



LWG Leather Manufacturer Audit Protocol (P7)

Social Scheme Recognition Requirements

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Introduction of Social Auditing in P7

Section 3, Social Auditing of the LWG Leather Manufacturer Audit Protocol seeks to determine if the organisation can demonstrate social responsibility through independent assessment.

The list of recognised social audit and certification schemes may be expanded on application to and approval by LWG. This section will become critical in future versions of the protocol.

LWG recognised social audit and certification schemes and auditing organisations are listed on the LWG website:

<http://leatherworkinggroup.com/our-impact/social-responsibility/>

To meet the requirements of **Protocol 7 – Section 3 Social Audit** a leather manufacturer must have undergone an LWG recognised social assessment. For a social audit or certification scheme to be recognised it must be assessed as meeting the LWG social assessment requirements.

The intention is to adopt the use of industry recognised benchmarks, criteria and standards wherever possible while allowing for as broad a range of scheme recognition as possible.

For a scheme to be recognised there are two sets of criteria that must be met.

Social Performance Requirements

These define the social standards against which the audit, assessment or certification is undertaken. The scope of these covers all core social and labour elements. The social criteria are taken from the Consumer Goods Forum SSCI benchmark requirements for processing and manufacturing facilities. These were developed through extensive consultation and review across a wide range of industry sectors and geographies.

Scheme Management Requirements

These define the requirements for the operation of the audit or certification scheme. These are essential to ensure and demonstrate the integrity and credibility of the audit or certification scheme and processes. While these are also based on the Consumer Goods Forum SSCI benchmark requirements it is recognised that it is not feasible to verify all requirements without going through the formal benchmark process. These are therefore a subset of those that can more readily be verified by LWG to demonstrate the robustness of controls and processes in the scheme operation.

LWG encourages all audit and certification schemes to undertake the relevant Consumer Goods Forum SSCI benchmark to demonstrate they meet industry expectations for their scope.

Social & Labour Convergence Program (SLCP)

LWG recognises the benefits from the increasing adoption and use of the SLCP data collection and verification process across the apparel and footwear sector including for the social assessment of tanneries and is keen to support this. While the SLCP is standard agnostic, the processes by which data is collected and verified can be shown to adequately meet the LWG Scheme Management requirements. The LWG will therefore recognise audit and certification schemes that utilise SLCP verified data as their input where such schemes can be demonstrated to meet the LWG Social Criteria and Audit requirements set out in Part 1 and Part 3 of this document respectively. Unverified self-assessment or joint assessment data is not accepted as a valid input to schemes recognised by the LWG.



PART 1 – SOCIAL CRITERIA REQUIREMENTS

The social criteria requirements set out for recognition of schemes by the Leather Working Group are based on those developed and published by the Consumer Goods Forum Sustainable Supply Chain Initiative for the processing and manufacturing scope.

The term worker is used as defined in ISO 45001:

Worker: A person performing work or work-related activities that are under the control of the organization (3.1)

Note 1 to entry: Persons perform work or work-related activities under various arrangements, paid or unpaid, such as regularly or temporarily, intermittently, or seasonally, casually or on a part-time basis.

Note 2 to entry: Workers include top management (3.12), managerial and non-managerial persons.

Note 3 to entry: The work or work-related activities performed under the control of the organization may be performed by workers employed by the organization, workers of external providers, contractors, individuals, agency workers, and by other persons to the extent the organization shares control over their work or work-related activities, according to the context of the organization.

1.1 Management System

1.01	The standard shall require that a written human rights policy statement is in place, approved at the most senior level.
1.02	The standard shall require that the human rights policy statement is communicated to all personnel.
1.03	The standard shall require that clear responsibility is assigned for the implementation of the human rights policy statement.
1.04	The standard shall require that personnel in relevant business functions receives adequate training on human rights. Training attendance shall be documented.
1.05	The standard shall require that the requirements on human rights are communicated to relevant business partners and other relevant parties.
1.06	The standard shall require that records and documentation are maintained to demonstrate compliance with the standards' requirements.

1.2 Legislation

2.01	The standard shall require that all applicable national legal requirements are complied with.
2.02	The standard shall require that if applicable national legal requirements set a different level of adherence than set by the standard, the standard shall require that whichever affords the highest level of protection for workers is audited against.

1.3 Forced Labour

3.01	The standard shall require that the facility does not engage in, support or tolerate forced labour. All workers shall enter into employment voluntarily and may terminate employment with reasonable notice.
3.02	The standard shall require that the facility does not force any person to work under the menace of any penalty or sanction.
3.03	The standard shall require that no involuntary prison labour is used.
3.04	The standard shall require that no fees or related costs are charged (directly or indirectly, in whole or in part) to applicants and workers for services directly related to recruitment that may lead to situations of forced or compulsory labour.
3.05	The standard shall require that no monetary deposits, financial or collateral guarantees or personal possessions are demanded as a condition of employment.
3.06	The standard shall require that workers are not held in debt bondage or forced to work for an employer, or any other entity to pay off debt.
3.07	The standard shall require that if the possibility of advances and loans to workers is provided, a written policy about the terms and conditions is in place that is communicated to workers in an understandable manner. These terms (and related interest rates) shall not be used to bind workers to employment.
3.08	The standard shall require that no personal documents or any valuable possessions, such as identity or immigration papers, work permits or travel documents are confiscated, retained, nor shall workers be required to lodge them with the employer and/or recruiter.
3.09	The standard shall require that if a secure storage option for personal documents and valuable possessions is provided, it shall be ensured that: <ol style="list-style-type: none"> it is the choice of the worker to utilise the storage; storage is documented; and workers have free access to their possessions
3.10	The standard shall require that the facility demonstrates that, when employment agencies are used, they are required to: <ol style="list-style-type: none"> be compliant with applicable national legal requirements; be licensed or certified by the competent national authority, if applicable; be compliant with The standards' requirements on forced labour and recruitment fees; not engage in fraudulent or corrupt recruiting practices.
3.11	The standard shall require that the facility does not restrict worker's freedom of movement. The facility shall not require workers to remain at the workplace at the conclusion of their working hours or confine them in any worker accommodation.
3.12	The standard shall require that if cases of forced or compulsory labour have been found, the organisation shall implement effective remediation, such as compensation for personal and material damages. The remediation actions taken shall be verified and recorded.

1.4 Child Labour

4.01	<p>The standard shall require compliance with the minimum age for work as defined by applicable national legal requirements or the age of completion of compulsory education, whichever is higher. The minimum age for work shall not be less than 15 years.</p> <p>If however, local minimum age law is set at 14 years of age in accordance with ILO Convention 138, this lower age may apply.</p> <p>The Standard may allow for the exceptions of performing light work when in accordance with ILO Convention 138 and in line with applicable national legal requirements.</p> <p>The Standard shall require that details on any children under the age of 15 years that are found to be working at the facility are reported in the audit or assessment report.</p>
4.02	<p>The standard may allow for training/apprenticeship standards and shall verify that these are not exploitative and are in line with applicable national legal requirements</p>
4.03	<p>The standard shall require that young workers under 18 are not employed at night or in hazardous conditions.</p>
4.04	<p>The standard shall require that age verification mechanisms are established for all workers and valid age verification records are maintained.</p>
4.05	<p>The standard shall require that if child labour was found, effective remediation procedures are in place that put the best interest of the child first.</p> <p>The remediation plan shall be documented and verified, and actions put in place to avoid recurrence.</p>

1.5 Freedom of Association

5.01	<p>The standard shall require that workers have the right to join or form trade unions or other worker organisations of their own choosing - or refrain from doing so - and to bargain collectively in accordance with applicable national legal requirements</p>
5.02	<p>The standard shall require that worker representatives or members of trade unions are not discriminated against or otherwise penalised because of their membership in or affiliation with a trade union or worker organisation in accordance with applicable national legal requirements.</p>
5.03	<p>The standard shall require that duly elected worker representatives of trade unions and other worker organisations have access to the workplace to carry out their representative functions in accordance with applicable national legal requirements.</p>
5.04	<p>The standard shall require that where there are no legal protections for the right to collective bargaining or freedom of association, the facility strives to engage workers through alternative lawful mechanisms of engagement to allow worker representatives to enter into a dialogue about workplace issues.</p>

1.6 Discrimination / Fair treatment of workers

6.01	The standard shall require that equal opportunities and treatment in employment and occupation are respected. Workers shall not be discriminated in recruitment or employment practices based on any legally protected characteristics, and any personal characteristics that do not interfere with a worker's ability to do a specific job.
6.02	The standard shall require that the facility does not engage in, support or tolerate the use or threat of corporal punishment, mental or physical coercion, bullying, harassment, including sexual harassment, or abuse of any kind.
6.03	The standard shall require that written disciplinary procedures are in place and they are effectively communicated to workers.
6.04	The standard shall require that records of all disciplinary action are kept.

1.7 Operation Health & Safety (OHS)

7.01	The standard shall require that safe, healthy and clean conditions are provided in all workplaces, worker accommodation, and other facilities as provided or mandated.
7.02	The standard shall require that clear responsibility for the development, implementation and performance of the occupational health and safety management system and the achievement of the relevant occupational health and safety objectives is allocated.
7.03	The standard shall require that all members of the facility receive effective health and safety training as required to carry out the duties and responsibilities of the job. Health and safety training is provided timely and repeated on a regular basis. It shall also be repeated for new or reassigned members of the facility and when changes in the process or machinery present new risks. All trainings shall be documented.
7.04	The standard shall require that health and safety training is provided to all members of the facility at no cost. Trainings shall take place during remunerated working hours.
7.05	The standard shall require that risk assessments are performed as appropriate to detect and assess potential threats to the health and safety of workers and effective measures are taken to address the findings from the risk assessment.
7.06	The standard shall require that the facility maintains written records of all health and safety incidents in the workplace and all other facilities, as provided or mandated.
7.07	The standard shall require that the cause of health and safety incidents is determined when they occur. Appropriate corrective actions are taken to prevent recurrence of similar incidents.
7.08	The standard shall require that appropriate and effective personal protective equipment (PPE) is provided as needed. PPEs shall be provided free of charge to the workers. PPEs shall be maintained and replaced as necessary. Workers shall be instructed and monitored on its proper use.
7.09	The standard shall require that clear arrangements for providing first aid and medical assistance are in place for any workplace accidents or incidents.

7.10	The standard shall require that all workers are provided with free potable water and clean toilet facilities.
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1.8 Building Safety & Emergency Preparedness

8.01	The standard shall require that adequate documented emergency and fire safety procedures are in place, including in worker accommodation and other facilities as provided or mandated.
8.02	The standard shall require that all employees are trained on emergency and fire safety procedures.
8.03	The standard shall require that fire exits, escape routes, firefighting equipment and fire alarms are properly marked according to national and industry standards. Fire exits and escape routes are open, accessible and clear of obstacles so as to permit safe evacuation in case of an emergency.
8.04	The standard shall require that workers have the right to remove themselves from imminent serious danger without seeking permission.
8.05	The standard shall require that appropriate measures are taken to evaluate and monitor the strength, stability and safety of buildings and equipment, including worker accommodation where provided or mandated. Corrective action is taken where required.
8.06	The standard shall require that if accommodation facilities are provided or mandated, these are located separately from production or storage facilities.

1.9 Wages

9.01	The standard shall require that workers are informed about their employment terms and conditions in writing and in an understandable manner to the worker before they enter into employment.
9.02	The standard shall require that work be performed by individuals with a formal verifiable working relationship in accordance with applicable national legal requirements
9.03	The standard shall require that no employment arrangements are used in order to avoid obligations to workers under applicable national labour and social security laws.
9.04	The standard shall require that compensation for standard working hours meets or exceeds applicable legal minimum wages, industry standards or collective bargaining agreements (where applicable).
9.05	The standard shall require that wages are paid regularly, in a timely manner and in full. All payments are made directly to the employee in legal tender or into a bank account in their name.
9.06	The standard shall require that where a facility establishes a pay rate for production, quota or piece work, it allows workers to earn at least a wage which respectively meets or exceeds applicable legal minimum wages, industry standards, or collective bargaining agreements (where applicable) within standard working hours.

9.07	The standard shall require that all workers are compensated for all overtime as required by applicable national legal requirements or a collective bargaining agreement.
9.08	The standard shall require that all workers are provided with clear and written details of their wages for the pay period concerned each time that they are paid.
9.09	The standard shall require that no deductions from wages are made unless permitted by applicable national legal requirements or a collective agreement. Workers are informed about any deductions in writing and in an understandable manner to the worker.
9.10	The standard shall require that no deductions from wages are made as a disciplinary measure.

1.10 Working Hours

10.01	The standard shall require that standard working hours conform to applicable national legal requirements, collective agreements, or industry standards, but shall not exceed 48h, excluding overtime. If applicable national legal requirements set total working hour limits greater than 60h per week, including overtime, the Standard shall require that total hours worked are reported in the audit or assessment report.
10.02	If the standard grants exceptions to the limit of total weekly working hours, these shall be clearly defined, in line with applicable national legal requirements, and the standard shall require that the facility demonstrates that appropriate safeguards are taken to protect the worker's health and safety.
10.03	The standard shall require that workers agreed to work overtime and that overtime requirements do not result in forced labour.
10.04	The standard shall require that overtime is not requested on a regular basis.
10.05	The standard shall require that all workers have the right to breaks during work shifts.
10.06	The standard shall require that workers have the right to at least one rest day of 24 consecutive hours in every week.
10.07	If the standard grants exceptions to the number of rest days, these shall be clearly defined, in line with applicable legal requirements and it is demonstrated that appropriate safeguards are taken to protect the worker's health and safety. At a minimum, workers shall be granted 2 rest days, each of consecutive 24 hours, in a 14-day period.
10.08	The standard shall require that workers are granted paid leave (public and annual holidays, maternity/paternity leave, sick leave, etc.) in accordance with applicable national legal requirements.

1.11 Grievance Mechanism

11.01	The standard shall require that a written procedure to address complaints or concerns is established. The grievance mechanism shall be accessible to all workers and external parties.
11.02	The standard shall require that the confidentiality of any complaint raised is provided, and information is revealed only as necessary to investigate and handle the complaint.
11.03	The standard shall require that no worker or external party that lodged a complaint in good faith is retaliated against.

1.12 Business Ethics

12.01	The standard shall require that the facility prohibits any involvement in any act of corruption, extortion, embezzlement, nor in any form of bribery - either directly or indirectly.
12.02	The standard shall require that the facility does not falsify any information regarding their activities, structure and performance and is not involved in any act of misrepresentation in the supply chain.

PART 2 – SCHEME MANAGEMENT REQUIREMENTS

Section A covers the internal elements for audit and certification schemes while Section B pertains to the audit firms used by the scheme. In each case these are a subset of the Consumer Goods Forum Sustainable Supply Chain Initiative Scheme Management requirements that can be more readily assessed without requiring a scheme to undertake the formal benchmarking process. These represent a minimal set of criteria to ensure the independence, credibility, and integrity of schemes to initially be recognised by the LWG.

A1. Scheme Governance

A1.01	The Scheme Owner shall be an organisation that is a legal entity, which could be held legally responsible for the schemes' operations.
A1.03	The Scheme Owner shall have adequate arrangements to cover liabilities arising from its operations.
A1.05	The Scheme Owner shall have in place a publicly available appeals and complaints resolution procedure and shall require this from approved audit firms and accreditation bodies. Each procedure shall require the respective body to: <ul style="list-style-type: none"> – investigate and take appropriate action regarding relevant complaints, within defined timelines; – review and take any necessary corrective actions; and – keep a record of all complaints and resulting actions.

A2. Scope and Objectives

A2.01	The Scheme Owner shall have a defined scope for auditing under its scheme.
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A5. Standard Setting and Maintenance

A5.01	The Scheme Owner shall have a document control procedure in place to ensure that all of the scheme's normative documents are appropriately controlled and publicly available.
A5.06	The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.
A5.07	The Scheme Owner shall prepare sufficient guidance on the standard to support consistent interpretation of its requirements.

B1. Accreditation

B1.01	The Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme.
B1.02 A	In the event that an audit firm is not yet accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to achieve ISO accreditation. If a transition period is granted, it shall not exceed two years.
B1.02 B	In the event where an audit firm is not eligible to be accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner shall have procedures in place for a clearly defined and publicly available audit quality programme. The audit quality programme must include: <ul style="list-style-type: none"> a) a designated person / persons in charge of the programme; b) an audit sampling methodology; c) a shadow audit policy and procedure; d) any additional objective measures to ensure that the audit firm is able to conduct audits in accordance with the policies and procedures established by the Scheme Owner.
B1.03	The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of the current version of ISO/IEC 17011.
B1.04	The Scheme Owner specifies the requirements for audit firms that the accreditation body is required to verify.

B2. Relationship with Audit Firms

B2.01	The Scheme Owner shall ensure that audit firms that are approved to operate their scheme are legal entities.
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B3. Auditor Competence

B3.01	The Scheme Owner shall define the qualifications and competence criteria required of auditors.
B3.02	The lead auditor performing audits for the audit firm shall have the following experience: <ul style="list-style-type: none"> - a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days. <p>OR</p> <ul style="list-style-type: none"> - a minimum of 2 years' experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components.

	<p>OR</p> <ul style="list-style-type: none"> – a detailed combination of minimum relevant experience in social compliance, trainings, and social compliance audit days that are publicly available and consistent with standard industry practices & norms.
B3.03	In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.
B3.08	The Scheme Owner shall require that if an audit firm sub-contracts any work to another party, a legally enforceable agreement between the audit firm and the sub-contracted party is in place to ensure the sub-contracted party adheres to the same policies, procedures and competence requirements when auditing against the scheme

B4. Audit Protocol

B4.01	The Scheme Owner shall define the methodology to assess compliance with the standard and require audit firms to apply this methodology consistently.
B4.02	The Scheme Owner shall require that the scope of the audit includes an on-site assessment of the main site and all other pertinent off-site locations, including accommodation facilities, where provided or mandated.
B4.03	The Scheme Owner shall define a procedure for audit firms to determine the number and selection of pertinent locations.
B4.04	<p>The Scheme Owner shall have a clearly defined and documented audit frequency programme. The maximum validity of an audit or certificate shall not exceed 3 years.</p> <p>The Scheme Owner shall require audit firms to carry out periodic surveillance audits at sufficiently close intervals to verify compliance with the standards' requirements. The rationale behind these intervals shall be clearly defined and transparent.</p>
B4.05	The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the audit firm shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.
B4.06	The audit shall take place during a period when the employment site is in normal operation. Resulting variations to audit frequency shall be clearly defined and documented.
B4.07	The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit that audit firms are required to follow during the audit. The rationale shall at a minimum include the size of the workforce and should include additional criteria that will ensure the effectiveness of the audit such as the physical size of the location to audit, number of locations, nationalities of the workforce, product lines and product categories, etc.
B4.08	The Scheme Owner shall have in place auditing procedures and guidance for multi-site auditing and requires audit firms to apply the methodology consistently, if allowed under the scheme.

B4.09	The Scheme Owner shall require that audits include worker and management interviews, the observation of processes and activities and the review of relevant documentation and records.
B4.10	The Scheme Owner shall define the methodology for defining the number of workers to be interviewed. Interviewed workers shall reflect a wide range of workers and include potentially vulnerable workers and those in less skilled positions.
B4.11	<p>The Scheme Owner shall define requirements for the execution of worker interviews that audit firms are required to implement. The requirements include at a minimum that:</p> <ul style="list-style-type: none"> – Workers shall be interviewed both individually and in groups – Workers shall be interviewed in a confidential setting without any supervision or management personnel present – Information provided by workers shall be processed in a non-attributable manner – Workers shall be interviewed in their own language – The selection of workers shall consider that they are representative of the factory, by characteristics such as gender, age, length of service and origin – In any event, management, supervisors or their representatives shall not act as interpreters

B5. Audit Reporting

B5.01	<p>The Scheme Owner shall require certificates/audit reports to include, at a minimum:</p> <ul style="list-style-type: none"> – the name and address of the Scheme Owner; – the name and address of the audit firm; – the name and address of the audited site; – the effective date of issue of the certificate/audit report; – the substance (scope of audit) of the certificate/audit report; – in case of certification schemes: the term for which the certification is valid; – signature of the issuing officer.
B5.02	Reports and grading systems shall clearly identify whether audits are announced, semi-announced or unannounced.
B5.03	The Scheme Owner shall require that audit reports shall contain evidence that all the relevant criteria have been checked during the audit. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.
B5.04	<p>The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review. Surveillance audits shall, at a minimum, be reviewed according to a risk-based approach.</p> <p>For the review process to be effective it shall be ensured that:</p> <ul style="list-style-type: none"> – reviewers are impartial and technically capable of understanding the content of reports;

	<ul style="list-style-type: none"> – all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor, – all areas of non-conformity have been identified and supported with clear evidence, – in the case of certification schemes, effective corrective action has been taken to resolve these non-conformities.
B5.05	The Scheme Owner shall define clear procedures in case non-compliances are found that pose an imminent danger to workers.

B6. Follow-Up Action

B6.01	The Scheme Owner shall have a system for the classification of non-conformities that clearly specifies the definition of the different types of non-conformities.
B6.02	The Scheme Owner shall require the auditee to perform a root cause analysis of the non-conformities found.
B6.03	If one or more non-conformities are found, the Scheme Owner shall require the auditee to prepare a corrective action plan, including details on the corrective actions and the time frame in which corrective actions shall be undertaken.
B6.04	Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm. Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.
B6.05	The Scheme Owner shall define clear procedures regarding the follow-up action when non-conformities are found. In the case of certification schemes, all evidence of corrective action shall be submitted, completed and verified by the audit firm, within a timescale defined by the Scheme Owner.
B6.06	In case of certification schemes, the Scheme Owner shall provide audit firms with consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.
B6.07	The Scheme Owner shall require that the audit firm has in place a clearly defined and publicly available appeals procedure.

B7. Data Management

B7.01	The Scheme Owner shall have in place a clearly defined data management system, which will hold and maintain data for the effective management and operation of the scheme.
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