Section 1: General Guidance

1.1: Management Systems

Factories in the ICTI CARE Process should have management systems in place to ensure continued compliance with the ICTI CARE Process requirements. The following are some key indicators of a good management system.

- Qualified Management:
  Factory managers responsible for areas of the ICTI CARE Process should understand the ICTI CARE Process requirements and the local labor laws related of their area.

- Training:
  Management expected to carry out the ICTI CARE Process requirements are professionally trained in their area by an outside party or qualified internal manager. Workers expected to meet requirements, such as proper safety procedures, are trained on the requirement as well as the reason for the requirement.

- Written Documentation of Policies and Procedures:
  Policies and procedures are well documented. Factory management ensures the policies and procedures are routinely updated and distributed to necessary persons and/or posted for employees to see.

- Communication Systems:
  Policies and procedures as well as changes to work schedules (e.g. working hours) or personnel (e.g. change in management) are communicated to employees in a timely manner.

- Complaint Procedure:
  Factories have a transparent complaint procedure. Factory management provides workers with an opportunity to report complaints and responds appropriately to employee grievances.

- Self Evaluation:
  Management routinely checks factory conditions against this ICTI CARE Process checklist to identify any areas of non-compliance and identify risk areas for potential non-compliance.

- Prevention of Non-Compliance:
  When non-compliance or risk of non-compliance is identified, the corrective actions address the immediate problem and prevent future non-compliance.

- Enforcement mechanisms:
  Factories have clear guidelines for factory employees (managers, supervisors, lines workers, etc.) that do follow the ICTI CARE Process or factory policies.
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1.2: Methodology for Evaluating Compliance

While evaluating compliance, the following procedures are deemed necessary:

- Documents Review (including procedures/records review, local laws and regulations check)
- Plant tour on-site
- Interview workers/managements

1. Working Hours
   • Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Conduct random attendance records checks and compare with payroll records
     d. Check any other evidence/records
   • Plant tour on-site
     a. Collect any other evidence/records
   • Interview workers/managements
     a. Interview workers/managements

2. Wages and Compensation
   • Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures (e.g., insurance, medical, accommodation, etc.)
     c. Check payroll records and compare with attendance records
     d. Check any other evidence/records
   • Plant tour on-site
     a. Collect any other evidence/records
   • Interview workers/managements
     a. Interview workers/managements

3. Underage Labor
   • Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Check worker's identification by random sampling
     d. Check personnel record of workers who look particularly young
     e. Check any other evidence/records
   • Plant tour on-site
     a. Identify workers who look particularly young
     b. Collect any other evidence/records
   • Interview workers/managements
     a. Interview workers who look particularly young
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4. **Forced Labor & Prison Labor**
   - Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Check subcontractors list
     d. Check employment records and voluntary overtime practices
     e. Check any other evidence/records
   - Plant tour on-site
     a. Collect any other evidence/records
     b. Perform unannounced visit
   - Interview workers/managements
     a. Interview workers/managements

5. **Disciplinary Practices**
   - Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Check disciplinary records
     d. Check any other evidence/records
   - Plant tour on-site
     a. Collect any other evidence/records
   - Interview workers/managements
     a. Interview workers/managements

6. **Discrimination**
   - Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Check employment records (e.g., recruitment, promotion, termination, etc.)
     d. Check any other evidence/records
   - Plant tour on-site
     a. Collect any other evidence/records
   - Interview workers/managements
     a. Interview workers/managements
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7. Employee Representation
   - Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Check list of employee representation
     d. Check any other evidence/records
   - Plant tour on-site
     a. Collect any other evidence/records
   - Interview workers/managements
     a. Interview workers/managements

   - Documents Review
     a. Check local laws and regulations
     b. Check written factory policy and procedures
     c. Check relevant evidence/records (e.g. certifications, licenses, injury/illness records, accident log, internal inspection records, etc.)
   - Plant tour on-site
     a. Conduct on-site inspection(s)
   - Interview workers/managements
     a. Interview workers/managements