



Responsible  
Jewellery  
Council

# Assurance System Report



**Version 1: 15 August 2014**

**Submitted to ISEAL Alliance for compliance  
with the Assurance Code**

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## Foreword

RJC's Certification programs commenced operation in 2009, and in 2013 RJC completed a major review of its core standard, the Code of Practices along with the accompanying assessment framework. This public Assurance Systems Report aims to provide an overview into the current design and operation of RJC's assurance process, as well as further plans for increasing effectiveness and enhancing good practice.

RJC's work in this area is governed by the *ISEAL Code of Good Practice for Assuring Compliance with Social and Environment Standards* ("Assurance Code"). This report is part of RJC's compliance requirements as a full ISEAL Alliance Member, and provides technical detail on RJC's approach to interested stakeholders. Questions and feedback are welcome.

This report will be submitted to the ISEAL Alliance in August 2014 and will be updated annually and as required. The report is published on the RJC website at:

<http://www.responsiblejewellery.com/assurance-framework>

*Note: The relevant provision of the ISEAL Assurance Code is noted in brackets at the end of each sub-heading in this report.*

## 1. Assurance System Structure

### 1.1 List of Standards being assessed under the assurance system (5.2.1 baseline)

The Responsible Jewellery Council (RJC) operates two standards for certification:

1. Code of Practices ("COP")

- Status: First version 2009, first revision 2013
- Next formal revision due: At 5 years (2018) or as required
- Documentation: <http://www.responsiblejewellery.com/rjc-certification/code-of-practices-certification13/>

2. Chain-of-Custody Standard ("CoC")

- Status: First version 2012
- Next formal revision due: At 5 years (2017) or as required
- Documentation: <http://www.responsiblejewellery.com/chain-of-custody-certification/>

The Code of Practices is compulsory for companies that join the RJC ("RJC Members") who must achieve certification within two years of joining. At August 2014, 343 of the RJC's 510 Members have achieved COP Certification.

The Chain-of-Custody (CoC) Standard deal with the flow of defined precious metals through the jewellery supply chain, and its uptake is voluntary for RJC Members. It can be sought either by entire Member companies or by individual entities or facilities under their control. Currently there are 11 CoC Certified entities.

Comprehensive documentation for both of these standards is available on the RJC website, including the normative standard, accompanying standards guidance, an assessment manual covering both standards, and assessment workbooks and toolkits to support consistency of implementation by both RJC Members and assurance providers ("Auditors").

### 1.2 Description of the overall structure of the assurance programme (6.1.1 baseline)

The [RJC Assessment Manual](#) is the key document that sets out the overall structure of the assurance programme in a transparent manner for all stakeholders. The Manual provides guidance on the assessment procedures supporting RJC Certification, as well as instruction and guidance on:

- The process for achieving RJC Certification
- How a Member performs a Self Assessment
- How Auditors conduct independent third party audits
- The principles for conducting effective assessments so as to drive continual improvement.

It is a requirement that the Assessment Manual be used by all RJC Members and RJC Accredited Auditors when carrying out activities and responsibilities associated with RJC Certification.

#### *Roles and responsibilities*

Section 2 sets out the key roles and responsibilities in the Certification process for the RJC, Members and Accredited Auditors. In summary:

- The RJC is responsible for the design of the RJC standards and the governance and operation of the RJC certification processes. In other words, RJC is responsible for the design of the assurance framework and its consistent implementation, primarily through its professional staff and independent specialists. RJC governing bodies would only become involved in the assurance process if sanctions were required as an outcome of a complaints process.
- Members are responsible for operating their business in conformance with the Code of Practices (mandatory) and the Chain-of-Custody standard (voluntary). This is tested through the RJC assurance framework. Guidance, assessment tools and training are provided to all Members by RJC to support accessibility, learning and continuous improvement within the assurance process.
- Accredited Auditors are the assurance providers. They are responsible for verifying whether a Member's systems are in conformance with the RJC Standard/s being assessed and providing a statement of conformance as part of an audit report to the RJC. They are also responsible for recognising when audit objectives are unattainable and reporting the reasons to the Member and the RJC.

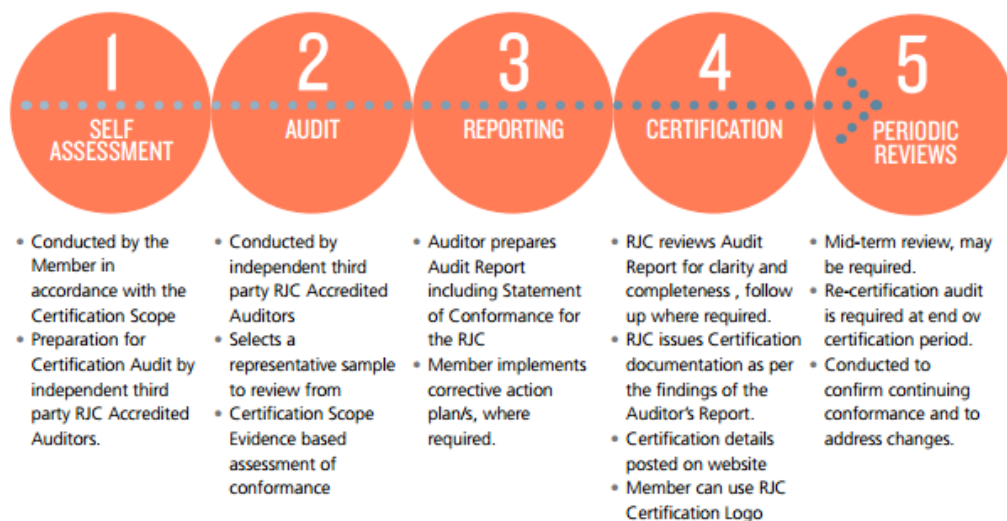
For a full description of these roles and responsibilities, see pages 10-11 of the RJC Assessment Manual.

### Overview of the Certification Process

The steps in the Certification Process are also laid out in section 3.3 of the Assessment Manual (p16).

### 3.3 Overview of the Certification Process

There are five main steps in the RJC Certification process, summarised in Figure 1 - Steps in the RJC Certification Process.



### Type and Frequency of Assessment Process

Types of RJC audits include Certification Audits, Surveillance/Mid-Term Review audits, and Re-Certification Audits. Sections 3.3 and 3.4 in the Assessment Manual set out the types and frequency of these.



TABLE 3: AUDIT TYPES BY RJC STANDARD

| RJC Standard      | Audit Type             | Frequency                                     | Requirement  |
|-------------------|------------------------|---|--|
| Code of Practices | Certification Audit    | Within 2 years of becoming a Member           | Mandatory for Membership   |
|                   | Mid-Term Review        | 12 – 24 months after Certification is granted | Need for Mid-Term Review determined by RJC auditor at Certification Audit (See criteria in Table 13) |
|                   | Re-certification Audit | At end of Certification Period                | Mandatory for continuing Membership  |
| Chain of Custody  | Certification Audit    | No timeframe specified                        | Voluntary uptake by a Member   |
|                   | Surveillance Audit     | 12 – 24 months after Certification is granted | A Surveillance Audit is required during the Certification Period.                                    |
|                   | Re-certification Audit | At end of Certification Period                | If a Member has chosen to continue with Certification, a Re-certification Audit is required.         |

TABLE 4: CERTIFICATION PERIOD BY AUDIT FINDINGS, AUDIT TYPE AND RJC STANDARD

| RJC Standard               | Audit Type            | Minor Non-Conformances only | Any Major Non-Conformances | Any Critical Breaches      |
|----------------------------|-----------------------|-----------------------------|----------------------------|----------------------------|
| RJC Code of Practice (COP) | Initial Certification | 3 years                     | 1 year                     | No Certification           |
|                            | Mid-Term Review       | Continue the 3 year term    |                            | Certification is suspended |
|                            | Re-Certification      | 3 years                     | A further 1 year           | No Certification           |
| Chain of Custody (CoC)     | Initial Certification | 3 years                     | No Certification           |                            |
|                            | Surveillance Audit    | Continue the 3 year term    | Certification is suspended |                            |
|                            | Re-Certification      | A further 3 years           | No Certification           |                            |

RJC audits are management systems audits (not *product* certification) and the specific assessment framework, including conformance ratings and types of evidence, is laid out comprehensively in the RJC Assessment Workbook <http://www.responsiblejewellery.com/code-of-practices-2013-english/>. The Workbook is currently also available in French and Italian, and is being translated into four other languages for release in the coming months.

#### *Group assessments – not applicable*

RJC does not conduct assurance of groups of enterprises. While RJC Members may comprise multi-site operations, these must all be under the ownership and management control of the RJC Member entity.

### 1.3 Status of compliance with ISO 17021 (5.1.2 baseline)

RJC has developed its assurance framework and associated management system on the basis of ISO 17021:2011 *Conformity assessment – Requirements for bodies providing audit and certification of*

*management systems*. RJC uses the ISO 17021 framework because its assurance process is focused on management systems, rather than the ISO 17065 framework which encompasses certification of *products* and related processes and services.

RJC assurance providers are required to operate in conformance with ISO 17021. Conformance is established during the 'RJC Accredited Auditor' application process, where assurance providers must either demonstrate current accreditation against ISO 17021, or submit sufficient evidence of conformance for review by RJC as part of the application process.

This must be demonstrated by either:

- Current ISO 17021:2011 Accreditation by a third party firm that is a member of the International Accreditation Forum for ISO 17021:2011 management system certification schemes.
- Documented evidence that demonstrates conformance with the requirements of ISO17021:2011, submitted to RJC, and reviewed by RJC's choice of an independent consultant with appropriate experience to verify the Application.

Reviews are carried out by an independent accreditation specialist, Sam Brumale, who has extensive experience in management systems auditing, training and accreditation processes. The results of the reviews are documented with successfully accredited assurance providers being published on the RJC website. RJC reserves the right to suspend or revoke accreditation where Auditors do not carry out their duties appropriately or otherwise impair the quality and credibility of RJC Certification.

RJC requirements for assurance providers are published on its website at:

<http://www.responsiblejewellery.com/auditors/become-an-auditor/>

#### **1.4 Frequency and focus of the assurance system review, including how results inform improvements in the assurance system (5.2.4 improvement)**

In 2013, both the RJC Assessment Manual and Assessment Workbook underwent a major revision and were re-published, along with the rest of the Code of Practices documents (standard, standards guidance, certification handbook).

The RJC assurance system was reviewed alongside the major [Code of Practices review](#) in 2013, because the standard and the assurance process are integrally interlinked in implementation and thus often form part of the stakeholder feedback in a review standards-setting process. For example, some stakeholders commented on the need for a surveillance type audit within the certification period for the Code of Practices, according to risk-based criteria.

Key changes made in the Assessment Manual during the 2013 review included:

- Integrating instruction on the assessment process for both RJC standards in the one Assessment Manual (Code of Practices, Chain-of-Custody)
- Introducing Mid-Term Reviews for the Code of Practices, with risk-based criteria for when these would be triggered
- Adding a new section on harmonisation and recognition of existing certifications in parallel schemes
- Introducing criteria for the inclusion of mining exploration activities in the audit scope for a Code of Practices certification audit
- Expanding the guidance on determining certification scope for enterprises with multiple controlled entities

- Updating the audit reporting requirements to include new M&E indicator data
- Providing additional guidance on sampling techniques
- A general 'plain English' update to simplify technical language and improve the structure of the Manual, to enhance general understanding and also simplify translations into other languages.

An overview of changes is available on the RJC website: <http://www.responsiblejewellery.com/files/RJC-Assessment-Manual-Training-Module-Jan20141.pdf> (a recorded video is also available from the Training page).

The RJC Assessment Workbook (the audit protocol) was also completely revised based on the new structure of the Code of Practices, and a new export function added to simplify reporting of M&E data and RJC record keeping. An online training module provides guidance on how to use the Workbook, and notes new features:

<http://www.responsiblejewellery.com/files/RJC-Assessment-Workbook-Training-Module-Jan2014.pdf> (a recorded video is also available from the Training page).

Major changes to the assurance system are proposed, discussed, documented and publicly communicated in Standards Committee minutes and consultation material, and once implemented, in RJC training modules.

RJC and its stakeholders value this integrated approach to reviewing assurance and standards together, and it is envisaged this approach will continue. The next major review of the assurance system will thus coincide with the next major standards review as documented in the relevant standards (COP – 2018 and CoC - 2017).

RJC's most recent risk assessment was in 2013. The next risk management review is scheduled for 2015 and an assessment of current and evolving risks in the assurance system will continue to form part of this.

### **1.5 List of assurance providers that are approved to work in the assurance system (6.1.1 baseline)**

RJC assurance providers are termed "Accredited Auditors" and a list, along with the scope of accreditation (standards, sectors and geographies) and relevant contact details, is maintained on the RJC website at: <http://www.responsiblejewellery.com/auditors/accredited-auditors/>

At August 2014, there are 12 Accredited Auditors (assurance providers) listed. Of these, 6 operate globally and 6 operate in identified countries in Europe, North America or Asia. RJC aims to continue to develop a wide pool of auditors with relevant experience across a breadth of operating regions where Members operate.

### **1.6 Risk management plan (5.2.2 improvement)**

RJC has carried out organisational risk assessments in 2008, 2011 and 2013 as part of its Monitoring and Evaluation (M&E) program and these include risks associated with the assurance system.

The 2013 risk assessment and associated management plan was undertaken in the context of the major revision of the RJC Code of Practices, and notes risks and issues identified in the 2012 Auditor Consistency Review which were actioned as part of the COP and associated Assessment Manual revision.

The risk assessment/management plan will be updated in early 2015 to take account of improvements in systems and to review additional issues that have been identified through the internal compliance reviews for both the Impacts and Assurance Codes.



RJC's independent accreditation specialist (Sam Brumale) is commissioned to undertake an Audit and Certification Consistency Review for each calendar year. The 2013 period has not yet been completed due to focus in the first half of 2014 on first importing all available data into the WORK[etc] platform for M&E purposes. Once all relevant data cleaning and import is complete, anticipated shortly, the WORK[etc] database will considerably simplify the annual Consistency Review process. The review of 2013 data should then be completed in the coming months.

### **1.7 Criteria for accepting assurance providers to the scheme (5.2.1 baseline)**

RJC sets out criteria for both assurance providers ("Accredited Auditors") and competency criteria for individual auditors within those firms. These are fully documented in the *RJC Accreditation Process and Criteria (T004\_2013)* document and associated *Application Form* on the RJC website at:

<http://www.responsiblejewellery.com/auditors/become-an-auditor/>

Accreditation reflects RJC review and endorsement of an assurance provider's competence, credibility, independence and integrity in carrying out its audits on RJC Members. The RJC Accreditation process is aligned with relevant requirements outlined in ISO 17021 and ISO17011.

In summary, assurance providers need to be able to demonstrate that they conform to *ISO17021:2011 Conformity assessment – Requirements for bodies* providing audit and certification of management systems. This can be demonstrated by either:

- Current ISO17021:2011 Accreditation by a third party firm that is a member of the International Accreditation Forum for ISO17021:2011 management system certification schemes.
- Documented evidence that demonstrates conformance with the requirements of ISO17021:2011, submitted to RJC, and reviewed by RJC's choice of an independent consultant with appropriate experience to verify the Application.

For individual auditors, there are additional criteria for personnel competence which are covered in Section 3 of this report.

### **1.8 Criteria for accepting clients to the scheme (5.2.1 baseline)**

Scheme clients are "RJC Members", specifically "Commercial Members" (which excludes industry Trade Association members). RJC Commercial Membership is open to all companies that:

- Are actively involved for commercial reasons in the diamond, gold and/or platinum group metals jewellery supply chain – this includes jewellery watches for their diamond, gold and/or platinum components; and
- Are exempt from the role of consultant, advisor, third party auditor or any other similar entity; and
- Commit to the prevailing Code of Practices on business ethics, social performance, human rights and environmental performance adopted by the Responsible Jewellery Council; and
- Pay an annual commercial membership fee; and
- Submit a complete and accurate application form.

RJC Members are required to achieve Certification against the Code of Practices within two years of joining RJC. More information and the application form is available at:

<http://www.responsiblejewellery.com/applications/rjc-member/>

At August 2014, RJC had more than 500 Members across the supply chain active in mining, precious metals refining and trading, diamond trading cutting and polishing, jewellery manufacturing, jewellery wholesaling, jewellery retailing, and service industries (such as diamond grading, metals assaying, and secure transport).

### **1.9 Procedure for mitigating conflicts of interest (5.2.3 improvement)**

Section 8.7 and Appendix 8 on audit report content in the RJC Assessment Manual require that auditors must acknowledge that the audit team and topic experts were independent and free from conflict, with any unresolved conflict issues to be identified in audit reports. Assurance providers are not permitted to assess their own work, such as that arising from involvement in audit preparation or establishment of systems for a Member for which they will carry out RJC assurance activities.

RJC's Accreditation Process and Criteria document sets out the five basic principles of auditor conduct, as identified by ISO 19011:2011, which includes that conflicts of interest must be identified and avoided. The five principles (also noted in the RJC Assessment Manual, section 8.7.2) are:

#### **1. Ethical Conduct:** the foundation of professionalism.

- Trust, integrity, confidentiality and discretion are essential to all audits. This includes the prohibition of bribery, gifts and/or facilitation payments.

#### **2. Fair presentation:** the obligation to report truthfully and accurately.

- Findings, conclusions and reports reflect truthfully and accurately the Member's practices.

#### **3. Due professional care:** the application of diligence and judgement in assessments.

- Auditors exercise competence and care in accordance with the importance of the task they perform and the confidence placed in them by the Member and the RJC.

#### **4. Independence:** the basis for the impartiality of the Assessment and objectivity of the Assessment conclusions.

- Auditors are independent of the activity being assessed and are free from bias and conflict of interest.

#### **5. Evidence based approach:** the rational method for reaching reliable and reproducible conclusion in a systemic Assessment process.

- Auditors maintain an objective state of mind throughout the Assessment process to ensure that the findings and conclusions will be based only on the Objective Evidence.

The RJC Accreditation Process and Criteria document then sets out that misconduct of Auditors (assurance providers) against the above principles or any other of RJC's requirements for Auditors will result in a 6 month suspension period, during which time the Auditor's details will be removed from the RJC website. The Auditor will be asked to demonstrate to the RJC, via corrective action or other action requested by RJC, that the issues which led to the suspension have been resolved.

If RJC is satisfied with the Auditor's response, the suspension can be lifted and the Auditor's details re-added to the RJC website. The Auditor's Accreditation will be revoked if the matters which led to the suspension have not been resolved at the conclusion of the 6 month suspension period.

## 2. Stakeholder Engagement

### 2.1 Points at which stakeholders can engage in the assurance process (6.1.4 improvement)

Stakeholders can be involved in the assurance process both via (a) the complaints system and associated or alternative dispute resolution and (b) interviewees in assessments.

Stakeholders are encouraged to contact the RJC with any concerns about the assurance process, and the RJC Complaints Mechanisms makes provision for complaints from any interested party. A change implemented in the 2013 Code of Practices review was to include information about the RJC Complaints Mechanism in every new certificate for Certified Members:

#### *RJC Complaints Mechanism*

The RJC aims to ensure the fair, timely and objective resolution of complaints relating to potential non-conformance with RJC Certification or RJC's own policies and procedures. Where complaints arise, it is a condition of participation in RJC activities for RJC Members and Accredited Auditors to submit to the RJC Complaints Mechanism and to be bound by the decisions of the RJC. However this does not replace or limit access to judicial remedies.

Full documentation supporting the RJC Complaints Mechanism can be downloaded from:

<http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>

Example taken from: <http://www.responsiblejewellery.com/files/RJC-COP-2013-Certificate-Goldkid-Trading-CC.pdf>.

Stakeholders are also sources of information for evaluating conformance where relevant, through interviews by assurance providers. Relevant provisions are noted in the RJC Assessment Workbook where this appears under 'Types of Evidence' (see example below). Appendix 4 in the RJC Assessment Manual includes guidelines for conducting effective audits, including communication and interpretive skills, effective questioning and effective listening. These are covered in auditor training.

| Name of Member, Facility (or other reference):  |      |   |     |   |  |                           |   |                                    |            |
|---|------|---|-----|---|--|---------------------------|---|------------------------------------|------------|
| Status 0 Provisions assessed from a total of 108 relevant to the COP Certification Scope. |      |   |     |   |  |                           |   |                                    |            |
| Code of Practice Provisions   | #    | Provision   | #   | Assessment Questions  | Types of evidence  | Observations and findings | List Objective Evidence (Documentation, Observations and/or Testimonials) | Performance rating (Please select) | Document I |
| 30. Community Engagement  | 30.1 | Members in the Mining Sector shall have systems in place for early and ongoing engagement with affected communities and other relevant stakeholders that:<br>a. Apply appropriate skills and resources;<br>b. Apply throughout the project's lifecycle, from exploration activities, construction prior to commencement of mining, during mine operations, through to closure and post-closure monitoring;<br>c. Identify affected communities and other relevant stakeholders in relation to project Risks, impacts, and phase of development;<br>d. Establish effective communication measures to disseminate relevant project information and receive feedback in an inclusive, equitable, culturally appropriate and rights-compatible manner;<br>e. Through informed consultation, consider the interests and development aspirations of affected communities in major mining decisions in the project's lifecycle, and seeks broad community support for proposals. | 162 | Check that the Member has systems in place for early and ongoing engagement with affected communities and other relevant stakeholders.  | - Policy statements<br>- Procedure for early and ongoing engagement with affected communities and other relevant stakeholders<br>- List of Employees and experience involved in stakeholder engagement<br>- Records of ongoing engagements throughout the project's lifecycle<br>- Records identifying affected communities and other relevant stakeholders in relation to Risks, impacts and phase of development - Records of communication and feedback with affected communities and other relevant stakeholders<br>- Records demonstrating consideration of the interests and development aspirations of affected communities |                           |   |                                    |            |
|   |      |   | 163 | Demonstrate that these systems apply appropriate skills and resources.  | - Interviews with affected communities and other relevant stakeholders.  |                           |   |                                    |            |
|   |      |   | 164 | Demonstrate that these systems apply throughout the project's lifecycle, from exploration activities, construction prior to commencement of mining, during mine operations, through to closure and post-closure monitoring. |  |                           |   |                                    |            |
|   |      |   | 165 | Demonstrate that these systems identify affected communities and other relevant stakeholders in relation to project Risks, impacts, and phase of development.   |  |                           |   |                                    |            |

Example of assessment question and highlighted types of evidence from RJC Assessment Workbook that includes interviews with affected stakeholders

RJC also has a multi-stakeholder [Standards Committee](#) which engages in the review process of assurance policies and procedures as laid out in the RJC Assessment Manual. The Assessment Manual was most recently reviewed in 2013 as part of the Code of Practices Review, and stakeholder input was sought on changes to the framework of audit frequency (such as mid-term reviews and surveillance audits) and sampling of exploration sites of Members involved in mining activities.

## 2.2 Description and link to complaints procedure for complaints against the standards system or for reporting instances of potential fraud (6.7.3 improvement)

RJC has a documented complaints procedure that is both accessible to any interested party and sets out processes for investigation, sanctions and appeals. The RJC Complaints Mechanism was developed in collaboration with an expert in rights-compatible grievance mechanisms at the Centre for Social Responsibility in Mining, University of Queensland ([Dr Deanna Kemp](#)). The first edition was released in 2010 and then updated in 2012 following the launch of the RJC Chain-of-Custody standard to incorporate those aspects.

<http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>

Prior to submitting a complaint via the RJC procedure, complainants are encouraged to make all reasonable attempts to resolve their complaint at the lowest, most appropriate level. Wherever possible, this includes raising the complaint directly with the person/organisation subject to the complaint and giving the respondent an opportunity to respond and/or rectify the situation.



A dedicated email address ([complaints@responsiblejewellery.com](mailto:complaints@responsiblejewellery.com)) is monitored by several staff. To date, no formal complaints within scope have been taken through the process, but a number of complaints about product quality (not related to RJC certification) from consumers have been forwarded on to relevant Members for their action. In July 2014, record-keeping was migrated to the WORK[etc] system via the 'Support Cases' function, which will enable enhanced monitoring of types of complaints, timeframes of the process, and outcomes.

### 3. Personnel Competence

#### 3.1 Overview of the qualifications and competency requirements for auditors and other assurance personnel (6.3.1 improvement)

As noted earlier in section 1.x of this report, the RJC Auditor Accreditation criteria set out requirements for qualifications and competency of the audit personnel of accredited assurance providers which are aligned with ISO 17021 and ISO 17011.

RJC places some responsibility on assurance providers for the competence of their personnel. In particular, the assurance provider's auditor assessment processes must conform with *ISO/IEC 17024 Conformity assessment -- General requirements for bodies operating certification of persons*. All Auditors approved by the assurance provider for RJC assessments must also conform with the criteria specified by RJC in Table 1 below, developed from ISO 19011: 2011.

**TABLE 1: AUDITOR SELECTION CRITERIA**

| Auditor Role  | Minimum Selection criteria  |
|---------------|---|
| All Auditors  | <p>Secondary education; and</p> <p>5 years total work experience; and</p> <p>At least 2 years of the total five years work experience in business ethics, social and/or environmental management field; and</p> <p>Recognised formal auditor training.</p> <p>At least, four complete audits for a minimum total of 20 days of audit experience as an Auditor-in-training, under the direction and guidance of an Auditor competent as an audit team leader.</p> <p>The audits should be completed within the last 3 consecutive years.</p> <p>Current registration with IRCA1 or be able to demonstrate conformance with IRCA requirements or carry an equivalent recognised registration.</p> <p>Auditors must be impartial and not provided any consulting service relating to the RJC Certification to Members in the previous 3 years.</p> |
| Lead Auditors | <p>At least three complete audits for a minimum total of 15 days of audit experience acting in the role of an audit team leader.</p> <p>The audits should be completed within the last 2 consecutive years.</p>   |

**Note:**

- Recognised auditor training must be competency based and delivered by a registered and qualified training organisation for auditor training.
- Secondary education is that part of the national educational system that comes after primary or elementary stage, but that is completed prior to entrance to a university or similar educational institution;
- The number of years of work experience may be reduced by 1 year if the person has completed appropriate post-secondary education;
- 'Audit days' only applies to time on site. It excludes preparation (for example planning) and post audit follow-up activities (for example reporting).
- [Source ISO19011:2011]

Further, all Auditors will be required to undergo training which covers the RJC Standards within the Accreditation Scope.

As part of the review of an assurance provider applying for RJC Accreditation, RJC's independent accreditation specialist (Sam Brumale) reviews the CVs of all auditors submitted with their application. This aims to confirm that the RJC's criteria are shown to be met, or whether further information is required to evidence this.

For more information on the qualifications and competency requirements for auditor personnel, see the accreditation documentation at:

<http://www.responsiblejewellery.com/auditors/become-an-auditor/>

Following a similar project for all Membership, Certification and M&E data, RJC is currently migrating all its auditor and training records from documents and spreadsheets to its cloud-based database system WORK[etc]. As for the other areas, this will identify opportunities for more integrated management of RJC's record-keeping of qualifications, experience, and changes in auditor personnel.

In 2014, RJC is also initiating a Topic Expert Accreditation program. Topic Experts are defined as individuals with specialist expertise in all or parts of RJC Standards that can play either a consulting role for Members, or fill specialist roles in audit teams. This program was developed mainly at the request of some assurance providers who were looking for specialists on technical issues such as artisanal mining, or mine tailings, and also language skills, to assist with assessing relevant requirements in the Code of Practices.

Unlike for RJC assurance providers, applications for Topic Experts are currently by invitation only, so as to implement a controlled roll-out of the program. A 'Process and Criteria' document for Topics Expert was developed and selected potential experts invited to apply with information supporting their defined expertise. At August 2014, applications have been reviewed and training has been scheduled. Once complete, RJC will publish the contact details and areas of expertise of these Topic Experts on the RJC website.

### **3.2 Description of training and professional development available to assurance personnel, including calibration, where this is implemented (6.3.2 and 6.3.3 improvement)**

As noted in section 3.1 above, RJC requires audit personnel to have undertaken recognised formal auditor training, and at least four complete audits for a minimum of 20 days of audit experience as an auditor-in-training, under the direction and guidance of a competent audit team leader. RJC's requirements are based on ISO19011:2011 *Guidelines for quality and/or environmental management systems auditing*.

RJC also provides tailored training on the RJC standards and assurance process to Accredited Auditors. These sessions are mostly conducted by webinar, and are delivered by Sam Brumale, an experienced auditor, auditor trainer and independent accreditation specialist. In May 2014, RJC appointed a new RJC Training Coordinator to the RJC team, who will enhance the focus on both Member and Auditor Training (and Topic Experts), keeping training modules regularly updated and scheduling sessions for new personnel and on requested topics. An expanded training development and delivery plan is under development.

To date, RJC has implemented regular 'update' trainings via webinar for calibration purposes for existing auditors first in mid-2012 and then in early 2014 to introduce the new COP. Some short 'refresher' modules have also been made available on demand to all assurance providers via the RJC website. These provide auditors the opportunity for Q&A and knowledge exchange.

RJC has also convened a 'calibration' half-day auditor training session at a diamond cutting and polishing factory in Surat, Gujarat, for all assurance providers active in India. The session provides the opportunity for a detailed Q&A session and discussion of interpretation issues. It was carried out alongside a general half-day training series in Mumbai and Surat for both Members and Auditors on key changes to the COP 2013 relevant to Indian operations.

RJC has also been working on improving its internal systems of record-keeping and review to support ongoing identification of training and professional development needs. Follow-up from RJC with auditors about submitted audit reports are being tracked in the RJC WORK[etc] database. From July 2014, Auditor questions to RJC are being tracked in the RJC WORK[etc] platform in the 'Support Cases' function. Periodic reviews of this data will be used to trigger updates to training and new training modules. For example, Member and Auditor questions in the month of July pointed to the need for an updated training module on the new COP provision on 'Provenance Claims', which is being developed for August/September rollout.

### **3.3 Evaluation of assurance personnel (6.3.4 improvement)**

As noted earlier, RJC places responsibility on assurance providers for ensuring the ongoing competence and of their personnel through the requirement for them to have internal management systems in accordance with ISO 17021. Accreditation applications are required to include information on the assurance provider's procedures for competency evaluations, as ISO 17021 requires them to assess the competence of auditors on a regular basis. Where assurance providers have been accredited by a third party firm that is a member of the International Accreditation Forum (via a proxy accreditation model), this also involves oversight by that third party including via on-site assessments.

In addition, RJC carries out direct evaluation of assurance personnel competence during the accreditation process (and during re-accreditation after 4 years) through the review of individual CVs of all assurance personnel who will carry out RJC-related audits. Assurance providers wishing to add new assurance personnel must submit CVs for review and have them undergo the required RJC training. RJC also indirectly evaluates competency through its reviews of all submitted audit reports with individual follow-up as required.

RJC makes provision for conducting its own on-site assessments either directly or via an independent assessment team. A plan for on-site assessments is currently being developed, and priority areas include those assurance providers that RJC has assessed directly for their conformance with ISO 17021 and are not governed under a separate (proxy) accreditation, and assurance providers operating in India.

To further improve RJC's current systems for ongoing evaluation, three projects are planned for implementation into 2015 and beyond:

- Establishment of an auditor log-in portal in the RJC WORK[etc] to enable more individualised tracking of participation in RJC training, administration of evaluation assessments by the RJC Training Coordinator, and uploading information on ongoing training provided by other entities including the assurance provider.
- Establishment of a Member (client) survey mechanism in the WORK[etc] platform following each audit, to cover feedback on assurance personnel, value of RJC training, guidance and toolkits, any gaps or issues encountered, and data for relevant M&E indicators.
- Establishment of a program and procedure for periodic on-site witness audits. RJC makes provision for witness audits in its Accreditation Process and Criteria document, but has not yet conducted any. A plan and procedure is current under development.

### **3.4 How conflicts of interest are managed (5.2.3 improvement)**

The procedure for managing potential conflicts of interest is discussed earlier in section 1.9 of this report.



## 4. Assessment

### 4.1 Description of assessment process

The RJC assessment process is fully documented in the [RJC Assessment Manual](http://www.responsiblejewellery.com/code-of-practices-2013-english/) and RJC Assessment Workbook (<http://www.responsiblejewellery.com/code-of-practices-2013-english/>) published on the RJC website. Assurance providers are required to follow these procedures for all RJC standards and assessments. The following table summarises the key aspects and notes the relevant section in the Assessment Manual.

| Aspect of Assurance Process       | Summary of RJC approach  | RJC Assessment Manual Reference   |
|-----------------------------------|--|---|
| Types of audits                   | RJC standards are largely management systems based and require on-site assessment in the assurance process. These can be complemented by desk-based review of some aspects, for example pre-audit planning or post-audit follow up, where appropriate.   | Sections 8.1 and 8.2  |
| Frequency and intensity of audits | <p>Audits take place at a minimum every three years, with mid-term reviews 12-24 months after Certification required in some circumstances. Frequency of the different audit types is set out in Table 3 with criteria for mid-term reviews in Table 13. Guidance is provided on defining the audit scope for each audit (section 8.5) and the criteria for mid-term reviews (COP).</p> <p>For the mining sector in particular, Table 10 sets out criteria for inclusion of mining exploration to pre-commissioned activities in the audit scope for a Code of Practices assessment, as to whether the activity would trigger a site visit, a desktop review, or would generally be excluded from the scope.</p> <p>The intensity of audits is guided by the RJC Assessment Workbook, which lays out the audit protocol for assessments.</p> | Section 3.4 (Tables 3 and 4);<br>Section 8.16 (Table 13);<br>Sections 8.5 (Table 10). |
| Sampling protocol for audits      | The Assessment Manual includes a chapter on 'Objective Evidence and Sampling', which includes general advice that sample sizes need to be sufficient to provide a reasonable level of confidence that it is representative of the larger group. Appendix 5 provides more detail on sampling techniques, sampling methods, and determining sample sizes. The latter includes Table 16 on minimum sample size based on population size, and Table 17 as an alternative statistical basis for deciding sample size based on   | Section 6 and Appendix 5.   |

|                                  |  |   |
|----------------------------------|--|---|
|                                  | confidence. Both tables are drawn from Military Standard 105D which is commonly used in the quality control industry.  |   |
| Structure of audit teams         | RJC audits are to be carried out under the control of an experienced Lead Auditor, with additional assurance personnel comprising the audit team as required. The size and composition of the audit team will be influenced by factors including audit scope, geographic location, requirement for specialist knowledge and language and cultural considerations. The respective responsibilities of Lead Auditors and audit team members are documented. The use of Topic Experts is also noted.  | Section 8.7   |
| How audit time is calculated     | Guidance is provided on estimating audit time, based on factors such as the size, complexity and location of a Member's operations. Figure 6 sets out a matrix for organisation types and complexity factors which affect auditing times. Table 11 then provides guidance regarding the time on site (Audit person Days) during a certification audit, varying according to these factors. Table 12 provides guidance for time on site (Audit person Days) for subsequent audits – period reviews and re-certification audits. Both tables are based on estimates for management system certification schemes, published by the International Accreditation Forum. | Section 8.6, particularly Figure 6, Tables 11 and 12. |
| Minimum content of audit reports | Guidance on reporting is included in section 8.21, with reports needing to give a detailed account of the audit process. While audit reports submitted to RJC must be in English, RJC provides for an audit report in any language to also be submitted to the Member who has been assessed. RJC sets out both a required Statement of Conformance template from assurance providers, and the minimum mandatory content for audit reports.   | Section 8.21, Appendix 7 and Appendix 8.              |

#### 4.2 Whether and how knowledge sharing is allowed within the audit process (6.2.1 improvement)

Assurance providers are prohibited from being involved in the development of a Member's systems that they will audit as this represents a conflict of interest. However RJC does allow for assurance providers to make recommendations about how to correct non-conformances, or offer 'Suggested Business Improvements', and these are to be documented in the Audit Reports.

Section 8.15 of the Assessment Manual notes that auditors, based on their experience, may offer recommendations about correcting non-conformances or improving practices which conform with RJC standards but which could be conducted differently or more efficiently. Recommendations and such 'Suggested Business Improvements' are purely for informative purposes only and must be offered without prejudice. Members are under no obligation to accept or implement them and subsequent audits shall not judge performance based on these particular recommendations.

Section 8.18 specifically sets out the role of assurance providers in reviewing and approving Corrective Action Plans for Major Non-Conformances in the Code of Practices. The Lead Auditor must verify that the proposed actions address root cause and prevent a recurrence of the finding, and is realistic and timely. Such a process accommodates feedback to a Member (client) to ensure that this can be achieved.

#### **4.3 Decision-making mechanism and how levels of non-conformity are determined (6.4.9 baseline)**

The RJC Assessment Manual and Assessment Workbooks fully document the RJC decision-making mechanisms, providing specific direction on how to determine levels of conformity.

Section 5 of the Assessment Manual specifies how to rate conformance and includes definitions for Major and Minor non-conformances and Conformance:

TABLE 5: CONFORMANCE RATINGS

| Conformance Rating    | Code of Practices  | Chain of Custody Standard   |
|-----------------------|--|---|
| Conformance           | The Member's business practices, including the policies, systems, procedures and processes, perform in a manner that conforms to the Provision in the RJC Code of Practices.   | The Member's policies, systems, procedures and processes perform in a manner that is conformant with the provision.   |
| Minor Non-Conformance | <p>The Member's business practices including the policies, systems, procedures and processes perform in a manner that is not wholly conformant with the Code of Practices. Minor Non-Conformances are defined as the occurrence of one or more of the following situations:</p> <ul style="list-style-type: none"> <li>• An isolated lapse of either performance, discipline or control of the Member's business practices, which does not lead to a Major Non-Conformance of the RJC Code of Practices</li> <li>• A situation where the Member has a known non-compliance of legislative or regulatory requirements relevant to the Code of Practices and there is adequate attempt to rectify the non-complying condition and the non-compliance does not result in an imminent significant Risk to Workers, the Community or the Environment</li> <li>• A situation where the Member has not identified legislative or regulatory requirements relevant to the Code of Practices and the non-compliance does not result in an imminent significant Risk to Workers, the Community or the Environment</li> <li>• A finding which may not be an actual breach of the RJC Code of Practices at this point in time, but is judged to be a potential inadequacy in the Member's business practices during the Certification Period.</li> </ul> | The Member's policies, systems, procedures and processes perform in a manner that is not wholly in conformance with the provision, due to an isolated lapse of either performance, discipline and control which does not lead to a Major Non-Conformance. |

| Conformance Rating    | Code of Practices   | Chain of Custody Standard   |
|-----------------------|---|---|
| Major-Non Conformance | <p>The Member's business practices including the policies, systems, procedures and processes perform in a manner that is not conformant with the Code of Practices. Major Non-Conformances are defined as the occurrence of one or more of the following situations:</p> <ul style="list-style-type: none"> <li>• The total absence of implementation of a required provision</li> <li>• A Member-wide systemic failure or total lack of controls required to manage business risks related to the RJC Code of Practices</li> <li>• A situation where the Member has not identified legislative or regulatory requirements relevant to the Code of Practices, or there is a known non-compliance of such legislative or regulatory requirements and: <ul style="list-style-type: none"> <li>• there is inadequate attempt to rectify the non-complying condition and/or</li> <li>• this situation has the potential to result in an imminent significant Risk to Workers, the Community or the Environment;</li> </ul> </li> <li>• A group of related, repetitive or persistent Minor Non-Conformances indicating inadequate implementation</li> <li>• Any finding or observation supported with Objective Evidence to prove a Critical Breach, or which raises serious doubts as to whether the Member has the business practices to avoid any Critical Breach.</li> </ul> | <p>The Member's policies, systems, procedures and processes perform in a manner that is not conformant with the provision due to:</p> <ul style="list-style-type: none"> <li>• The total absence of implementation of the provision or</li> <li>• A systemic failure or total lack of required controls or</li> <li>• A group of related, repetitive and persistent Minor Non-Conformances indicating inadequate implementation.</li> </ul> |
| Not Applicable        | The Provision cannot be implemented by a Member due to the nature of its business covered by the Certification Scope.   | The Provision cannot be implemented by a Member due to the nature of its business covered by the Certification Scope.   |

While the RJC Code of Practices does allow a 1 year Certification period where major non-conformances have been identified, this is not permitted if the Major Non-Conformances are in 'Critical Breach' areas. A Critical Breach is defined as a Major Non-Conformance against a provision deemed to be critical to the integrity of the RJC COP, as identified in Table 6:

**TABLE 6: LIST OF CRITICAL PROVISIONS IN THE RJC CODE OF PRACTICES**

| Code of Practice Provision   | Provision Reference |
|--|---------------------|
| 16 Discipline and Grievance Procedures   | 16.1                |
| 17 Child Labour  | 17.1, 17.2          |
| 18 Forced Labour   | 18.1                |
| 23 Hazardous Substances  | 23.2                |
| 24 Waste and Emissions   | 24.2c               |
| 26 Product Disclosure  | 26.1                |
| 27 Kimberley Process Certification Scheme and World Diamond Council System of Warranties | 27.1                |



Types of evidence that auditors can seek to support determinations of conformance are outlined in the Assessment Workbook, an Excel spreadsheet. The spreadsheet includes macros to enable review of progress in the assessment, areas for recording objective evidence reviewing during the assessment and pull-down menus for recording conformance ratings.

| #   | Provision   | # | Assessment Questions   | Types of evidence  | Observations and findings | List Objective Evidence (Documentation, Observations and/or Testimonials) | Performance rating (Please select) | Document Non-conformances F Provision |
|-----|---|---|--|--|---------------------------|---|------------------------------------|---------------------------------------|
| 1.1 | Members shall have systems in place that maintain awareness of and ensure compliance with Applicable Law.   | 1 | Check that the Member has systems in place that maintain awareness of and ensure compliance with Applicable Law.   | <ul style="list-style-type: none"> <li>- Register of Applicable Law including relevant statutes and regulations</li> <li>- Subscription to Legal Advice/information</li> <li>- Available Legal Counsel</li> <li>- Procedure for periodic evaluation of compliance with Applicable Law</li> <li>- Legal compliance audits</li> <li>- Procedure to monitor and communicate changes to Applicable Law and implications of the changes.</li> </ul> |                           |   |                                    |                                       |
| 2.1 | Members shall adopt a policy/ies that documents the Member's commitment to responsible business practices, is endorsed by senior management, communicated to Employees and made publicly available. | 2 | Demonstrate that the Member has adopted a policy/ies that: <ul style="list-style-type: none"> <li>- documents its commitment to responsible business practices,</li> <li>- is endorsed by senior management,</li> <li>- communicated to Employees and</li> <li>- made publicly available.</li> </ul> | <ul style="list-style-type: none"> <li>- Policy/ies documenting the Member's commitment to responsible business practices.</li> <li>- Arrangements for communicating the policy/ies to Employees and making the policy/ies available to the public.</li> </ul>   |                           |   |                                    |                                       |

Snip from part 3a – Assessment Questions.

#### Part 3b Summary of Assessment Findings (Tabulated and Chart)

[Go To Chart](#)

| COP Provisions                                    | # Relevant Provisions | # Completed Provisions | % Completed Provisions | # Conforming Provisions | # Minor Non-Conformances | # Major Non-Conformances | # Not Applicable Provisions |
|---|-----------------------|------------------------|------------------------|-------------------------|--------------------------|--------------------------|-----------------------------|
| 1. Legal Compliance                               | 1                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 2. Policy and Implementation                      | 2                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 3. Reporting                                      | 2                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 4. Financial Accounts                             | 2                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 5. Business Partners                              | 2                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 6. Human Rights                                   | 2                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 7. Sourcing from Artisanal and Small-Scale Mining | 1                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 8. Community Development                          | 1                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 9. Bribery and Facilitation Payments              | 3                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 10. Money Laundering and Finance of Terrorism     | 2                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 11. Security                                      | 4                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 12. Provenance Claims                             | 1                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 13. General Employment Terms                      | 3                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 14. Working Hours                                 | 4                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 15. Remuneration                                  | 6                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |
| 16. Discipline and Grievance Procedures           | 3                     | 0                      | 0.0%                   | -                       | -                        | -                        | -                           |

Snip from part 3b – Summary of Assessment Findings.

**Non-Conformance Rating**  
Please select the performance rating for this requirement from the following list:

- Minor Non-Conformance
- Major Non-Conformance

Please refer to the Conformance Rating Worksheet for the definitions.

*Snip from part 3d – Corrective Action Plan*

The above decision-making mechanisms are required to be consistently applied, and RJC reviews every audit report for consistency with its published requirements, seeking further information or clarification from assurance providers if required.

#### 4.4 Remediation and sanctions for different gradations of non-conformity (6.4.10 baseline)

Corrective Action plans for all types of non-conformances are required of Members, and this is designed to support a continuous improvement approach.

Section 5.5 of the Assessment Manual covers how non-conformances should be documented so as to identify how the problem could be prevented from recurring.

Section 5.6 describes the process for developing Corrective Action plans, and a template for a Corrective Action Plan is provided in Appendix 2 of the Manual, as well as in the RJC Assessment Workbook and relevant toolkits (eg Risk Assessment Toolkit, Human Rights Due Diligence Toolkit).

Section 5.4 details the obligations of resulting from Non-Conformances for both the Code of Practices and Chain-of-Custody standards in relation to follow-up action and timeframes – see Table 7 below.

**TABLE 7: OBLIGATIONS RESULTING FROM A NON-CONFORMANCE BY RJC STANDARDS**

| Conformance Rating    | Code of Practice   | Chain of Custody   |
|-----------------------|--|--|
| Minor Non-Conformance | Members with Minor Non-Conformances are eligible for a 3 year COP Certification provided they prepare adequate Corrective Action Plan/s. These may be reviewed by the Auditor during subsequent audits.  | Entity's Corrective Action Plans are in place, approved by the Auditor. These will be subject to verification at the time of the next Audit.   |
| Major Non-Conformance | <p>Members with Major Non-Conformances are eligible for a 1 year COP Certification provided all Major Non-Conformances have been adequately addressed or captured in a Corrective Action Plan approved by a Lead Auditor. The Corrective Action Plan must be submitted to the Auditor for approval within 1 month of the audit.</p> <p>If a Major Non-Conformance is found during a Mid-Term Review, the COP Certification Period will be reduced to 1 year.</p> <p>Remember all Members are expected to transition from a 1 Year period to the full 3 Year Certification Period as soon as practicable (see section 3.6).</p> | <p>If a Major Non-Conformance is found during a Certification Audit or a Re-certification Audit, the Member shall not be recommended by the auditor for CoC Certification.</p> <p>If a Major Non-Conformance is found during the Surveillance Audit, CoC Certification will be suspended. Outsourcing Contractors with any Major Non-Conformances will be excluded from the scope of the Certification. A company may request another audit at any time, once it has addressed any Major Non-Conformances.</p> |
| Critical Breach       | <p>A Major Non-Conformance for a Critical Provision raised by an independent Auditor will result in a Critical Breach.</p> <p>Auditors shall cease any audit activity if a Critical Breach is found during an audit, and shall immediately notify the Critical Breach to the RJC Management Team. Disciplinary proceedings will commence (see section 11).</p>   | <p>Deliberate falsification of CoC Material, falsification of records for CoC Material, or falsification of information provided to auditors will result in a Critical Breach. Auditors shall cease any audit activity if a Critical Breach is found during an audit, and shall immediately notify the Critical Breach to the RJC Management Team. Disciplinary proceedings will commence (see section 11).</p>  |

Critical Breaches trigger the processes of sanctions outlined in the [RJC Complaints Mechanism](#), which include:

- Requirement for corrective action plans
- Suspension or withdrawal of certification
- Temporary or permanent loss of RJC Membership
- Suspension or withdrawal of accreditation (auditors)

The RJC's Articles of Association describe the disciplinary proceedings which may result in loss of RJC Membership, available at: <http://www.responsiblejewellery.com/policies/>.

#### **4.5 Policy on whether and how information from sources other than the assurance provider can be included in the assessment (6.4.7 improvement)**

As a management systems program, the RJC's standards are designed to harmonise with other standards and initiatives wherever possible. Auditors are asked to place a high value on existing certifications under systems which have equivalent requirements to the relevant RJC standards.

Section 3.2 of the RJC Assessment Manual section 3.2 notes where certifications/assessments from other schemes are recognised by RJC and, where equivalency has been determined, can be accepted by assurance providers as evidence of conformance for the relevant identified provisions without additional review. Equivalency determinations have been made for the following standards in the current edition of the Assessment Manual:

Code of Practices:

- SA8000: 2008
- ISO 14001: 2004
- OHSAS 18001: 2008
- Recognised Responsible Mining Standards: currently Fairtrade and Fairmined for artisanal gold mining.

Chain-of-Custody:

- Conflict-Free Sourcing Initiative – Smelter/Refiner Validation
- Dubai Multi-Commodities Centre (DMCC) Practical Guidance and Review Protocol
- London Bullion Market Association (LBMA) Responsible Gold Guidance
- World Gold Council Conflict-Free Gold standard
- Recognised Responsible Mining Standards: currently Fairtrade and Fairmined for artisanal gold mining.

#### **4.6 Requirements for the certificate, which identifies the product, process, or service to which it applies (6.4.11 baseline)**

Section 9 of the RJC Assessment Manual set out how RJC governs the issuing of RJC certification and the publication of information the RJC website.

In summary:

- RJC issues certificates to Certified Members, following review of the submitted audit report to confirm that the RJC assessment process has been followed and all required information is included in the report;
- Certificates are issued for the Certification Period – three years in most cases, or one year in the case of Major Non-Conformances where there has been a Corrective Action Plan signed off by the assurance provider;
- Information included in the Certificate includes the name of the Member, geographic location/s and facility/ies, the date Certification becomes effective and expires, the RJC Standard used as criteria for the Audit, and applicable provisions / materials covered.
- RJC maintains up-to-date and searchable information on all Members on the RJC website.

Certification can be withdrawn following an investigation via the RJC Complaints Mechanism <http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>.

Labelling and marketing of RJC Certification is covered in section 9.3 of the Assessment Manual. Members must not use the RJC logo or Certification number in a manner that makes any misleading statements regarding its Certification. Members must not imply that the Certification applies to facilities or materials

outside of the Certification Scope. A more detailed Rule for the Use of the Responsible Jewellery Council Logo, Trademarks and Intellectual Property document is also available on the RJC website:

[http://www.responsiblejewellery.com/files/RJC\\_LOGO\\_GUIDE-for-Members-April-2012.pdf](http://www.responsiblejewellery.com/files/RJC_LOGO_GUIDE-for-Members-April-2012.pdf)



## **5. Assessment of Groups (where applicable)**

Not applicable. As noted earlier, RJC does not conduct assurance of groups of enterprises. While RJC Members may comprise multi-site operations, these must all be under the ownership and management control of the RJC Member entity.

## 6. Oversight

### 6.1 General description of the oversight procedure (6.1.1 baseline)

RJC's oversight mechanism has three main dimensions:

- Auditor accreditation process by which competence of both the assurance provider and assurance personnel are initially evaluated by an independent accreditation specialist, and formally re-evaluated at least every 4 years;
- Internal review by the RJC team of all audit reports, to ensure consistent performance of assurance providers in meeting the requirements of the RJC assessment process – a continuous evaluation process;
- Annual review of consistency and impartiality of assurance and the RJC decision-making process by an independent party – an annual review of RJC's oversight mechanism.

In addition, the RJC Complaints Mechanism provides an ad hoc oversight mechanism whereby stakeholders can raise concerns for investigation, and there are provisions for appeal.

RJC makes all key information about the design of its assurance scheme available on its website, particularly in the RJC Assessment Manual and the information on assurance providers and the accreditation process on the 'Auditors' pages on the RJC website. For more information see:

- <http://www.responsiblejewellery.com/auditors/become-an-auditor/>
- RJC Assessment Manual, particularly sections 8, 9 and 10.
- RJC Complaints Mechanism: <http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>

### 6.2 Frequency and intensity of oversight (6.6.1a or 6.6.4 - baseline)

As noted in the section above, RJC carries out oversight of assurance providers both directly through a combination of continuous and periodic evaluations and through the accreditation process overseen by an independent accreditation specialist. Frequency of oversight includes:

- Every audit report submitted by each assurance provider (different RJC assurance providers carried out between 1 and 40 audits per year in 2013);
- Annual review of consistency for all audit reports in a calendar year;
- Every four years, a re-accreditation process to confirm continued conformance with RJC's requirements for assurance providers.

|  |   |
|--|---|
| Queries with Auditor?: <input checked="" type="radio"/> Yes <input type="radio"/> No ? |   |
| Subject of Auditor query:  | <input type="checkbox"/> More information needed about auditors<br><input type="checkbox"/> Clarification about certification recommendation<br><input type="checkbox"/> Clarification about Certification Scope<br><input type="checkbox"/> Clarification about conformance rating/s<br><input checked="" type="checkbox"/> Clarification about Not Applicable rating/s<br><input checked="" type="checkbox"/> Report typographical error/s<br><input type="checkbox"/> Clarification about audit scope including alignment with Cert Scope<br><input checked="" type="checkbox"/> Other |
| Notes on Auditor Queries:  | <div>Asked about number of employees.</div>   |

The above combination of frequency and intensity provides a reasonable level of oversight of the assurance process. The annual Auditor Consistency Review provides a further opportunity to assess the adequacy of the frequency and intensity of oversight procedures, and potential improvements may be identified.

### 6.3 List of the accreditation or oversight bodies operating in the standards system (*part of 6.1.1 baseline*)

There are no other accreditation or oversight bodies actively operating in the RJC standards system. However RJC takes into account as part of its accreditation process the accreditation and oversight of assurance providers by other accreditation schemes that, at a minimum, are recognised by the International Accreditation Forum.

At August 2014, RJC Accredited Auditors evidenced their participation in the following accreditation schemes:

- United Kingdom Accreditation Service (UKAS)
- Le Comité Français d'Accreditation
- Swiss Accreditation Service
- ANSI-ASQ National Accreditation Board
- Accredia (Italy)
- Social Accountability Accreditation Services (SAAS)
- Accreditation Services International (ASI)
- Extractive Industries Transparency Initiative (EITI)

### 6.4 Status of compliance of accreditation bodies with ISO 17011 (*6.6.1b baseline*)

While as noted above there are no other accreditation bodies operating in the RJC system, RJC's accreditation process has been developed to conform with ISO 17011: 2004 *Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies*. This is set out in the RJC Accreditation Process and Criteria document, available at:

<http://www.responsiblejewellery.com/auditors/become-an-auditor/>

Since RJC takes responsibility for the design of the accreditation process, it has placed emphasis on ensuring that its policies and procedures are impartial, rigorous and non-discriminatory. Key aspects of its procedures are:

- Independence of the oversight from the assurance providers, whether undertaken by the RJC team or independent specialists.
- Publicly documented RJC procedures and application form for auditor accreditation, including requirement for documented evidence of current certificates, operating manuals, auditor CVs and audit logs.
- Allowing applications from assurance providers via both proxy accreditation (existing accreditation under a recognised accreditation scheme) and via direct review, to ensure there is not discrimination against smaller or more specialised assurance providers.
- Developing a Topic Expert accreditation program so that smaller assurance providers or individuals with relevant expertise can form part of assurance teams for Accredited Auditors, under contract and under the direction of a recognised Lead Auditor.

**6.5 Overview of any other requirements that oversight bodies are required to meet (6.6.3 *baseline*) including how the standards system owner ensures that the oversight mechanism is independent of the assurance providers being assessed (part of 6.6.1a *baseline*)**

The review of accreditation applications by assurance providers is carried out by a specialist, independent to both RJC and applicants, commissioned to ensure competence and impartiality. This specialist has in-depth knowledge of the RJC standards and assurance framework, and was involved in the 2013 revision of the RJC Assessment Manual and Assessment Workbook. He has full online access to the RJC WORK[etc] database and audit reports, and can therefore analyse, sample and aggregate primary data for review purposes as required and without restrictions.

**6.6 Whether proxy accreditation is used, and the additional measures taken to assess competence in those cases (6.6.2 *improvement*)**

Oversight is carried out both by RJC, and by recognised accreditation schemes for ISO 17021 that fulfil part of RJC's accreditation requirements (proxy accreditation). This reduces duplication for assurance providers by making use of relevant existing accreditation and oversight processes.

RJC accreditation provides for different geographical and sector scopes of accreditation. This is assessed during the accreditation process via submitted information about both assurance provider (management systems documentation) and personnel competence (individual CVs), with the resulting scope for the assurance provider listed on the RJC website.

## Accredited Auditors

RJC aims to develop a wide range of auditors with relevant experience across a breadth of operating regions. The pool continues to grow and we welcome interest from potential auditors to expand the availability for Members and other businesses with a need for assurance services.

### Current Accredited Auditors

Below (in alphabetical order) are the contact details for RJC Accredited Auditors, as well as general information on their scope, location and regions in which they are accredited to operate.

If you have any general questions about engaging an Accredited Auditor, please contact [accreditation@responsiblejewellery.com](mailto:accreditation@responsiblejewellery.com)

| Auditor Details  | Scope of Accreditation  | Auditor Coverage |
|--|---|------------------|
| <p>Bureau Veritas Italia</p> <p><b>Contact Details</b></p> <p>Diego D'Amato<br/>Phone: +39 02270 91352</p> <p>Email:<br/><a href="mailto:diego.damato@it.bureauveritas.com">diego.damato@it.bureauveritas.com</a></p> <p>Website: <a href="http://www.bureauveritas.com">www.bureauveritas.com</a></p> | <p><b>Standards</b></p> <p>Code of Practices<br/>Chain-of-Custody</p> <p><b>Sectors</b></p> <p>Diamond Mining<br/>Diamond Trading<br/>Diamond Cutting or Polishing<br/>Gold Mining<br/>Gold Processing &amp; Refining<br/>Gold Hedging or Trading<br/>Platinum Mining</p> | <p>Global</p>    |

RJC possesses the competencies of in-depth knowledge of the standard, and competence to review sampling protocols and implementation of assessment in practice. Based on this, and to strengthen the performance of assurance providers, RJC reviews all client assessment reports and follows up on gaps or discrepancies with assurance providers. Finally, RJC commissions an annual Auditor Consistency Review, which includes a review of the effort (time spent on site) for audits – another of the dimensions of optional good practice in the ISEAL Assurance Code.

## 7. On-going Scrutiny

### 7.1 Description of market surveillance and repercussions of fraud (6.7.1 improvement and 6.7.2 baseline)

The RJC certification process provides for unique certification numbers for each individual successful certification audit, which allows for traceability of successive certification status. The history of all RJC audits and certification numbers for each Member are maintained on the [RJC website](#). This allows interested stakeholders to verify certification information directly.

RJC also undertakes a periodic review of Member websites to check for representations of RJC Certification. Where these do not comply with RJC rules, Members are required to amend their website accordingly. The RJC Complaints Mechanism includes coverage of fraud or misrepresentation and sets out the steps that will be taken for investigation and sanctions that will apply.

<http://www.responsiblejewellery.com/contact-us/rjc-complaints-mechanism/>



## 8. Other

### 8.1 Links to current list of clients and expiry date of their certificate (6.1.1 baseline)

A list of RJC Certified Members is available at: <http://www.responsiblejewellery.com/members/certified-members/>

Below are a number of images taken from the RJC website to illustrate:

- Searchable list of RJC Certified Members;
- Examples of an individual Member's page and the links to certification status information – one with Code of Practices certification, and one with both Code of Practices and Chain-of-Custody certification;
- Examples of RJC Certificates / Certification Information – extracts.

Full information is available on the website.

Responsible Jewellery Council » Members » Certified Members

## Certified Members

A Certified Member has undergone independent, third party auditing to show that their business practices at all facilities within the Certification Scope conform to RJC's Code of Practices for business ethics, human rights, social and environmental performance. For the Code of Practices, RJC certifies Members rather than each separate facility, in order to encourage broader uptake of responsible business practices across all relevant facilities within a company.

**Certification Scope:** Each RJC Commercial Member **must** include all the facilities that they own or control which contribute to the diamonds, gold and platinum group metals supply chain within their Certification Scope. Details on the Certification Scope for each Certified Member can be found by clicking on the individual Member link, and then clicking the link under 'Certification Information'.

RJC welcomes inquiries and comments on Certification Scope of Members – please direct these to [info@responsiblejewellery.com](mailto:info@responsiblejewellery.com)

Any concerns about RJC Certified Members or Certification Scope can also be raised through the [RJC Complaints Mechanism](#).

|   |   |
|---|---|
| Total RJC Code of Practice Certifications: <b>326</b> | Total RJC Code of Practice Re-certifications: <b>37</b> |
| Total RJC Chain of Custody Certifications : <b>11</b> | Total RJC Certification Audits Conducted: <b>374</b>    |

A'Star Jewellery (A division of Asian Star Company Limited)  
**Date joined:** June 2012  
**Website:** <http://www.astarjewellery.com>

☒ A.C. Diam BVBA  
**Date joined:** June 2009  
☒

☒ AA Rachminov Diamonds (2000) LTD  
**Date joined:** November 2012  
**Website:** <http://www.aarachminov.com>

By clicking on a Certified Member, you are directed to a Members' page where you can download the Members' current and previous Audit and Certification Information document for the COP Certification (highlighted below), and CoC if relevant

Responsible Jewellery Council » Members » Aurum Holdings Ltd (Goldsmiths, Mappin & Webb, Watches of Switzerland)

## Aurum Holdings Ltd (Goldsmiths, Mappin & Webb, Watches of Switzerland)

**Date Joined:** July 2009  
**Website:** <http://www.aurumholdings.co.uk>  
**Head Office Location:** Leicester, United Kingdom  
**Membership Forum:** Jewellery retailer



RETAILER

### Member Certification Information

#### Current Certification

**Audit and Certification Scope Information:** [Download PDF](#)  
**Certification Number:** 0000 0360  
**Certification Period:** 30/05/2014 - 30/05/2017

#### Previous Certification

**Audit and Certification Scope Information:** [Download PDF](#)  
**Certification Number:** 0000 0011  
**Certification Period:** 01/06/2011 - 01/06/2014

**Press Releases:** [AURUM HOLDINGS LTD RE-CERTIFIED AGAINST NEW RJC CODE OF PRACTICES](#)



| RJC CERTIFICATION INFORMATION<br>– CODE OF PRACTICES<br><i>Summary</i> |  |
|--|--|
| <i>Certified Member</i>  | Aurum Holdings Ltd (Goldsmiths, Mappin & Webb, Watches of Switzerland) |
| <i>Membership Forum</i>  | Jewellery Retailer   |
| <i>Certification Number<br/>for this Certification</i>                 | 0000 0360  |
| <i>Certification Period</i>  | 30 May 2014 – 30 May 2017  |
| <i>Audit Date</i>  | 22-23 April 2014   |

A snip from a Member's Certificate and Audit and Certification Information for the 2013 Code of Practices.

For Chain-of-Custody Certified entities, a list is maintained at:

<http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/>

### Chain-of-Custody Certified Entities List

Below are the Companies which have Entities that have individually achieved CoC Certification – each Entity must be under the control of an RJC Member. To find out more about the CoC Certification Scope of these entities click on the name of the Company.

#### Chain of Custody Certified Entities

RJC Member: Rio Tinto 

**Certified Entity:** Kennecott Utah Copper LLC

**Audit and Certification Scope Information:** [Download PDF](#)

**Certification Number:** C0000 0007

**Certification Period:** 07/10/2013 - 07/10/2016

RJC Member: Allgemeine Gold - und Silberscheideanstalt AG 

**Certified Entity:** Umicore Precious Metals (Thailand) Ltd

**Audit and Certification Scope Information:** [Download PDF](#)

**Certification Number:** C0000 0005

**Certification Period:** 19/06/2013 - 19/06/2016

**Certified Entity:** Allgemeine Gold- und Silberscheideanstalt AG

**Audit and Certification Scope Information:** [Download PDF](#)

**Certification Number:** C0000 0006

**Certification Period:** 13/08/2013 - 13/08/2016

By clicking on the relevant Certified Member, you are being directed to the Member's website where you can download the Audit and Certification Information document for the COP and CoC (highlighted below).

## Valcambi SA



**Date Joined:** January 2013  
**Website:** <http://www.valcambi.com>  
**Head Office Location:** Switzerland  
**Membership Forum:** Gold and/or platinum group metals trader, refiner hedger

### Member Certification Information

#### Current Certification

**Audit and Certification Scope Information:** [Download PDF](#)  
**Certification Number:** 0000 0368  
**Certification Period:** 03/07/2014 - 03/07/2017

### Chain-of-Custody Certification Information

#### Current Certification

**Certified Entity:** Balerna, Switzerland  
**Audit and Certification Scope Information:** [Download PDF](#)  
**Certification Number:** C0000 0011  
**Certification Period:** 03/07/2014 - 03/07/2017

**Press Releases:** [VALCAMBI SA ACHIEVES BOTH COP 2013 AND CoC CERTIFICATION](#)



3 July 2014

**RJC CoC Certification Information – Valcambi SA**

|  |  |
|--|--|
| <b>Date of the Audit:</b>                | 12-13 and 18 June 2014   |
| <b>Accredited Auditor:</b>               | Bureau Veritas Italia<br><u>Lead Auditor:</u> Maaïke Wycisk-Timpert  |
| <b>RJC Member which controls Entity:</b> | Valcambi SA  |
| <b>Entity Certification Scope:</b>       | Valcambi SA<br><ul style="list-style-type: none"> <li>o Facility/ies: Balerna, Switzerland</li> <li>o Type/s of CoC Material: Gold, Platinum</li> <li>o Eligible Material Declarations: Recycled, Grandfathered</li> </ul> |

*A snip from a Member's Audit and Certification Information PDF for Chain-of-Custody Certification – the format of these Certificates and Audit and Certification Information document will be updated in August/September 2014 to align with the new format for the 2013 Code of Practices.*

## **8.2 List of clients whose certificate has been rescinded or withdrawn (6.1.1 improvement)**

As noted above, RJC's list of Certified Members is already consolidated at the scheme owner level, and the list identified in the above section of this report is the authoritative list of current Certificates.

RJC's procedure is that if Members do not continue their Membership (including the payment of their annual membership fee), then their details are removed from the RJC website along with their Certification details (if applicable). To date, discontinuing Members have only been Members that have not achieved certification within their deadline. Past (ex-) Members are not listed, only current. As RJC maintains a centralised list of current Members and certifications, this is deemed sufficient to meet the objectives of this provision, as searching for a list of current certificates versus a list of rescinded certificates still requires a search of the RJC website in either case.