

Sweatfree Purchasing Consortium

Guidelines for Initiating Factory Investigations

Members of the Sweatfree Purchasing Consortium (SPC) may initiate, conduct, and pay for their own factory investigations following their own guidelines. A member may also issue a purchase order for an investigation against a public contract with an independent monitor, directing the monitor to bill the SPC, assuming SPC approval. The SPC will strive to support members' own investigations as appropriate, providing relevant supply chain information, sharing findings among members, and offering forums for education and discussion.

The SPC can also itself contract with an independent monitor to conduct investigations relevant to members' needs. These guidelines are intended for investigations that are initiated and paid for by the SPC using its own general operating revenue. For the purpose of these guidelines, investigations that are initiated and paid for by the SPC are "SPC-sponsored investigations."

Criteria

The SPC can sponsor factory investigations either as a *response to credible complaints* from workers, local organizations, or others; or *proactively*, when there is compelling information or reason to believe an investigation would be useful. All SPC-sponsored investigations must be relevant to at least one member. In addition, at least one of the following criteria must be met:

- A complaint must be credible and pertain to members' code of conduct violations.
- A particular factory is an especially important source of public sector apparel, but little information is available about the working conditions.
- A major public sector vendor or brand is using a particular factory for production for members and has a record of serious labor violations at other factories.
- There is a program in place to work with a vendor to improve conditions in their factories.

Process and Decision Making

When the SPC receives a complaint of a code of conduct violations either directly from a source with first-hand or second-hand information about working conditions in a particular factory, or via a member who has received such a complaint, the SPC will consult its database and/or other members to determine if the complaint is relevant to other members.

If the SPC determines that the complaint is relevant to at least one member and pertinent to its code of conduct, the SPC shall consult with knowledgeable local organizations about the credibility of the complaint and the importance of public sector production for the factory. If the SPC determines that the complaint is credible, pertinent, and relevant to at least one member, it may sponsor an investigation. Whether or not public sector apparel production is an important enough part of a factory's overall output to give SPC members significant leverage to help correct any violations may also influence the decision to sponsor an investigation, but will not be a determining factor on its own. The SPC may also elect to initiate a proactive investigation in the absence of a complaint, where there is good reason to believe it would further the goals of the organization.

Investigations may vary in scope and extent, depending on the problems identified and the needs of members. There may be instances where a quick assessment of the factory is sufficient in order to gather some specific facts and others where a more in-depth and on-going monitoring and remediation program is required. All SPC-sponsored investigations will be conducted by member-approved monitoring groups or directly by SPC staff for brief and simple fact finding cases when that is economically and logistically advantageous. Where independent monitoring groups are engaged, they shall submit a written monitoring plan to the Executive Director for discussion and approval before the investigation begins, and shall submit regular reports as requested.

To ensure timely investigations, the Executive Director shall have the authority to decide on sponsorship, using general SPC funds, and following the investigation guidelines established by the Board of Directors. The Executive Director shall provide timely updates to the Board on all SPC investigations and monitoring activities.