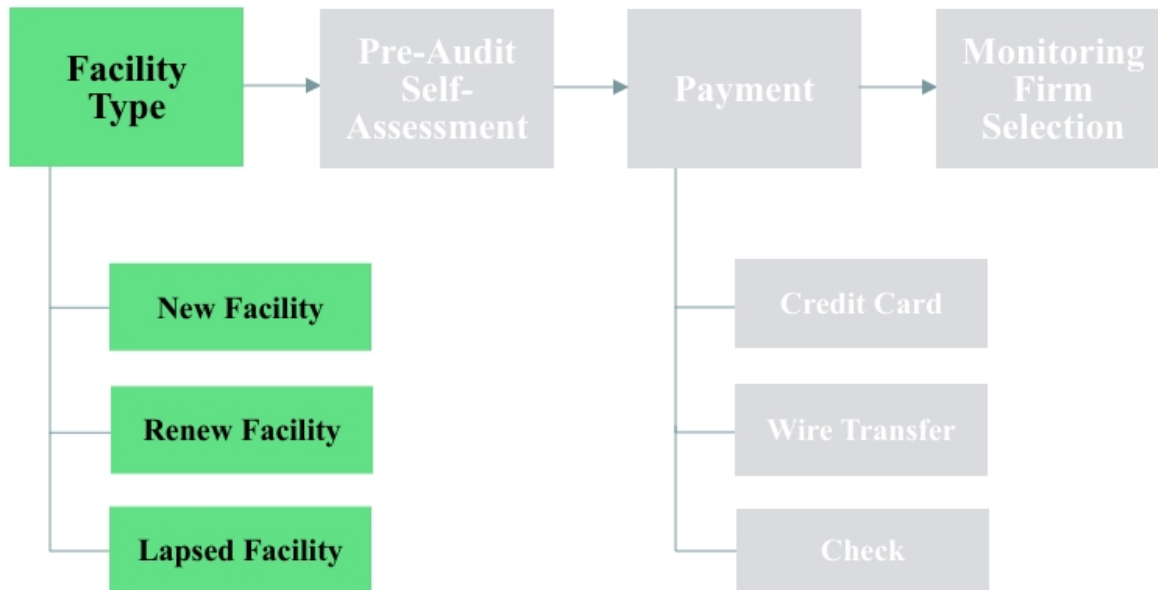
# CERTIFICATES

**Platinum**

**Gold**

**Silver**

### 1. Registration



#### 1.1 Facility Type

There are three types of facilities in the WRAP program: *New*, *Lapsed*, and *Renew*.

- New: Facilities either going through the certification process for the first time or have previously been certified by WRAP but have since moved to a new address/location
- Lapsed: Facilities that have been WRAP certified before but have not had any audit activities take place in 12 months after their last certificate expired
- Renew: Facilities that have previously been certified or audited in the last 12 months; their current certificates may still be valid while in the process of being audited

All facilities should follow the instructions given below. See **Appendix 3** for illustrative screenshots of the process.

- A. Once registered, log in at <https://my.wrapcompliance.org/pages/default.aspx>
  - a. First time users should follow the [New User Registration Link](#) to register to the platform
  - b. If the user forgot their password, click 'Forgot Password'
  - c. Enter the email address to receive the temporary password email message and then log in using the temporary password provided
  - d. Once logged in, the user will have the option to update their password from the 'My Profile' page
- B. After logging in, click on 'My Dashboard' to access any existing WRAP facilities or to register a new facility (all documents available to the facilities can also be accessed on this page in the left navigation as well as the user's profile, and order information)

<p>a. For <u>NEW</u> or <u>LAPSED</u> Facilities: To begin the registration process, click on 'Register New Facility'</p> <p>i. Fill out the detailed registration form</p>	<p>a. For <u>RENEW</u> Facilities: Click on the company name for the designated facility</p> <p>i. Click the link and complete the brief application; Click 'Submit'</p> <p>ii. The 'Apply for Certification' button should appear at the bottom of the screen if the facility's current certificate is expiring in 90 days or less</p> <p>iii. Facilities are encouraged to start the reapplication process 90 days prior to their current certification expiration to avoid any lapse between certification periods</p>
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- C. Once the form is complete, the user will be prompted to submit payment before choosing a monitoring firm
- D. Select 'Proceed to Checkout' from the 'My Cart' page
- Make sure the correct billing address is added at the top of the page
  - The user can select their payment method (check, wire transfer, or credit card)
  - Note if the user is paying via check or wire transfer, the **WRAP ID, Facility Name, and Invoice number** MUST be included on the payment

The six-month registration period will begin the day that WRAP applies the payment. The certification process is expected to be completed within the six-month registration period.

### 1.2 Don't see 'Apply for Certification'?

If 'Apply for Certification' is not visible, it could be due to the following reasons:

- The facility's current certificate is still valid for more than 90 days from the current date
- An application for certification has already been submitted
- The facility has been temporarily suspended from the WRAP program

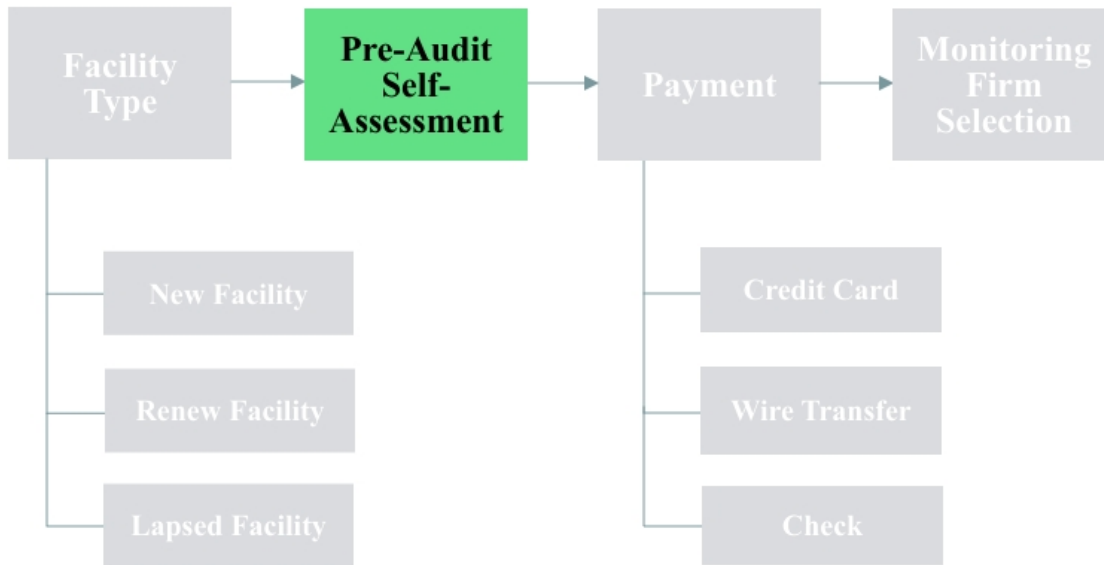
Contact the Compliance Administration Department (See [Appendix 1](#)) with questions.

### 1.3 CAPTCHA

Registration on WRAP's platform requires the use of CAPTCHA to verify the user is a human.

If you have trouble registering because your device does not allow the use of CAPTCHA, please contact the Compliance Administration Department (See [Appendix 1](#)).

### 2. Pre-Audit Self-Assessment (PASA)



The *Pre-Audit Self-Assessment (PASA)* can be downloaded from the [WRAP website](#). The PASA is available in four languages: Bengali, Chinese, English, and Spanish.

Before filling out the PASA, facilities must make sure they:

- A. Understand the Principles
  - a. Read the Worldwide Responsible Accredited Production Principles (See [Appendix 2](#)) and this Handbook
  - b. Email [info@wrapcompliance.org](mailto:info@wrapcompliance.org) if you have any questions regarding the 12 WRAP Principles
- B. Establish Responsibility
  - a. Identify the individual(s) responsible for completing the PASA, including both management and employees
    - i. Management should prepare required documents in advance and explain responsibilities and expectations of the WRAP Certification Program to the facility employees

#### 2.1 Uploading the Pre-Audit Self-Assessment

The facility must upload and submit the *PASA* prior to the initial audit. See [Appendix 4](#) for illustrative screenshots of the process.

- A. If the document was not uploaded during the initial application process, click on the company name from the 'My Dashboard' page
- B. Under the 'Applications' tab, there is a column labelled 'Self-Assmnt?'
- C. If the document was not successfully uploaded, the field will display a 'No'
- D. Click on 'No' and the upload screen will appear
- E. Once the file is selected, click 'Submit Document'
- F. PASA with insufficient information will not be accepted by the auditor(s), which could delay the audit

### 2.2 Internal Management System

WRAP promotes a management systems approach to achieve compliance with the 12 WRAP Principles. WRAP encourages the integration of the WRAP Principles into a facility's existing management systems. WRAP's approach requires top management at facilities to:

- A. Adopt the WRAP Principles in writing (See **Appendix 2**)
- B. Assign the necessary and competent staff to ensure the required practices are implemented throughout the facility
- C. Implement internal risk assessment systems to review the facility's processes over time
- D. Conduct an internal audit assessment at minimum once per year; health and safety can require more frequent checking depending on what is being examined (for example, fire extinguishers should be checked at least monthly, while aisles should be checked for blockages on an ongoing basis every day)
- E. Explain the WRAP Principles to employees as written in the facility policy manual highlighting how different parts of the facility's internal management system meet the WRAP Principles

The facility's internal management system should be designed to provide the following information for management review:

- A. Practices and evidence related to each WRAP Principle and each question on the PASA form
- B. Accurate written manuals, bulletins, and procedures relating to the labor practices, facility conditions, environmental, and customs compliance covered by the WRAP Principles
- C. The internal procedures for supervising the practices related to the WRAP Principles, including the results of internal monitoring and corrective action reports

To be compliant with the WRAP Principles, facilities must do the following three things:

- A. Adopt
- B. Deploy
- C. Monitor

Demonstrating that a facility has adopted, deployed, and monitored all relevant practices will require documentation and actions beyond responding "yes" in the PASA. The facility must provide objective evidence to show that all THREE – Adopt, Deploy, and Monitor – have been achieved in relation to the required practices related to the WRAP Principles. The facility must use the PASA as a tool to prepare themselves for the audit, and it includes questions where objective evidence will be necessary to prove a required practice is implemented.

Below are several examples of compliance, which are supplied for illustration only:

### 2.3 Adopt

1. Examples of Things to Consider:
  - a. Has the facility adopted practices that align with the WRAP Principles?
  - b. Have individuals at the facility been assigned responsibility for communicating the practices that align with the WRAP Principles?
2. Examples of Evidence:
  - a. Written policies and procedures, such as an operating policy manual
    - i. As an example, the facility management staff obtains proof of age documentation from all potential workers prior to hiring and critically examines the documentation for authenticity; this is evidenced by photocopies of the documents kept in personnel files
  - b. List the designated facility individuals who are responsible for communicating the practices that align with the WRAP Principles
    - i. As an example, a job responsibility chart showing the facility human resources manager with responsibility for listed activities such as affirming the workers' understanding of the facility's anti-discrimination policies and procedures
  - c. Program and materials to train relevant facility individuals on the practices related to the WRAP Principles, when appropriate
    - i. An example is documenting a training session for all facility individuals taking part in the hiring process to explain the facility's policy prohibiting involuntary or forced labor

### 2.4 Deploy

1. Examples of Things to Consider:
  - a. Are the practices relevant to the WRAP Principles being followed consistently?
  - b. Has enough time elapsed (typically 45 days minimum) since the adoption of the practices to show consistent use?
  - c. Is the practice communicated by the relevant individual and understood by the relevant facility workers?
2. Examples of Evidence:
  - a. Effective communication of the practice to workers
    - i. An example could include posters prominently displayed in the facility in the language the workers will understand
    - ii. Evidence of compliance could include documenting the minimum age requirements (WRAP Principle 3), minimum wage rates, benefits policies, and additional payment information (WRAP Principle 5)
    - iii. Relevant individuals understand the facility's anti-harassment and abuse policies through affirming statements by the facility management

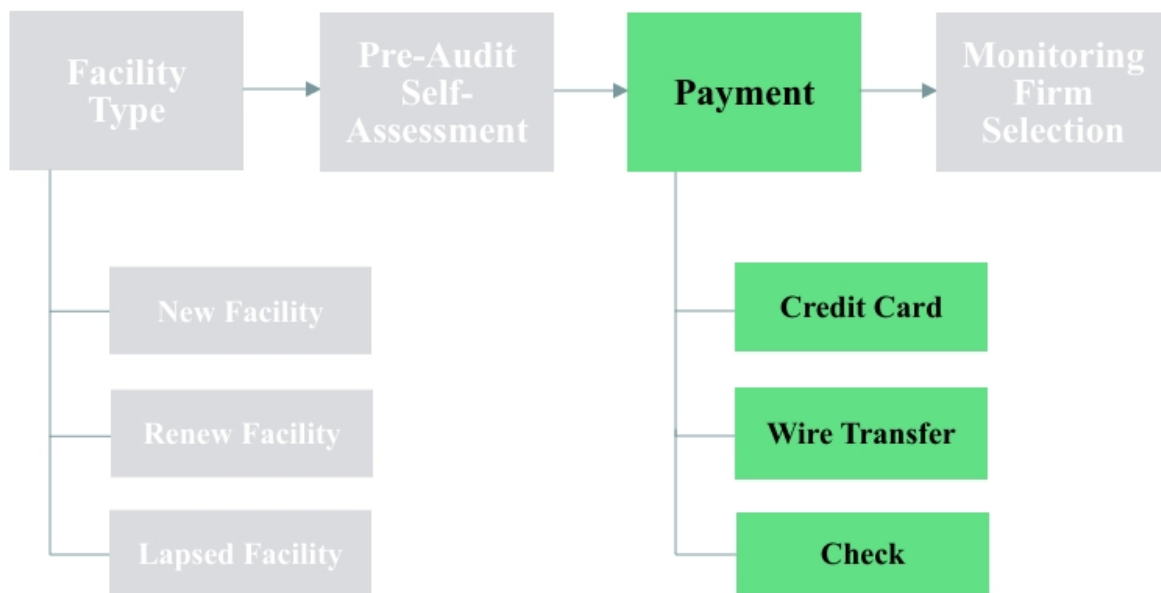
- b. The facility follows a practice consistently
  - i. As an example, the facility's health and safety records go back 90 days with entries at appropriate intervals

### 2.5 *Monitor*

1. Examples of Things to Consider:
  - a. Does your facility verify the effectiveness of the facility practices on an ongoing basis?
  - b. Are non-compliances identified, analyzed, and investigated?
  - c. Does the facility correct the non-compliances and document the correction on an ongoing basis?
2. Examples of Evidence:
  - a. The facility routinely reviews their practice related to the WRAP Principles
    - i. As an example, the facility periodically reviews age documentation records and hiring procedures to verify that age documentation is obtained from all potential workers and that all prospective employees are interviewed
  - b. Documentation is maintained by the facility management, when appropriate
    - i. As an example, the facility keeps comprehensive payroll records to support all employee compensation, including overtime calculations
  - c. The facility provides workers a confidential mechanism to communicate violations of practices to management (such as payroll discrepancies, mental or physical abuse, illegal transshipment activities); management investigates the violation, resolves the issue, and documents the resolution
    - i. As an example, the facility receives an anonymous phone call on the "worker complaint phone line" claiming that a production supervisor does not allow workers to talk to one another during breaks; evidence of monitoring includes management investigating the claim and documenting a meeting with the supervisor to explain the appropriate work practices that do not inhibit the workers' right to free association
  - d. The facility management corrects non-compliances and documents the corrections on an ongoing basis
    - i. As an example, the facility management discovers during a review of the payroll records that the local minimum wage increase was implemented at the facility two weeks after the change took effect under the local law; evidence of monitoring the practice includes correcting the worker wage calculations going forward and reimbursing workers the wage underpayment

- e. The facility management imposes disciplinary action on the management and workers responsible for violations of the practice, when appropriate
  - i. As an example, a production supervisor is found using corporal punishment (e.g., beating, hitting, slapping); evidence of monitoring the practice would include the facility management explaining why the behavior is wrong, taking any disciplinary action, and continuing to follow up to prevent the behavior

### 3. Payment



All facilities that are registering must complete a thorough application providing details regarding the facility information. Once the application is complete, a WRAP ID will be generated for *New* facilities. *Renew* and *Lapsed* facilities will continue to use their current WRAP ID. Please use this number in ALL correspondence with WRAP.

The registration fee is **US\$1195.00** for all facilities, except those re-applying prior to the expiration of a current 'Silver' level certificate, in which case the fee is **US\$895.00**. The registration fee shall be paid by the facility in full. The six-month registration period will begin once the payment is applied.



### 3.1 Invoicing

The system will generate an invoice for the registration fee which can be found in the user's cart. If any updates to the name or address need to be made, contact the Payment and Registration Department (See [Appendix 1](#)). If the facility did not receive a copy of the invoice, the Payment and Registration Department will email a copy upon request.

#### A. Wire Transfer

- a. Details to submit a wire transfer are available on the invoice
- b. If submitting payment via wire transfer, the facility must include the **WRAP ID, Facility Name, and Invoice number** on the payment

#### B. Check

- a. Checks are payable to Worldwide Responsible Accredited Production (WRAP) and should include the **WRAP ID, Facility Name, and Invoice number**
- b. Additional details can be found on the invoice

#### C. Credit Card

- a. WRAP accepts all major credit cards
- b. Payment can be made through the system during the checkout process

### 3.2 Payment Confirmation

- A. Upon payment of the registration fee, WRAP will issue a Payment Confirmation which the facility will have to show the monitoring firm before the audit window can be provided
- B. WRAP will upload the document under the Facility Dashboard so the facility can log in and access it from the 'Documents' tab
- C. Note that monitoring firms will not schedule an audit without payment confirmation from facilities
- D. WRAP could disregard the audit if it is conducted before payment has been made to WRAP

### 3.3 Applying Payment Internally

- A. If the facility is paying via check or wire transfer, the payment will take several days to reflect in the platform
- B. To ensure the payment is applied in a timely manner and to the correct facility, include the **WRAP ID, Facility Name, and Invoice number** on the payment
- C. If WRAP cannot identify the payment, it will not be applied, and the initial audit cannot take place

If the facility submitted payment and has not heard anything, email the Payment and Registration Department (See [Appendix 1](#)) to follow up with the payment status.

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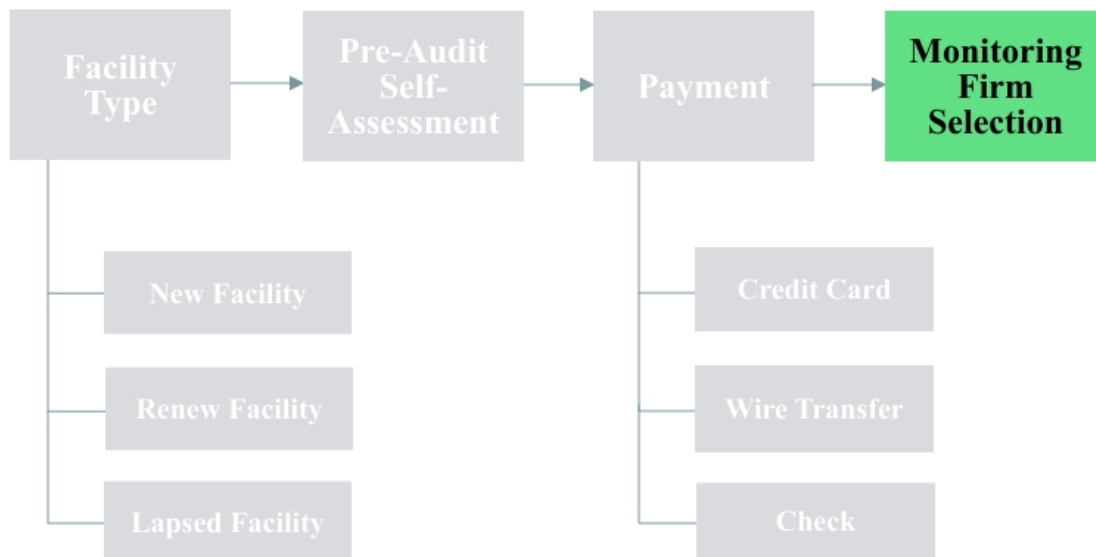
### 3.4 Fees are Non-Refundable

- A. If the facility is not certified within the six-month payment validation period, the facility will have to pay the fee again
- B. For special circumstances and requests, please contact the Compliance Administration Department (See [Appendix 1](#))

### 3.5 Registration Extensions

- A. If the facility does not pass the audit within six months from registration fee payment due to extenuating circumstances, the facility can request an extension
- B. Facilities must contact the Compliance Administration Department (See [Appendix 1](#)) if they need an extension
  - a. An extension request must be made prior to payment expiration
  - b. The facility must provide reasoning for the extension request
- C. Registration extensions are granted on a case-by-case basis, and only one extension is granted per certification cycle with WRAP's approval

## 4. Monitoring Firm Selection



- A. The list of monitoring firms can be viewed on WRAP's [website](#)
  - a. Please contact the Compliance Administration Department (See [Appendix 1](#)) if the facility cannot find a monitoring firm
- B. Monitoring firm fees are separate from the WRAP registration fee and specific to each firm
  - a. Please contact the monitoring firm separately for fees
- D. WRAP may request facilities to switch monitoring firms if need be
- E. Monitoring firms will not schedule an audit without payment confirmation

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- F. Facilities must provide monitoring firms with the *Pre-Audit Self-Assessment (PASA)* prior to the *initial audit*, and it must be uploaded no later than 15 days before the audit window
- G. Facilities cannot change their monitoring firm mid-certification cycle
  - a. Facilities that wish to change their selected monitoring firm must obtain WRAP's written approval in advance
  - b. An email should be sent to the Compliance Administration Department (See **Appendix 1**) for approval
  - c. WRAP will communicate with the existing monitoring firm to evaluate the situation

### 4.1 Audit Window

- A. After payment confirmation is received by the monitoring firm, an audit window of four weeks is issued by the monitoring firm
- B. Facilities must prepare for the audit before the window
- C. If the facility wishes to change the audit window, they must contact the Compliance Administration Department (See **Appendix 1**) and provide reasoning for their request
  - a. The facility should make sure the new audit window requested is within the payment expiration date
- D. Facilities must communicate with the monitoring firm if the facility will be closed due to holidays or rest days
- E. If there is political unrest or security concerns that could affect the safety of the auditor(s), an audit window can be changed
- F. If there is a delay caused by the monitoring firm for conducting an audit in a given window, the facility should contact the Compliance Administration Department (See **Appendix 1**) to correct the delay

## 5. For Facilities that Share a Location

If the facility shares a building with another business, they must provide the following information during the initial audit:

- A. The name of the business(es) that operate in each building
- B. Whether the facility and the other business(es) share workers, dormitories, and/or *business licenses*
- C. Facilities in Bangladesh must conduct joint fire drills and risk assessments with the other business(es)
- D. **Auditors must disclose a facility's relationship with its sister or group companies**

### 6. For Facilities with Multiple Plants

WRAP will make the decision regarding facilities with multiple plants on a case-by-case basis. The following elements will be factored into the decision:

- A. Business license(s)
  - a. Multiple plants with separate business licenses will require independent registrations
  - b. Facilities with multiple buildings functioning together as one manufacturing unit and have the same business license need a single registration for WRAP
    - i. Note that all the buildings will be included in the scope of the audit
- B. Separate payrolls
- C. Physical distance between buildings

A facility's WRAP certificate will include the exact physical address as stated on the business license, and will apply to only that facility, and not to any other facilities under the same ownership and/or in the same compound.

### 7. Name or Location Change

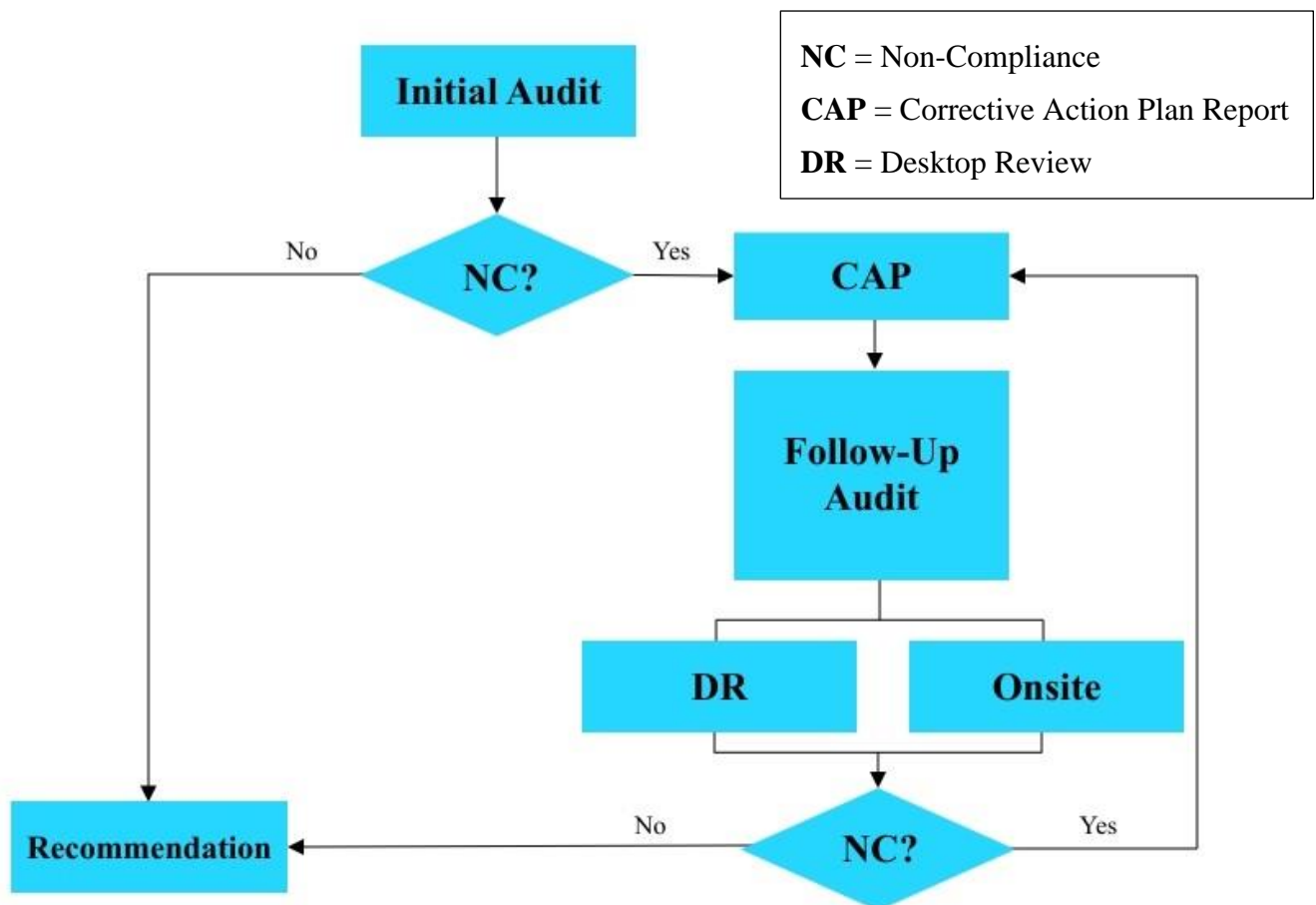
#### 7.1 Name Change

- A. It is the responsibility of the facility to notify the Compliance Administration Department (See **Appendix 1** for contact information) when the facility name changes or the facility relocates
  - a. The facility must submit the Name Change form to WRAP along with relevant legal verification.
  - b. There is no fee associated with a name change
- B. Auditors must inform the facility of the need to notify WRAP when they become aware of a facility name or location change
  - a. Auditors should also notify the WRAP Compliance Administration Department via email if upon performing an audit, they become aware of a facility name or address change.
- C. If the facility is currently certified and the name changes, the certificate will be updated to reflect the new name

## 7.2 Relocation

- A. If a facility relocates, they must notify the Compliance Administration Department (See **Appendix 1**)
- B. If the facility relocates and is currently certified, that certificate will be expired, and the facility will need to register as a *new facility* to get a new WRAP ID
- C. If the facility relocates and is NOT certified, they will need a new WRAP ID
- D. If the facility's address changes due to government re-zoning, facility can keep their WRAP ID and the Compliance Administration Department will update the address when notified by the facility

## 8. The Audit Process



### 8.1 Appealing Audit Results

If a facility does not agree with the audit results and wishes to appeal any non-compliance raised, the facility must contact the Compliance Administration Department (See **Appendix 1**). WRAP will review the request and provide feedback in a timely manner.

### 8.2 Scope of the Audit

- A. Facility Tour
  - a. Facility tours are used to verify company operations and inspect safety and welfare aspects against WRAP requirements
  - b. Auditor(s) will ask questions about how the facility operates and take photos of the premises
  - c. Facility management must allow the auditor(s) full access to the entire premises
- B. Worker Interviews
  - a. Auditor(s) will conduct private and group interviews with workers examining their awareness of relevant issues
  - b. Information given in interviews will be crosschecked with visual observations, management discussions, and document review
- C. Testing and Record Reviews
  - a. Facility management must produce all necessary records and documents to demonstrate compliance, including:
    - i. Wages and hours records
    - ii. Certificates and permits related to health and safety
    - iii. Insurance policies
    - iv. Government correspondence, if any
    - v. Management systems
    - vi. Any collective bargaining agreements, and/or any interaction between registered unions and management
    - vii. Records from grievance systems of complaints in the facility and the outcomes/resolutions
    - viii. Facility internal monitoring reports

### 8.3 Classification of Findings (Observations and Non-Compliances)

There are three ratings for findings raised during the audit. The ratings are determined by the auditor.

- A. Major
  - a. Systematic violations of local/national law and/or WRAP Principles, and/or any health and safety condition that might pose significant risk to workers' basic rights and/or safety
  - b. Failure of management systems, including excessive minor non-compliances that reveal an underlying dysfunction
    - i. If there are several minor non-compliances against the same Principle, it may warrant a major non-compliance on internal monitoring (i.e., Q1.3)
  - c. Non-transparency
  - d. Issues that require onsite verification, especially those that can only be fully validated with worker interviews and/or addressed through worker training
  - e. Failure of addressing, within the projected completion date, non-compliances raised during the *initial/follow-up audits* in this certification cycle

## Facilities' Handbook

- B. Minor
  - a. Occasional or isolated violations of local/national law and/or WRAP Principles that do not seriously compromise workers' basic rights and/or safety
  - b. Non-compliances that do not require onsite verification, worker interviews and/or worker training
  - c. Minor situations that do not affect a large number of workers
- C. Observation
  - a. Currently not a non-compliance but could potentially become one if timely actions are not taken (internal monitoring can help identify such issues); for example, certificates/permits that are valid during the audit but look set to expire in the near future with no indication that the facility has taken the steps necessary to ensure timely renewal
  - b. Can be raised under, but are not limited to, the following circumstances:
    - i. Excessive overtime hours under Principle 6
    - ii. Inward opening emergency doors found to be secured open during working hours but cannot be corrected to outward opening
    - iii. Rolling/sliding emergency doors found with a mechanism to keep them open during working hours
  - c. Observations must be listed in the CAP Pages, but should not be included in the Non-Compliance Table
  - d. Where an observation is raised, the applicable question in the audit report should be marked as if the facility is not in compliance

<p>c. Opening outwards?</p> <p><i>If inward opening/sliding/rolling emergency doors are found to be secured open during working hours, raise it as an observation in CAP.</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>It was noted that five evacuation doors in 1 block of 1-storey "U" style production building (around 5000 square meters) were rolling doors with fixed devices with around 170 employees working inside. The facility management representative claimed that they ensure evacuation doors to be opened during working time.</p>
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### 8.4 Audit Type/Audit Timeline

- A. Initial Audit
  - a. All facilities (regardless of type) will begin their certification cycle with an initial audit
    - i. If a facility shows full compliance when the initial audit is conducted, then a follow-up audit is not required, and the monitoring firm can proceed with recommendation for certification
    - ii. If a follow-up audit is required, it will either be an onsite follow-up audit or a desktop review

- B. Follow-Up Audit
  - a. Onsite Follow-Up Audit
    - i. If there are an excessive number of non-compliances raised during the initial audit, an onsite follow-up audit must be conducted
    - ii. Non-compliances raised under Principles 5, 6, and/or 8 will typically require an onsite follow-up audit
      - i. Facilities should expect a follow-up audit if a non-compliance is raised under CCTV requirements
    - iii. This cannot take place until 45 days after the facility's projected completion dates in the CAP Pages
  - b. Desktop Review
    - i. If the non-compliance is minor and does not require onsite verification, it can be closed by desktop review
    - ii. Facilities are required to send documents, pictures, or any other kind of record for review through email to the monitoring firm to close minor non-compliances
    - iii. This must take place within 30 days of the initial audit

### 8.5 Man-Days

- A. The minimum number of *man-days* needed is based on the number of workers at the facility
- B. It is the facility management's responsibility to accurately fill out the *Pre-Audit Self-Assessment (PASA)* and the application on the platform so the auditor can plan for the correct number of man-days
- C. The monitoring firm may charge the facility more fees if additional man-days are needed due to incorrect number of workers

### 8.6 Wages and Working Hours Records Review

- A. New/*lapsed* facilities must have at least the preceding three months of consecutive wages and working hours records for review
- B. Renew WRAP facilities must have three months (Current/Random/Peak, non-consecutive) of wages and working hours records for review from the past 12 months

### 8.7 Worker Interviews

Worker interviews are part of the audit process. Management must allow the auditor(s) to conduct group and individual interviews with the workers during the audit.

- A. Facility management interview will not be counted towards the total number of worker interviews included in the report
- B. Subcontracted workers (e.g., *canteen*, security guards) must be included during the interview process
- C. Management cannot interfere with interview process in any way and cannot choose who will take part in the interviews



- D. Interviews are to be conducted in a private area to foster confidentiality

### 8.8 Sample Size

- A. The sample size is determined by the number of workers listed in the PASA or on the day of the audit, whichever is greater, and is used for the interviews conducted by the auditor(s)
- B. Facilities must provide correct number of total workers to the auditor(s) prior to the audit
- C. If facilities are noted to have the incorrect number of workers during the audit, the auditor(s) may charge facility for additional man-days

### 8.9 WRAP Policy on Consultants

WRAP does not believe it is necessary to have consultants. However, a facility may hire consultants to help them achieve full compliance with the WRAP Principles. Consultants should not be present during WRAP audits. If consultants are used, WRAP highly recommends that facility staff work cooperatively and learn from consultants, resulting in long-term and sustainable facility improvements.

### 8.10 Monitoring Firm Review

The auditor(s) will clearly inform the facility representative of the audit results in the Closing Meeting with the facility management. Facilities should expect the monitoring firm to upload the report in WRAP's platform within 10 business days. A facility's corrective action plan **MUST** be submitted to the monitoring firm within three days of the initial audit to not delay report submission. Facilities should provide all other required evidence to the monitoring firm in a timely manner.

### 8.11 WRAP Review

- A. Once the monitoring firm submits the audit report to WRAP it will undergo internal review; whether non-compliances were raised during the audit will determine the type of report
- B. If non-compliances were raised, a Corrective Action Plan (CAP) report will be submitted by the monitoring firm and a follow-up audit (depending on the nature of the non-compliances, this could be either onsite or desktop review) must take place; once the auditor(s) determines the non-compliances are closed, the facility can be recommended for certification
- C. Once the Recommendation report is received by WRAP staff the following documents will be reviewed:
  - i. Working Hours Action Plan Report (WHAP)
    - 1. If an observation is raised under Principle 6, a WHAP report must be completed and approved by WRAP staff

- ii. Other additional country-specific or facility documents, such as Detailed Engineering Assessment (DEA) Reports
  1. Facilities located in Bangladesh must provide a DEA report from an accredited engineering firm to assess the structural integrity of the building(s)

### **8.12 Independent Review Board Evaluation**

- A. After WRAP's internal evaluation of the Recommendation Report, a final review is done by WRAP's independent review board prior to issuing the certification
- B. Based upon the recommendation of the independent review board, WRAP could approve, deny, or request more information on a report
- C. If denied or more information is requested, WRAP will follow up with the monitoring firm and facility management as needed

### 9. Working Hour Action Plan

WRAP has changed its certification criteria to allow factories that meet certain conditions to qualify for a standard, 1-year (Gold) certification, even if they are not yet in full compliance with limits on working hours set in local laws, if they submit a plan to reduce their working hours in the form of a Working Hour Action Plan (WHAP). Facilities are required to complete a WHAP and submit it to the monitoring firm who will submit them to WRAP. WHAPs will be included in a facility's audit file and they must demonstrate that adequate progress is being made toward the WHAP during each successive audit. WRAP will follow local laws on working hours. In countries that do not have a limit on overtime hours, a WHAP is not required. WRAP's approach to working hours does not allow the violation of other work hour-related laws providing statutory protections aimed at young workers, pregnant women, any other protected groups, or the general health and safety of all workers. A detailed set of guidelines to complete a WHAP can be found in Appendix 6.

Facilities must adhere to the following conditions when submitting a WHAP:

- A. Being fully transparent about their working hours
- B. Ensuring those hours are all being worked voluntarily, in conditions that protect worker safety and health
- C. Compensating all employees fully in accordance with WRAP's Principle on Compensation and Benefits
- D. Showing progress, from one audit to the next, toward meeting the working hour requirements in local law

Working hours will be evaluated during the initial audit and Post Certification Assessments (PCAs). If the facility's working hours are found to not be in compliance with local law, but the facility otherwise qualifies for a Gold certification, WRAP will engage with the facility to complete a WHAP that outlines a path to compliance.

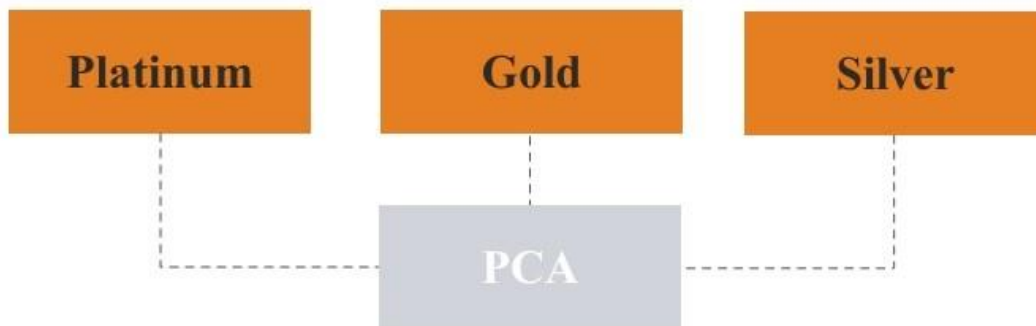
#### 9.1 Facilities Must

- A. Review guidelines shared by the monitoring firm and WRAP on how to fill out a WHAP report (also available under 'My Dashboard' on the platform)
- B. Check the WHAP is filled out completely before submission
- C. Submit a WHAP if overtime hours were noted during a PCA that were not found during the initial audit
- D. Ensure the WHAP is signed by a facility representative
- E. Provide new monitoring firm with prior WHAP and Interim WHAP (see below) if the facility was not audited by the same monitoring firm in the prior certification cycle
- F. Review whether the target stated in the prior WHAP report was met
- G. Be able to show monitoring and improvement actions, which are detailed and verifiable with a completion date if unable to meet their last year's target and reduce the number of overtime hours
  - a. For Example
    - i. Not acceptable: "Will try our best to reduce hours"
    - ii. Acceptable: "Will buy 20 new sewing machines within the next 3 months to improve efficiency"

### 9.2 Interim Working Hour Action Plan

- A. During the Opening Meeting, auditors will communicate that WRAP will contact facilities mid-certification cycle to check on the progress of reducing excessive overtime hours
- B. WRAP sends out WARNING EMAILS to the facilities who fail to achieve their target and do not implement improvement actions after two WHAPs

## 10. WRAP Certification



There are three levels of WRAP certification – Platinum, Gold, and Silver. The certificate issued to a facility is determined by WRAP and depends on the extent to which the audit indicates full compliance and management commitment to the WRAP Principles.

The issue date for all WRAP facilities will reflect the date a facility is approved for certification by WRAP staff. If your facility's current certificate is set to expire after the date of approval, WRAP will not push out the issue date to match the previous certification expiration date.

WRAP strongly encourages facilities to start the reapplication process 90 days prior to their current certification expiration. This will prevent any lapse between certification periods.

**WRAP reserves the right to expire or suspend a facility's certificate at any time if information is learned that the facility has not been maintaining WRAP's standards.**

# 11. Levels of Certification

## 11.1 Platinum Certificate

- A. Valid for two years
- B. Awarded to facilities that have demonstrated full compliance with WRAP's 12 Principles for 3 consecutive certification audits
- C. Facilities must successfully pass every audit with no corrective actions or observations and maintain continuous certification with no gaps between certification periods
- D. Facilities that have non-compliance(s) closed through *desktop review* are not eligible
- E. If a non-compliance is raised during the audit but is closed before the Closing Meeting, the facility will still be eligible for Platinum certification

## 11.2 Gold Certificate

- A. Valid for one year
- B. Awarded to facilities that demonstrate full compliance with WRAP's 12 Principles

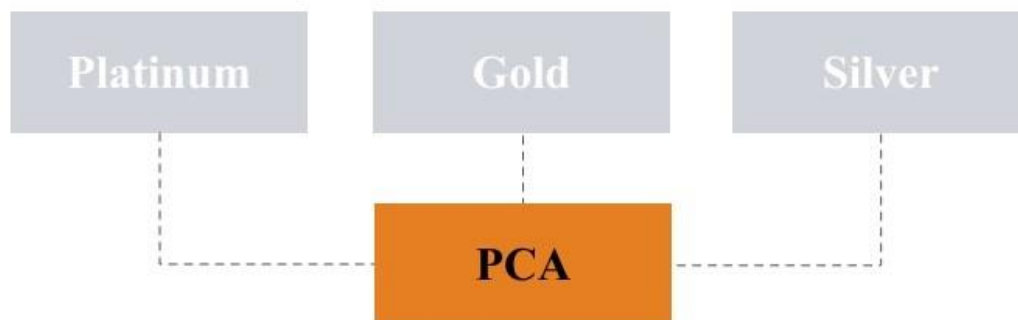
## 11.3 Silver Certificate

- A. Valid for six months
- B. WRAP may issue or a facility may request a Silver certificate if an audit finds it to be in substantial compliance with WRAP's 12 Principles, but identifies minor non-compliances in policies, procedures, or training that must be addressed
- C. Facilities seeking Silver certificates must request them in writing from WRAP's Compliance Administration Department (see [Appendix 1](#)), submitting a corrective action plan that includes any evidence of remediation along with the request
  - a. The WRAP review board may also recommend a Silver certificate if a facility has demonstrated difficulty in achieving full compliance or has other risk factors that may prevent it from sustaining compliance for the full duration of a Gold certificate
- D. Facilities may not have any Zero Tolerance issues or major non-compliances (including child labor; serious health, safety, or environmental issues; prison, forced, or involuntary labor; or harassment or abuse of workers) and must demonstrate that workers are paid at least the legal minimum wage and any required overtime compensation (i.e., no transparency concern)
- E. All Silver-certified facilities are eligible to renew their WRAP registration at a reduced fee of US\$895, provided they reapply prior to the expiration of their certificate
- F. A facility may be awarded no more than three consecutive Silver certificates

### 12. Certified Facilities Map

- A. Management can search their certified facility on the [world map on WRAP's website](#) if management checked 'to be listed upon certification' during the application process
- B. Facilities can expect to be listed on the map no later than 48 hours after they are certified
- C. Facilities can be searched by their WRAP ID or facility name
- D. When a certificate expires, a facility is no longer visible on the world map on WRAP's website
- E. If management cannot find their certified facility, contact the Compliance Administration Department (see [Appendix 1](#))

### 13. Post Certification Assessment (PCA)



A facility may at any time be subject to a free unannounced *Post Certification Assessment (PCA)* by a monitoring firm or WRAP staff during the certification period.

- A. Selection of the monitoring firm and date of the PCA is exclusively authorized by WRAP
- B. If your facility is selected for a PCA, WRAP or the auditor(s) will present an authorization letter upon arrival; management must fully cooperate with the auditor(s), grant full access to the facility, and demonstrate full compliance with WRAP Principles
  - a. If major non-compliances are noted, the Compliance Administration Department may:
    - i. Issue an *Alternative to Decertification (ATD) letter* to the facility requiring a facility-paid follow-up audit
    - ii. Expire a facility's certificate and request the facility apply to renew registration with WRAP
    - iii. In extreme cases, take steps to decertify a facility
  - b. If access is denied (failure to allow full or partial access to any physical sections of the facility), the Compliance Administration Department will issue an ATD letter to the facility requiring a facility-paid *follow-up audit*, and the facility must sign a statement stating why access was denied

- C. If facility fails to sign an ATD letter within the allotted time, or does not pay for the follow-up audit, WRAP may decertify the facility
- D. If the facility still has outstanding non-compliances found during a PCA follow-up, WRAP may require facility management to attend a relevant WRAP training course or face decertification

### 14. WRAP's Zero Tolerance Policies

If at any time WRAP learns that any facility in the WRAP Program is actively participating in or associated with any of the below Zero Tolerance issues, **THE FACILITY WILL BE DECERTIFIED (IF APPLICABLE) AND PERMANENTLY BANNED** from the WRAP program in all capacities without the option to return or be certified in the future.

- A. Deliberate and ongoing human rights violations
  - a. Child labor including the worst forms of child labor (slavery, forced labor, trafficking, serfdom, debt bondage, prostitution, pornography, work that involves children in illicit activity, or work that is likely to harm the child physically or morally)
  - b. Forced labor (bonded labor, not allowing workers to leave at their own will, forced to work overtime)
- B. Inhumane treatment (the use of threats of physical harm or extreme intimidation, corporal punishment, mental or physical coercion)
- C. Threatening physical harm towards audit team
- D. Bribery (money or favor given or promised to influence the judgment or conduct of a person)
- E. False representations to WRAP (hiding full/partial production floors and/or processes from auditor(s), submitting fake documents during an audit, etc.)
- F. False representation of WRAP Certificate or Audit Report (falsely holding out a facility as being WRAP-certified, submitting altered or fake documents to buyers, etc.)

#### 14.1 What if the facility is found to have child labor?

As indicated above, deliberate use of child labor is grounds for decertification. If it turns out the facility, despite its best efforts, has mistakenly employed someone they believed was of working age but turned out to be a child, WRAP requires the facility to address the issue immediately by completing the following steps:

- A. The child must stop working in the facility

- B. If the child stays in the facility dormitory, the facility must allow the child to stay until the child's legal guardian can take the child
  - a. If the child is not staying in the facility's dormitory, the facility must ensure the child does not go to work at another facility until his/her legal guardian takes the child
- C. The facility must contact the child's legal guardian to arrange sending the child back home
- D. If the legal guardian is not able to accompany the child back home, the facility must send staff to accompany the child back home
- E. The facility must pay the child all wages to which they are entitled
- F. The facility must pay all expenses incurred in sending the child home
  - a. The facility must maintain all relevant evidence (payroll, attendance, train ticket, legal guardian signature of receiving the child, etc.) for WRAP to verify
- G. The facility must review their hiring process and train their responsible person(s) so children are not hired in the future
  - a. An unannounced audit will be conducted to verify if child labor has been properly handled

### 15. Consecutive Working Days

- A. After six days of work, facilities must provide a rest day to workers
- B. Workers cannot work more than six consecutive days; consecutive working days of more than six must be raised as a non-compliance except for *Urgent Business Needs* (see below)
- C. In instances of Urgent Business Needs, facility must provide, at a minimum, one day off after 13 consecutive working days
- D. Facilities should expect a *follow-up audit* if a non-compliance is raised under consecutive working days
- E. Auditors must note in the audit report when there is a work schedule rearrangement that results in more than six consecutive working days to allow an extra rest day for a holiday

### 16. Urgent Business Needs

- A. Facility can ask their workers to work up to 13 consecutive working days but only under Urgent Business Needs
- B. Back-to-back urgent business needs must be raised as a non-compliance
- C. WRAP allows facilities to work up to 13 consecutive working days only under urgent business needs
  - a. The 14th day must be a day off
  - b. If local law for the number of consecutive days allowed is stricter, then local law controls; otherwise, WRAP guidelines must be followed



- D. WHAP report is not required if workers did not exceed legally allowed hours while working consecutively for 13 days
  - a. If legally allowed overtime hours are exceeded, the facility must complete and submit a WHAP report

## 17. Facility-Provided Housing

### 17.1 Management and Workers

- A. Facility-provided housing includes, but is not limited to, dormitories or apartments
- B. If dormitories or apartments are provided to workers and/or management, they become part of the audit scope
- C. If dormitories are outside the facility premises but workers are referred by management, then they are part of the audit scope
- D. If dormitories for management are outside the facility premises, then they are NOT part of the audit scope
- E. Rest areas for workers (security guards or management) should be covered during the audit but should not be marked as dormitory

## 18. CCTV Records

WRAP recognizes the United States Customs and Border Protection (CBP)'s CTPAT (Customs Trade Partnership Against Terrorism) Guidelines for Foreign Manufacturers Minimum Security Criteria (MSC) as minimum requirements and has adopted those guidelines under WRAP's Principle 12 Security.

Collection of CCTV records is part of CTPAT's requirements. If CBP changes their requirements for CCTV records, WRAP will update this Handbook accordingly.

The following are WRAP's CCTV requirements:

- A. CCTV located at the following sensitive areas:
  - a. **Mode of Transportation** Entrance/Exits
  - b. Packing areas
  - c. Cargo handling and storage areas
  - d. Yard and storage areas for containers, trucks, and trailers
- B. WRAP does not have a requirement for the number of cameras facility must install to fully collect CCTV records of the sensitive areas
- C. At least 30 consecutive days of CCTV records must be available for review
- D. 24/7; all production and non-production hours, nights, weekends, and holidays

- E. Non-compliances raised for insufficient CCTV records must be closed via onsite follow-up audit
  - a. In special circumstances, WRAP may allow the non-compliance to be closed through desktop review. Approval to conduct the desktop review must be requested from the Compliance Administration Department in advance (See **Appendix 1** for contact information)

If facilities do not export internationally, then CCTV is not required, and the facility must provide evidence to the auditor(s) of how the sensitive areas are secured. Facilities should expect a *follow-up audit* if a non-compliance is raised under CCTV requirements.

WRAP advises its auditors to review the following documents provided by CBP:

- A. [CTPAT Minimum Security Criteria—Foreign Manufacturers](#)
- B. [CTPAT's Five Step Risk Assessment](#)

## 19. Grievance Mechanisms

- A. Facilities must demonstrate an established grievance system such as a worker's committee or a union; only having a suggestion box is not acceptable
- B. Proper policies, procedures, and person(s) responsible should be in place to address employee grievances
- C. During the audit, the auditor(s) will document in the audit report the person responsible for addressing worker grievances and how the complaints are resolved, as applicable
- D. A representative from the grievance committee can also be part of other committees in the facility like health and safety committee, but the existence of a health and safety or other committee cannot, by itself, replace a formal grievance mechanism

## 20. Emergency Exit Doors

- A. Inward opening emergency doors are a major non-compliance except if:
  - a. Inward opening emergency doors are verified to be secured open during working hours
  - b. Inward opening emergency doors are CORRECTED to outward opening during the audit; will be raised as a non-compliance but marked as closed onsite
    - i. If inward opening emergency doors are found to be secured open during the audit, but cannot be corrected to outward opening doors, it will be raised as an observation in the audit report
- B. Rolling/Sliding Emergency Doors
  - a. Facility must have a mechanism to keep these doors secured open during working hours and it will be raised as an observation in the audit report
- C. Doors that are not Emergency Exits do not have to be outward opening

### 21. Fire Drill

- A. Facilities must conduct fire drills every six months, or more frequently if local law requires it, and have a planned date for the next fire drill. A non-compliance will be raised if fire drills are not conducted a minimum of once every six months (with a one-month grace period)
  - a. For example, if a fire drill was conducted on February 15, 2018, the next fire drill **MUST** be on or before August 15, 2018
  - b. A grace period of one month is allowed so the facility would have up to September 15, 2018 to conduct the fire drill
- B. Facilities must note the last two fire drills conducted in the facility and the planned date(s) for the next drill
  - a. Facilities must provide documentation of latest fire drill date(s) for each *follow-up audit* that takes place, including *desktop reviews*
  - a. Facilities must keep proper documentation including pictures with date and time stamp for each fire drill conducted
- C. WRAP recognizes that the time taken to fully evacuate workers to meeting points outside the facility will vary depending on the size of the workforce and the premise but suggests that the evacuation time for a typical facility should not be longer than 4 minutes; if facility fails to achieve the 4-minute evacuation time, auditor(s) must note it in the report and provide the facility's explanation

#### 21.1 Drill Dates and Times

All facilities must show proof of the last two and one planned fire drill dates in their facility. For every past fire drill, facilities must record and provide for the auditor the time it took for all personnel to evacuate and photo evidence that the drill took place. All photos must have a date and time stamp. These requirements differ between *new* and *renew* facilities and must be met to be certified.

- A. New
  - a. *New facilities* to WRAP that have been operating for less than 12 months are required to show proof of at least one past fire drill and two planned fire drills; photos and the recorded time it took for all personnel to evacuate are required evidence to prove the first fire drill took place
  - b. New facilities to WRAP that have been operating for more than 12 months are required to show proof of the last two fire drill dates and one planned fire drill date
- B. Renew
  - a. *Renew facilities* are required to show proof of the last two fire drill dates and one planned fire drill date; photos and the recorded time it took for all personnel to evacuate are required evidence to prove the last two fire drills took place

### 21.2 Facilities Sharing a Building

WRAP recommends that facilities sharing a building with other operations should conduct joint emergency evacuations.

## 23. Licenses/Permits

All licenses must be current. Facilities should regularly check the validity of their licenses and renew when necessary. If a required license is expired, it will be raised as a non-compliance during the audit if the facility has not started the renewal process before the audit takes place. New facilities will not be certified without valid licenses.

Facilities are required to have the following types of licenses, in addition to those required by law:

- A. *Business licenses*
- B. Building Safety-related licenses
- C. Health and Safety-related licenses
- D. Canteen Health licenses (2 varieties)
  - a. License for food preparation
  - b. Health license for workers

## 24. Canteen

All facilities with an operating *canteen* must have the necessary licenses as required by law. Facilities that provide canteen services for employees should follow these guidelines at a minimum:

- A. Canteen must be open during production hours, or as required by local law
- B. Display canteen rate list in a public area
- C. Conduct a health check-up for workers involved in preparation and distribution of food
- D. Monitor pest control issues and maintain a cleaning schedule of store and eating area
- E. Connect wastewater to ETP (Effluent Treatment Plant) for effective recycling and reuse of water
- F. Maintain adequate health and safety arrangements

### 25. Environmental Best Practices

WRAP requires facilities to comply with relevant environmental regulations and standards and encourages facilities to apply environmentally conscious practices to their operations. WRAP specifically mandates that facilities ensure proper waste management and that the environmental impact of their waste is monitored regularly. Other examples of environmentally conscious practices a facility could apply are identify environmental performance indicators in terms of natural resources (like reduction in consumption of power and water) and quantifying a reduction in pollution levels and making an effort to reduce them.

### 26. Health and Safety (H&S) Risk Assessment

A risk assessment is a systematic and comprehensive overview of occupational health hazards and hazardous environments encountered in the industry. It is a methodical tool to ensure a safe and healthy working environment at the facility. WRAP requires all facilities to conduct and document health and safety (H&S) risk assessments for all areas of their facility, with the intention of eliminating or greatly reducing the risk of harm or loss of life in your facility.

See **Appendix 7** for the Risk Assessment template and download the [Risk Management Guide](#) to from the WRAP website. The following is a summary of the five steps covered in the Risk Management Guide when performing a risk assessment:

1. Identification of the processes and their activities
2. Identification of hazards and their risks
3. Identification of severity of the harm caused by a hazard
4. Determining risk rating and necessary controls to mitigate the hazard
5. Periodic review of the risk assessment

Please see the Risk Management Guide for more details on performing a H&S risk assessment.

### 27. Country-Specific Issues

#### 27.1 Bangladesh

- A. Structural Integrity:
  - a. Must be able to verify whether the facility is approved as a residential, commercial, or industrial building
  - b. Detailed Engineering Assessment (DEA) report should be provided by an accredited engineering company approved by the Accord or Alliance, a legitimate engineering firm approved by government, or by Bangladesh University of Engineering and Technology (BUET)
  - c. Must be able to provide floor plans and licenses
  - d. Structural, Fire, and Electrical Safety Reports should be sent to WRAP for internal review
- B. Boilers:
  - a. Must be able to provide valid boilers' operator license
  - b. Boilers must be located on ground floor and separated from production/office space
  - c. If boilers are located on upper level/production floor facility must provide a corrective action plan to correct boilers' location
  - d. WRAP accepts mini boilers less than 22 liters on the production floor
- C. Security guards:
  - a. Subcontracted security guards will be noted as an observation in the audit report due to the industry-wide practice
  - b. Must provide security guards contracts for working hours, wages, and benefits
  - c. Facilities should take steps to convert subcontracted security guards to permanent workers
- D. Rooftops:
  - a. At least 25% of the rooftop must be vacant
  - b. Fully covered rooftop facilities will be marked as a non-compliance
- E. Canteen:
  - a. Must be open during production hours
  - b. Auditor(s) will note an observation if the canteen is not open during all production hours
- F. Cleaners and Loaders:
  - a. Temporary/subcontracted cleaners and loaders are permissible as long as the contracts are signed and regularly reviewed
  - b. Beginning January 1, 2020, auditors will raise observations for facilities who subcontract cleaners and loaders

### G. Basements:

- a. No production activities may occur in a basement
- b. Auditors will raise basement production activity as an observation starting January 1, 2020
- c. After a second certification cycle, basement production will be raised as a non-compliance

### H. Shared Building:

- a. Facilities that share a building with other business operations must conduct joint emergency evacuation drills

## 27.2 China

### A. Facilities must cover 100% of work-injury insurance

- a. Can be a combination of national insurance and commercial insurance

### B. When a facility elects to add or expand beyond the original construction without the permit to do so, it is treated as modifying the original structure, and a new fire safety completion certificate by the local authority is needed.

- a. If the construction acceptance certificate is not obtained, the facility should provide a third-party structural inspection report for the interlayer or new floor as a proof of the structural safety.
- b. Examples of these expansions include but are not limited to adding an interlayer or a new floor

## 27.3 Jordan

### A. Facilities must pay at least the same local minimum wages to foreign migrant workers

- a. These wages should be distributed fairly when compared to permanent Jordanian workers

## 27.4 Indonesia

### A. Facilities must convert eligible temporary workers to permanent status

### 28. Frequently Asked Questions

- How long does it take to get WRAP-certified?
  - It depends on the preparedness of the facility at the time of application. It can take as little as 6 weeks to get certified, but if the facility is unprepared it can take anywhere from 2-6 months, or in rare cases even longer, to correct all non-compliances.
- How much does it cost to get WRAP-certified?
  - WRAP charges a registration fee of US\$1195 for *new facilities* seeking certification as well as for Platinum and Gold-certified facilities seeking *renewals* (Silver-certified facilities seeking renewal are charged a reduced registration fee of US\$895 if they apply before their certificate expires). This fee does not include the price of the audit which is set by the individual monitoring firms and paid directly to them by the facility seeking certification. The fees charged by monitoring firms will depend on the size of the facility and its location. WRAP does not have a set pricing schedule for audits.
- Can I get a single WRAP certification for multiple facilities?
  - No. Each unit must undergo the process separately (See section on Facilities with Multiple Plants).
- How often are facilities audited?
  - There is no limit on how many times a facility can be audited, meaning that they can be inspected as many times as it takes for them to pass as long as they maintain a valid registration with WRAP. However, successive audits must generally be conducted at least 45 days apart. For certified facilities, the frequency of audits depends on the certification level. Silver facilities are inspected at least every 6 months, Gold facilities are inspected at least every year, and Platinum facilities are inspected at least once every two years. All certified facilities, regardless of certification level, are also subject to random, unannounced *Post-Certification Assessments (PCAs)* that can occur at any time and have no limit on how often they can be performed. PCAs are conducted at no cost to facilities, unless non-compliances that require a *follow-up audit* are found.
- Are WRAP audits announced to the facilities?
  - No. All audits are unannounced. Certification audits take place within a four-week window while *Post-Certification Assessments (PCAs)* are conducted at random and can occur at any time.



### 29. Glossary of Terms

- **Adopt:** To make complying with the WRAP Principles a facility policy.
- **Alternative to Decertification (ATD) Letter:** In an ATD letter, the facility agrees with outcome of the PCA audit and will pay for the monitoring firm/WRAP to conduct an on-site follow-up audit.
- **Business License:** A legal document from local government authorities that certifies a facility's permission to operate under their name and at their address.
- **Canteen:** A facility's canteen is where food is prepared and served. It must have relevant canteen licenses required by WRAP and by local law.
- **CAPTCHA:** Stands for Completely Automatic Public Turing Test to Tell Computers and Humans Apart. It is a program set in place to differentiate human from robot input, and it is used to ward off spam and automated data theft.
- **Corrective Action Plan (CAP) report:** An audit report submitted to WRAP by the auditor(s) if there were non-compliances found during the audit. A CAP report can be issued before a facility is certified or after a PCA.
- **CTPAT (Customs Trade Partnership Against Terrorism):** "A voluntary public-private sector partnership program which recognizes that CBP can provide the highest level of cargo security only through close cooperation with the principle stakeholders of the international supply chain such as importers, carriers, consolidators, licensed customs brokers, and manufacturers. The Security and Accountability for Every Port Act of 2006 provided a statutory framework for the CTPAT program and imposed strict program oversight requirements." [CTPAT: Customs Trade Partnership Against Terrorism | U.S. Customs and Border Protection \(cbp.gov\)](https://www.cbp.gov/ctpat)
- **Deploy:** To bring the WRAP Principles into effective action throughout the facility.
- **Desktop Review:** A follow-up to an initial audit in which the facility management can send the auditor(s) proof to close non-compliances without the auditor(s) revisiting the facility. This must take place within 30 days from the initial audit date.
- **Follow-Up Audit:** Any audit in the current certification cycle that is conducted after an initial audit in which non-compliances were found. Multiple follow-up audits can occur within the six-month period the facility is given before payment expires.
- **Initial Audit:** In any given certification cycle, the first audit conducted at a facility after they have applied.
- **Interim WHAP:** A follow-up conducted six months after the facility submitted a WHAP. WRAP contacts the facility to monitor their progress on reducing working hours according to the plan outlined in the WHAP.
- **Lapsed Facility:** Facilities that have been WRAP-certified before but have not had any audit activities take place in the 12 months after their last certificate expired.
- **Man-Days:** The number days the auditor(s) will be at the facility to complete the audit multiplied by the number of auditors conducting the audit.

- For example, if two auditors conduct an initial audit at your facility that lasts two days, the total number of man-days at the facility is 4.
- **Monitor:** To keep all required practices under periodic systematic review.
- **New Facility:** Facilities going through the certification process for the first time, or that have previously been certified by WRAP but have since moved to a new address/location.
- **Objective Evidence:** Proof a facility presents to a monitoring firm to close non-compliances and reasonably assure that the non-compliance will not be raised again. Can be submitted for desktop review as a photo with a date and time stamp or a document. Can be visually assessed by the auditor(s) during an onsite follow-up audit.
- **Onsite Follow-Up Audit:** A follow-up to an initial audit that requires the auditor(s) to revisit the facility to assess evidence to close the non-compliances raised in the facility's CAP report. It may not occur sooner than 45 days after the initial audit date.
- **Post Certification Assessment (PCA):** An unannounced audit that occurs after a facility is certified, led either by WRAP staff or the facility's auditor(s) during the certification cycle.
- **Pre-Audit Self-Assessment (PASA):** The Pre-Audit Self-Assessment is a document WRAP requires all facilities to complete before they choose a monitoring firm and their initial audit is conducted. It is used to show that facilities have been implementing socially compliant practices for a continuous period of time. New facilities are required to demonstrate at least three consecutive months. Renew facilities are expected to have been compliant throughout their preceding certification period.
- **Recommendation report:** An audit report submitted to WRAP by the auditor(s) if there were no non-compliances found during the audit. A recommendation report will be issued before a facility is certified.
- **Renew Facility:** Facilities that have previously been certified or audited in the last 12 months. Their current certificates may still be valid while in the process of being audited.
- **Urgent Business Needs:** A temporary situation the facility cannot control (e.g., strike, power outage, flood) that requires workers to work more than six consecutive days to meet production deadlines, not to exceed 13 consecutive days.
- **Working Hour Action Plan (WHAP):** A WHAP is a roadmap document that outlines an actionable, verifiable plan for a production facility to gradually come into compliance with their country's local working hour laws.
- **Young Worker:** A worker in a facility who is under the age of 18 and older than the legal youngest age for a worker or 14, depending on which age is higher.

**Appendix 1: WRAP Contact Information**

<b>WRAP Contact Information</b>	
<b>Payment and Registration</b>	
Dawn Williams	<a href="mailto:dwilliams@wrapcompliance.org">dwilliams@wrapcompliance.org</a>
Paulette Smith	<a href="mailto:psmith@wrapcompliance.org">psmith@wrapcompliance.org</a>
<b>Compliance Administration</b>	
Srishti Sharma	<a href="mailto:ssharma@wrapcompliance.org">ssharma@wrapcompliance.org</a>
Lauren Watrobsky	<a href="mailto:lwatrobsy@wrapcompliance.org">lwatrobsy@wrapcompliance.org</a>
<b>Marisol Nelson</b>	<a href="mailto:mnelson@wrapcompliance.org">mnelson@wrapcompliance.org</a>
<b>Compliance Assurance</b>	
Hong Mei	<a href="mailto:hmei@wrapcompliance.org">hmei@wrapcompliance.org</a>

For Country Specific contacts, please refer to <http://www.wrapcompliance.org/en/contact-wrap>.

### Appendix 2: WRAP's 12 Principles

*The WRAP Principles are based on generally accepted international workplace standards, local laws and workplace regulations, and include the spirit or language of relevant conventions of the International Labor Organization (ILO), the United Nations Guiding Principles on Business and Human Rights, and the Organization for Economic Cooperation and Development (OECD)'s Guidelines for Multinational Enterprises. The Principles encompass human resources management, health and safety, environmental practices, and legal compliance including import/export and customs compliance and security standards.*

*The Principles are meant to promote responsible business practices and sustainability in supply chain management, and contribute to the advancement of the United Nations Sustainable Development Goals (SDGs), in particular SDG 8 (Decent Work and Economic Growth) and SDG 12 (Responsible Consumption and Production).*

*The WRAP Certification Program's objective is to independently monitor and certify compliance with these standards, to ensure that sewn products are being produced under safe, lawful, humane and ethical conditions. Participating facilities voluntarily commit to ensuring that their manufacturing practices will meet these standards, and further commit to passing along, on their part, the expectation that their contractors and suppliers likewise comply with these standards.*

#### **1. Compliance with Laws and Workplace Regulations**

Facilities will comply with laws and regulations in all locations where they conduct business.

*All facilities will comply with the legal requirements and standards of their industry under the local and national laws of the jurisdictions in which the facilities are doing business, along with any applicable international laws. This will cover all labor and employment laws of those jurisdictions, as well as laws governing the conduct of business in general, including rules and standards of ethics dealing with corruption and transparency, and any relevant environmental laws.*

#### **2. Prohibition of Forced Labor**

Facilities will not use involuntary, forced or trafficked labor.

*Facilities will maintain employment strictly on a voluntary basis. Facilities will not use any forced, prison, indentured, bonded or trafficked labor. This will include ensuring that any workers they hire will be under labor contracts that fully comply with all relevant legal requirements and do not impose any form of coercion (including imposing substantial fines or loss of residency papers by workers leaving employment or restricting a worker's ability to voluntarily end his/her employment). In addition, workers should not be employed subject to any financial or collateral guarantee or debt security; any recruitment fees involved should be borne by facilities, not workers. Further, facilities will ensure that the workers' travel documents are not withheld, and that all written contracts are in a language understood by the workers.*

### **3. Prohibition of Child Labor**

Facilities will not hire any employee under the age of 15 (14 in less-developed countries) or under the minimum age established by law for employment, whichever is greater, or any employee whose employment would interfere with compulsory schooling.

*Facilities will ensure they do not engage in any form of child labor, including, but not limited to, the internationally recognized worst forms of child labor. Consistent with ILO Convention 138, facilities may not employ any person at an age younger than the law of the jurisdiction allows and in any case not below the age of 15 (14 in less-developed countries), even if permitted by local law. In addition, facilities will adhere to local legal requirements regarding mandatory schooling. Further, if, where permitted by local law, a facility employs young workers (defined as workers whose age is between the minimum age of employment and 18 years), the facility will also comply with any applicable legal restrictions on the nature and volume of work performed by such young workers, as well as any other requirements imposed by law, including limitations related to working hours and to ensuring that such young workers do not perform any hazardous work (e.g., chemical handling or operating heavy machinery).*

### **4. Prohibition of Harassment and Abuse**

Facilities will provide a work environment free of supervisory or co-worker harassment and abuse, and free of corporal punishment in any form.

*Facilities will ensure a workplace that is respectful of a worker's rights and dignity. This includes ensuring that no corporal punishment or physical coercion be used. Facilities will not engage in or tolerate – either at the workplace or in residential quarters provided by facilities or labor brokers acting on their behalf – any sexual harassment or abuse, indecent or threatening gestures, abusive tone or language or any other kind of undesired physical or verbal contact, such as bullying. In particular, facilities will ensure proper training at all levels - including management, supervisors and workers - to secure a workplace free of harassment and abuse.*

### **5. Compensation and Benefits**

Facilities will pay at least the minimum total compensation required by local law, including all mandated wages, allowances and benefits.

*Facilities will ensure proper compensation for their employees for all the work done, by providing in a timely manner all the wages and benefits that are in compliance with the local and national laws of the jurisdiction in which they are located. This will include any premiums for overtime work or work done during holidays, as well as any other allowances or benefits, including any mandatory social insurance, required by local law.*

### **6. Hours of Work**

Hours worked each day, and days worked each week and each month, should not exceed the limitations of the country's law. Facilities will provide at least one day off in every seven-day period, except as required to meet urgent business needs.

*Facilities are required by local law to adhere to any limits set on regular working hours as well as any limits set on overtime work. Long term participation in the WRAP Certification Program is contingent upon meeting the limitations set by local law. WRAP recognizes that this can be a particularly challenging requirement, especially when taking into account local enforcement norms and customs. In light of this reality, WRAP will permit full compliance with local laws on working hours to be achieved incrementally, provided that a given facility meets the following conditions: is fully transparent about its working hours; ensures that those hours are all being worked voluntarily, in conditions that protect worker safety and health; compensates all employees in keeping with WRAP Principle 5; and shows improvement toward meeting the working hours' requirements from one audit to the next.*

### **7. Prohibition of Discrimination**

Facilities will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.

*Facilities will ensure that all terms and conditions of employment are based on an individual's ability to do the job, and not on the basis of any personal characteristics or beliefs. Facilities will ensure that any employment decision - involving hiring, firing, assigning work, paying or promoting - is made without discriminating against the employees on the basis of race, color, national origin, gender, age, sexual orientation, religion, disability, or other similar factors (pregnancy, political opinion or affiliation, social status, etc.).*

### **8. Health and Safety**

Facilities will provide a safe and healthy work environment. Where residential housing is provided for workers, either directly by facilities or through labor brokers, facilities will ensure it is safe and healthy housing.

*Facilities will provide a safe, clean, healthy and productive workplace for their employees. Facilities shall prioritize worker health and safety above all else, and proactively address any safety issues that could arise. This will include a wide variety of requirements, such as, ensuring, among other things, the availability of clean drinking water (at no charge to workers), adequate medical resources, fire exits and safety equipment, well-lighted and comfortable workstations, clean restrooms. Further, facilities shall adequately train all their workers on how to perform their jobs safely.*

### **9. Freedom of Association and Collective Bargaining**

Facilities will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining.

*Facilities will respect the freedom of each employee to choose for him- or her-self whether or not to join a workers' association. Facilities cannot discriminate against workers based on whether or not they choose to associate. Both the facility and the workers shall ensure they conduct themselves in accordance with all relevant laws in this regard. Facilities will ensure an effective mechanism is in place to address any workplace grievances.*

### **10. Environment**

Facilities will comply with environmental rules, regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

*Facilities will ensure compliance with all applicable legally mandated environmental standards, and should demonstrate a commitment to protecting the environment by actively monitoring their environmental practices. In particular, facilities will ensure proper waste management, including monitoring the disposal of any waste material - whether solid, liquid or gaseous - to ensure such disposal is done safely and in a manner consistent with all relevant laws. Facilities are encouraged to minimize their impact on the environment by applying the principles of reduce, reuse and recycle throughout their operations.*

### **11. Customs Compliance**

Facilities will comply with applicable customs laws, and in particular, will establish and maintain programs to comply with customs laws regarding illegal transshipment of finished products.

*Facilities will ensure that all merchandise is accurately marked or labeled in compliance with all applicable laws. In addition, facilities will keep records for all materials and orders, as well as maintain detailed production records.*

### **12. Security**

Facilities will maintain appropriate procedures in order to ensure proper corporate security, transportation security, and people and physical security at the facility.

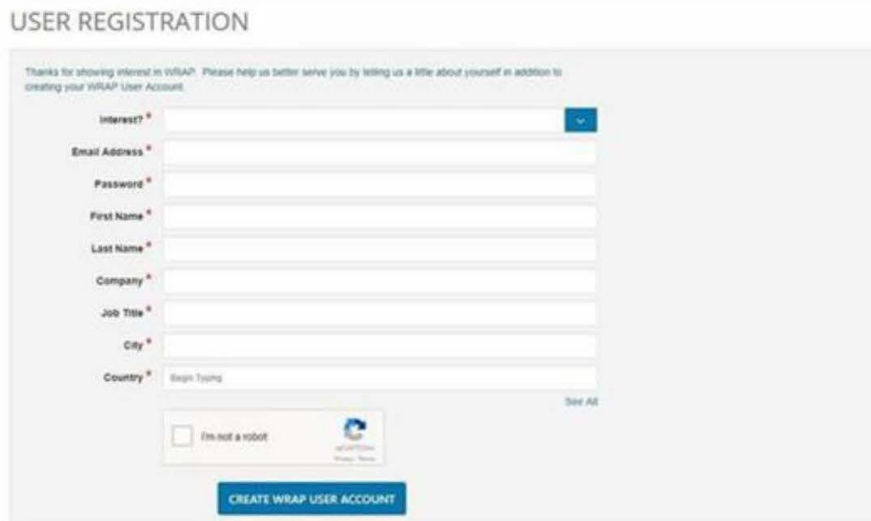
*Facilities will ensure adequate controls are in place to safeguard against introduction of any non-manifested cargo. In this regard, WRAP recognizes the United States Customs and Border Protection (CBP)'s CTPAT Guidelines for Foreign Manufacturers as minimum requirements and has adopted those guidelines under this Principle.*

## Appendix 3: Facility Registration Instructions

- A. Log in at <https://my.wrapcompliance.org/pages/default.aspx>



- a. First time users should follow the New User Registration link to register to the platform



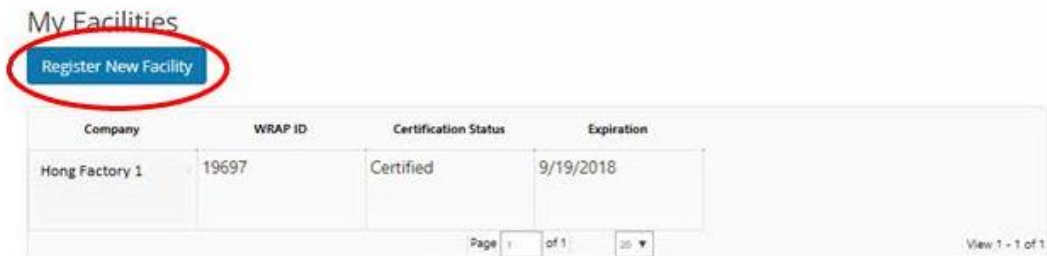


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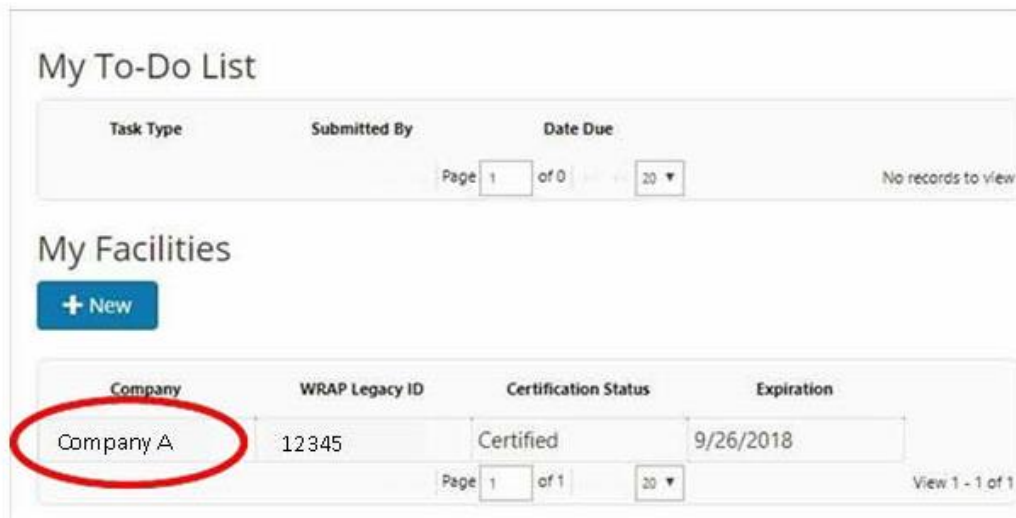
- B. After logging in, click on 'My Dashboard' to access any existing WRAP facilities or to register a new facility



- a. For NEW or LAPSED Facilities: To begin the registration process, click on 'Register New Facility'



- a. For RENEW Facilities: Click on the company name for the designated facility



## Appendix 4: Uploading the PASA

If the document was not uploaded during the initial application process, click on the company name from the 'My Dashboard' page.

My Open Invoices  
My Paid Orders

FACILITY)

**(2) Existing Facility - Renew Application**  
If you have already registered a Facility (its name appears in your list below) and want to submit an Application for Certification, please begin by selecting your existing Facility from the list below and then click **Apply for Certification** under the Application Tab on the Facility's Dashboard page.

A Facility will only be available to RENEW their certification - - 90 days prior to the current Certification End Date.

*If your Facility already has an application in process, you cannot submit a new Application until after it has been Certified.*

**My Facilities**  
Register New Facility

Company	WRAP ID	Certification Status	Expiration
Company A	12345		

Page 1 of 1 20 View 1 - 1 of 1

Under the 'Applications' tab, there is a column labelled 'Self-Assmnt?' If the document was not successfully uploaded, the field will display a 'No.' Click on 'No' and the upload screen will appear.

Facility Summary

Facility Name: [Redacted]  
WRAPID: [Redacted]  
Parent Company: [Redacted]  
Full Address: [Redacted]  
Contact: [Redacted]  
Business Phone: [Redacted]  
Email Address: [Redacted]  
Website: [Redacted]

Certification Information

Status:  
Type:  
Issued:  
Expires:

EDIT

Applications Non-Compliances Contacts Addresses Notes Orders

Type	Status	Appl Date	Psymt Exp Date	Appl Exp Date	Monitoring Firm	Cert Exp Date	Self-Assmnt?
New	Auditing	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	No

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Once the file is selected, click 'Submit Document'



## UPLOAD SELF-ASSESSMENT

- Documents for Audits
- My Info
  - My Profile
  - My Training
- Orders
  - My Cart
  - My Open Invoices
  - My Paid Orders

*You may upload your Self-Assessment from this form. If you are ready to submit, select Yes for "Is Self-Assessment Complete?". You will then be allowed to Upload Attachment. Once you've attached your document, click the Submit Document button below. You will be returned to your Facility Dashboard.*

Document Type SELF-ASSESSMENT

Self-Assessment Complete \* Yes

Self-Assessment Complete?

Upload Attachments  No file chosen

**Appendix 5: WRAP's Name-Address Change Form**



**WRAP Facility Name/Address Change Form**

**Note: Facility must provide a copy of the recent business license with this form**

Original Name of the Facility		
Facility's WRAP ID		
Facility's Contact Person Name		
Title of Contact Person		
Phone/Email		
Original Facility Address	Street Address	
	City	State
	Zip/Postal Code	Country

**Facility's New Name (If Applicable)**

New Name	
----------	--

**Facility's New Address (If Applicable)**

New Address	Street Address	
	City	State
	Zip/Postal Code	Country

Name and Title: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Document Name: WRAP Facility Name/Location Change Form  
 Issue Date: February 9, 2021

### Appendix 6: Guidelines to Complete a WHAP

#### [WHAP 3.0 Guidelines on WRAP's Website](#)

### Worldwide Responsible Accredited Production (WRAP)

#### **Guidelines to Working Hours Action Plan 3.0** **(Effective date July 20, 2020)**

**Working Hours Action Plan (WHAP)** is a tool to help facilities that experience challenges with excessive working hours define an action plan to systematically reduce overtime hours. The overall goal is to work towards attaining full compliance with the local laws.

**The Guidelines** to WHAP 3.0 help facilities fill out Sections I & II and auditors assess them and provide comments in Section III. Compared with WHAP 2.0, WHAP 3.0 no longer requires having *average* weekly hours as a target. Instead, facilities set a target for the observation raised. If there is more than one observation, the facility has the freedom to choose whichever one as the target.

#### General Guidelines

1. All WHAPs shall be submitted in **WORD** format. Auditors upload the WHAP to WRAP's Certification Management Platform when submitting a Recommendation Report.
2. All numbers reported in WHAP shall be either a whole number or rounded up to the **FIRST decimal point**, e.g., 13.5.
3. If a facility has more than ONE observation in Section I, the facility **ONLY** needs to choose **ONE** to set a reduction target to achieve over the next 12 months.
4. When setting a new reduction target(s) in **Column e** of **Section I**:
  - a. For a new/lapsed facility, the target must show improvement from the current hours;
  - b. For a renew facility, if it has reached its last year's target, its new target must be lower than its current hours. If the facility has not achieved its target, they must demonstrate that they have taken the improvement actions proposed in last WHAP. Their new target must show improvement from the current hours.
5. The reduction target(s) should be realistic and achievable. This is the target facility must aim to reach by next certification cycle, so the target **should** be reasonable.

NOTE: When proposing improvement actions, the facility should be very careful not to make any discriminating statements, such as "hire more male employees", "will not hire employees over 50 years old", etc.

6. **Auditors** must review Sections I to II and provide assessment in Section III. Refer to those sections for the detailed instructions on how to assess a WHAP.

Note that WRAP assesses WHAPs based on many factors, e.g. whether a target is realistic, whether the improvement plans are detailed and specific, whether the facility achieves the target set the previous year (if not, is it by a big margin), etc.

## Instructions to Fill out and Assess WHAP 3.0

<b>1. Facility name:</b>			
<b>2. Facility WRAP ID #:</b>		<b>3. Country:</b>	
<b>4. Facility type:</b>	<input type="checkbox"/> New certification A facility applies for WRAP certification for the first time.	<input type="checkbox"/> Renew A returning facility that is/was certified within the past 12 months.	<input type="checkbox"/> Lapsed Certificate expired for more than 12 months and no audit activities took place during the period.
<b>5. Latest onsite audit date(s):</b> e.g.: June 1 - 2, 2020	The most recent WRAP onsite audit date.	<b>6. WHAP from prior certification:</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No If your facility has submitted a WHAP before, check Yes. Otherwise, check No.

### Section I. Working Hours, Observations Noted, and Reduction Target

Facility must fill out *Column a* through *d* below and set a reduction target in *Column e*. If there is more than one “Yes” in *Column c*, the facility has the freedom to choose whichever one to set a reduction target in *Column e* to achieve in the next 12 months. When choosing a target, consider which one the facility feels most confident to make an improvement on. The target will be used to measure the facility’s success in reducing hours during the next certification audit.

- “Yes” Observation(s) found
- “No” No observation(s) found
- “N/A” No applicable local laws

Below is an example of a facility with both daily and weekly working hours exceeding the limits set by the local laws. The facility has the freedom to choose ONE as a target to reduce its working hours. The facility chooses daily working hours of 13 as the target to achieve in the next 12 months.

	<i>a. Legal regular working hours</i>	<i>b. Legally allowed overtime hours</i>	<i>c. Any excessive overtime hours raised as observation</i>	<i>d. Highest hours observed (Taken from Principle 6 Initial Audit)</i>	<i>e. Reduction target (fill ONE only)</i>

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			(Yes, No or N/A)	report)	
7. <b>Daily:</b>	8	4	Yes	13.5	13
8. <b>Weekly</b>	48	24	Yes	75	
9. <b>Monthly:</b>		N/A	N/A		
10. <b>Quarterly:</b>		N/A	N/A		
11. <b>Yearly:</b>		N/A	N/A		
12. <b>Others:</b>		N/A	N/A		

In this example, the facility has two observations but chooses **daily** hours as their target.

The facility then used the daily target to fill out Section II A Column b **Highest** Working Hours.

### Section II A. List Top Three (3) Main Processes with HIGHEST Working Hours

**(No need to list the processes if their hours do not exceed legal limit.)**

The purpose of this section is to help facility identify “bottle neck” in its production processes. Facility provides the top three (3) processes that have observations raised under Principle 6 Hours of Work (e.g., sewing, linking, or packing). If less than 3 processes have excessive hours, put “N/A” in the rest of *Column a*.

“Highest Working Hours” of the processes refers to *Section I e* above.

	<i>a. Processes</i>	<i>b. HIGHEST working hours of the target chosen in Section I e above:</i>	<i>c. Two periods with highest working hours in b:</i>
13. <b>Process 1:</b>	Cutting	Daily 13.5	Jan 24, 2020 Feb 28, 2020
14. <b>Process 2:</b>	Sewing	Daily 13.5	Jan 25, 2020 Feb 18, 2020
15. <b>Process 3:</b>	N/A		

### Section II B. Root Causes for Excessive Hours and Improvement Actions

Analyze the root causes of excessive overtime in your facility and list them one by one below in the left column. In the right column, there should be a respective improvement action(s) for each root

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cause to help achieve the reduction target set in *Column e* of *Section I*. Your improvement actions must be **SMART** (*S=Specific, M=Measurable, A=Achievable, R=Reasonable and T=Target Oriented*). For example, if you are planning to upgrade machines, list what type(s) and how many you are planning to upgrade.

Maintain related documents and records so that WRAP auditors can verify them during next recertification audit.

<b>16. Root Causes</b>	<b>17. Improvement Actions</b> (Actions must be specific. e.g., management will hire about 15 sewing workers within 30 days to reduce the hours in sewing department.)
a.	
b.	
c.	
<b>18. Facility responsible person(s)' name &amp; date:</b>	

### Section III. Recertification Status (TO BE COMPLETED BY AUDITOR ONLY)

<b>19. Has facility achieved the recertification target(s) set in last WHAP, if applicable?</b>		a. Target Set in Last WHAP	b. Target achieved (Yes, No or N/A)
	Daily		
	Weekly		
	Monthly		
	Quarterly		
	Yearly		
<b>20. a. Provide any comments on the improvement action taken by facility (as compared with last WHAP), if applicable:</b>	<p>Refer to the last WHAP submitted by facility. If last certification audit was conducted by another Monitoring Firm, contact WRAP to obtain the previous WHAP before conducting the audit.</p> <p>Review and comment if/how improvement actions proposed in last year's WHAP have been implemented. Request the facility provide evidence to substantiate that the improvement actions have been taken.</p> <p>For recertification facilities, review and comment if this year's proposed improvement actions are acceptable.</p>		
	<b>b. If this is the facility's first WHAP, are the improvement actions proposed in Q17 acceptable?</b>	<input type="checkbox"/> Yes Provide reasons:  <input type="checkbox"/> No Provide reasons:	



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	Review and comment if this year's proposed improvement actions are acceptable.
<b>21. What is the facility's average weekly working hours (data should be taken from Principle 6 on initial audit report)?</b>	
<b>22. Auditor's name and date reviewed.</b>	By printing his/her name and date reviewed here, auditor is confirming that they have reviewed Sections I through III thoroughly and found them to be in accordance with WRAP Guidelines.

### Section IV. Interim WHAP Status

**(TO BE COMPLETED BY FACILITY 6 MONTHS AFTER CERTIFICATION)**

*Column a* below is the highest working hours of all departments over the last six months. The purpose is to update WRAP on your progress towards achieving the reduction target. Choose whichever highest daily/weekly/monthly/quarterly/yearly hours applicable to your facility.

The date in *Column b* is the date your facility completes and submits this interim WHAP to WRAP.

<b>Complete whichever that applies</b>	<b>a. Interim status on highest working hours during the past 6 months (whichever applies)</b>	<b>b. Date of Reporting</b>
<b>23. Daily</b>		
<b>24. Weekly:</b>		
<b>25. Monthly:</b>		
<b>26. Quarterly:</b>		
<b>27. Yearly:</b>		
<b>28. Other:</b>		

## Appendix 7: Risk Assessment Template

[Risk Assessment Template on WRAP's Website](#)

Process	STEP 1		STEP 2		STEP 3		STEP 4			STEP 5
	Activity	Hazard	Risk (R)	Harm	Severity (S)	Risk Rating (RXS)	Controls	Records	Responsibility	
Layering or Spreading	Moving across the tables	Sharp edges of tables	3	Bodily injury - cuts	2	6	1. Installation of an automatic spreader. 2. Training for cutting workers and defining work instruction. 3. Monitoring and maintenance of the spreader. 4. Cushioning the sides of the cutting tables.	1. Training records. 2. Work instruction. 3. Maintenance records of the spreader. 4. Monitoring of the side table record.		
	Handling weights for fabric pressing	Loose wires at the floor	3	Bodily injury - fall	2	9				
	Bending over to straighten the fabric	Weight that could on a foot	3	Bodily injury - foot fracture	3	9				
		Ergonomical hazard	2	Back pain	2	4				
Cutting	Using the electric cutting machine	Faulty connections that cause electrocution	3	Death	3	9				
		Sharp blades	3	Loss of body part	3	9				
Security	Handling guns	Accidentally firing the gun	1	Death	3	3				
	Risk	Severity	Rating		Types of Controls	Objective	Details			
	Very Likely/Ongoing or daily process	Death/loss of body part	3		Engineering	Elimination of hazard or substitution of process	Use of technology to either remove the hazard completely or substitute it with lower risk hazard, or to create a barrier between the worker and the hazard.			
	Likely/once in a week	Absenteeism from work/Hospitalization	2		Administrative (to be applied if engineering control is not feasible)	Reduction of severity of hazards that cannot be eliminated	Provide trainings for workers exposed to hazards so that they carry out the activity safely. Subsequently, monitor the activity on regular basis.			
	Unlikely/rare or non-routine event	Minor first aid/Rest at workplace	1		Other (to be applied if engineering and administrative controls are not sufficient)	Protection when hazard cannot be reduced any further	Provide appropriate, adequate, and conditionally-monitored Personal Protective Equipment (PPE) to workers directly and indirectly exposed to a hazard.			

