Self-Declaration Procedure

Effective: 1\textsuperscript{st} August, 2013

ICTI Ethical Toy Program is taking the next step to support factory in social compliance and capability building by implementing a self-declaration procedure. Factories are encouraged to develop a self-monitoring system to track their own compliance status between audits.

Ethical Toy Program encourages factories to make use of the self-declaration Procedure as a way to increase transparency and help advance compliance in the toy industry. Factories that discover an instance of non-compliance during self-monitoring can declare it to Ethical Toy Program prior to their field audit on a voluntary basis. Ethical Toy Program will then consider whether to exempt the declared non-compliance based on its severity. This may include, but is not limited to, errors that may occur occasionally such as extra working hours due to a sudden change in a customer’s shipping schedule or a power shortage.

Forms
Factories can download a Self-Declaration Form and view a sample on our website www.ethicaltoyprogram.org.

Procedure

Step 1
Factories should send a soft copy of the completed self-declaration form (click to download on our website), along with any supporting documents, to info@ethicaltoyprogram.org prior to the field audit for Ethical Toy Program’s internal records. For efficiency, please ensure the violations are clearly described in details on the form before submission. Please also submit any necessary photos and other supporting documents. Any self-declaration form received during or after audits will not be accepted.

Step 2
Factories are required to present a hard copy of the self-declaration form, with full details, to the auditor(s) at the start of the field audit. The auditor(s) will reflect the violation(s) in the on-site Corrective Action Plan (CAP).

Step 3
Ethical Toy Program will evaluate the field audit report submitted by the auditor(s) and the Self-Declaration Form submitted by the factory to assess the audit result based on the degree of transparency and severity of the reported violation(s). Ethical Toy Program will then use its sole discretion to decide whether the declared violation(s) will be exempted.

We hope that, with this procedure, factory managers will learn to effectively monitor the factory’s issues and violations, and take a more proactive approach to enhancing social compliance in their operations.

Should you have any questions, please contact our Factory Helpdesk for more details via email at info@ethicaltoyprogram.org or call (852)2111-2462.

**Frequency Asked Questions**

1. **What is the self-declaration procedure?**

   The self-declaration procedure is the next step in the Ethical Toy Program Continuous Improvement Process aimed at increasing social compliance and capability building. This new process encourages factories to proactively recognize and report their own violations which may receive exemptions depending on the factory’s follow-up actions and the severity. Violations should be described in full details on the self-declaration form, along with photos and supporting documents if necessary.

2. **Why did Ethical Toy Program launch this new procedure?**

   The self-declaration procedure provides factories with an established system for proactive self-monitoring that allows them to build capability in managing their social compliance status while providing increased transparency, both of which will help to advance the toy industry as a whole.

3. **How should I submit a self-declaration form and what are the follow up procedure?**

   The factory should submit a completed soft copy of the self-declaration form to info@ethicaltoyprogram.org prior to the field audit, and submit a hard copy to the auditor(s) during the field audit. The auditor(s) will reflect the violations in the on-site Corrective Action Plan (CAP). Ethical Toy Program will then evaluate
the self-declaration form and the field audit report according to the degree of transparency and seriousness.

4 When should a factory submit the self-declaration form?

A factory should submit a completed self-declaration form as soon as it realizes it has committed an error, or when the non-compliance is inevitable. The soft copy must be sent to Ethical Toy Program via info@ethicaltoyprogram.org before the next scheduled field audit. Any self-declaration form received during or after the audit will be deemed as invalid.

5 Will Ethical Toy Program automatically exempt factory’s self-reported violations?

No. Ethical Toy Program will first review the field audit report, and then determine whether the reported non-compliances are exemptible according to factory’s transparency and the severity. The factory’s overall performance will also be considered as part of the review process. Ethical Toy Program reserves the right of exemption at our sole discretion.

6 Will audit firms receive a copy of the completed self-declaration form prior to the field audit?

Audit firms will not receive any copy of the completed forms before the field audit to avoid any biased view during the audit. However, the factory should provide the auditors with a hard copy of the submitted self-declaration form and any supporting documents at the start of the field audit. The auditor(s) will then record the information in the on-site Corrective Action Plan (CAP).

7 If a factory submitted the form voluntarily, would it require an extra audit?

The factory will continue its normal audit cycle, as usual.