Frequently Asked Questions (FAQ's)

Responsible Jewellery Council

RJC Auditor Accreditation & Conducting RJC Verification Assessments

Please contact

training@responsiblejewellery.com
if you have any questions. Click here
for the RJC Team Contacts on our
website



How do we become an Accredited Auditor?

The Council welcomes applications from Conformity Assessment Bodies (CABs) and Auditors to become accredited under the RJC Certification system. The RJC Accreditation Process & Criteria document, along with the RJC Accreditation Application Form, provides detail on the accreditation process and can be downloaded from the RJC website: http://www.responsiblejewellery.com/auditors/become-an-auditor/.

The application form and any questions should be sent to accreditation@responsiblejewellery.com

Are we eligible to become an Accredited Auditor?

CABs that currently hold Accreditation to ISO/IEC 17021:20062 by a third party firm that is a member of the International Accreditation Forum for management system certification schemes, or can demonstrate independent conformance with the requirements of ISO/IEC 17021:2006 (or ISO/IEC Guide 65), can apply for RJC Accreditation. CABs or Auditors that are not compliant with 17021:2006 (or ISO/IEC Guide 65), may still be eligible to conduct RJC Verification Assessments under a subcontract arrangement with a CAB that is compliant.

Please contact accreditation@responsiblejewellery.com with any guestions.

Where do I find a list of Accredited Auditors

A list of RJC Accredited Auditors can be found on the website: http://www.responsiblejewellery.com/auditors/accredited-auditors/

How much do the Auditors charge to conduct a Verification Assessment?

The RJC has ascertained that approximate daily fees will range from £500 to over £1000. (N.B. Currencies will vary between audit firms depending on the countries of operation.) This indicative cost of audits has been provided for general information and should not be relied upon. It must be understood that the cost of an audit is a matter negotiated between the auditor and client. The final price of an RJC Verification Assessment will depend on a range of variables such as the timing of the audit, the complexity of the task, the size and nature of the Member's operations and the physical location of the Member's facilities.

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If we are a Members Financial Auditor can we conduct the Verification Assessment?

Yes, if you are an RJC Accredited Auditor and have not been involved in conducting the Member's Self Assessment or other matters that may present a conflict of interest during the Verification Assessment. Accredited Auditors and Members are reminded that the engagement of an RJC Accredited Auditor that is also a Member's financial auditor may be subject to restrictions in accordance with legislation in the US and other jurisdictions.

Accredited Auditors must identify and report to RJC any independence-related risks, or conflict of interest matters (perceived or actual) that may prevent them from operating in accordance with the requirements for RJC Certification <u>prior to the commencement</u> of a verification assessment.

How do we deal with a potential conflict of interest?

The RJC Accreditation process seeks to ensure that CABs and their auditors have appropriate experience and expertise and that there is no conflict of interest when undertaking Verification Assessments for individual Members. The RJC System is premised on impartiality and independence criteria as required in the RJC Auditor <u>Accreditation Process and Criteria</u> document (No.T004_2009), which is available from the RJC website. The RJC's Auditor Accreditation criteria are aligned with ISO17021. CABs (referred to as certification bodies in the extract below) are required to be independent of the activity being assessed and free from bias and conflict of interest. Element 5.2.2 from ISO17021 states:

The certification body shall identify, analyse and document the possibilities for conflict of interests arising from provision of certification including any conflicts arising from its relationships. Having relationships does not necessarily present a certification body with a conflict of interest. However, if any relationship creates a threat to impartiality, the certification body shall document and be able to demonstrate how it eliminates or minimizes such threats. This information shall be made available to the committee specified in 6.2. The demonstration shall cover all potential sources of conflict of interests that are identified, whether they arise from within the certification body or from the activities of other persons, bodies or organizations.

The following examples explore whether a conflict of interest may be present:

- 1. <u>Assisting with the Self Assessment:</u> RJC Members may choose to seek external assistance of a competent consultant or advisor to assist them with their Self Assessment. However any such person involved in the Self Assessment cannot play a role in the Verification Assessment, as this represents a conflict of interest.
- 2. <u>Using the existing company auditors:</u> RJC Members may wish to use an RJC Accredited CAB for the Verification Assessment that they already use for other management systems audits. As long as they have not been involved in the Self Assessment, or played a role in establishing the required management systems for the RJC Code of Practices, this does not represent a conflict of interest.
- 3. Perception of impartiality: RJC Members may contract an RJC Accredited CAB to carry out audits (RJC or non-RJC) on the Members' customers or suppliers in the diamond & gold supply chain. This could present a potential or perceived conflict of interest for the CAB in the form of a financial interest beyond that of the normal auditor auditee relationship. The CAB must consider whether it can also conduct an RJC Verification Assessment for the Member, and if so, document how it will manage the conflict of interest (as per ISO17021, Element 5.2.2).

CABs are required to confirm in their Verification Reports that they have no conflict of interest in carrying out verification for that Member. If a potential conflict of interest exists between a Member and an RJC Accredited CAB, this could compromise the integrity of the RJC System. In this situation, the CAB must document and demonstrate to the RJC Management Team how it has eliminated the potential conflict of interest prior to the Verification Assessment. If the CAB fails to do this, the independence of the CAB's Verification Assessment could be under question and the RJC may not grant Certification to the Member. If the conflict of interest cannot be eliminated, then an alternative RJC Accredited CAB, free from bias and conflict, must be selected by the Member to conduct the Verification Assessment.

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What do the Auditors need to do?

Independent, third party auditors play a key role in the RJC Certification Process. RJC Accredited Auditors conduct the Verification Assessment (Audit) and carry out the following steps:

- Conduct a desktop review of the Member's Self Assessment and other relevant documentation.
- Define the Verification Scope.
- Establish a Verification (Audit) Plan.
- Assign the audit team and Lead Auditor.
- Conduct the Verification Assessment.
- Monitor the Member's progress on implementing any Corrective Action Plans.
- Submit to the Member a Verification Report Summary and a recommendation report to the RJC Management Team.

How do we as Auditors determine the Verification Scope?

The Verification Scope is defined by the Auditor and is the selection of the Member's facilities and relevant provisions in the Code of Practices to be reviewed during the Verification Assessment. The Verification Scope Includes:

- A selection of Facilities from within the Certification Scope; and
- A selection of provisions from the Code of Practices that are considered to be the most relevant, taking into consideration the nature, scale and impact of the Member's business.

[Reference: Assessment Manual, page 20]

The Verification Scope should be determined so as to:

- Take account of Risk and relevance using available information e.g. the Member's Self Assessment, public reports, legislative frameworks, the results of previous assessments, and any existing Certifications.
- Fit within the recommended time limits, or as otherwise negotiated (see section 4.2.3.2).
- Obtain the necessary Objective Evidence to make a recommendation on Certification to the RJC Management Team.
- Be documented in a Verification Plan (audit plan) detailing which Provisions are to be assessed at which Facilities (see section 4.2.6 in the Assessment Manual).

The Verification Scope should encompass some or all of the following activities, for some or all of the Code of Practices:

- 1. A review at a head office or at a central location of the Member's common and companywide systems and procedures.
- 2. A review of divisional or Facility specific systems and procedures.
- Verification of the implementation of those specific systems and procedures at a selected set of target locations, based on the nature, scale and impacts of the Member's business practices.

The Verification Scope must be sufficient for the Auditor to establish confidence that the Member can be recommended for Certification to the RJC Management Team.

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What should we do if we discover during the audit that a Facility that is involved in gold and diamond supply chain and under the Control of a Member has not been included in the Certification Scope?

The Certification Scope determined by the Member for the Self Assessment must include all Facilities that the Member owns and controls and that actively contributes to the diamond and gold jewellery supply chain. If during the Verification Assessment you find a Facility that has not been included then this must be raised with the Member. If the Facility meets the criteria for inclusion in the Certification Scope then it must be included. Any areas of uncertainty, or where this is dispute between the Member and the Auditor, should be raised directly with the RJC. Contact certification@responsiblejewellery.com

We ask to see documented risk assessments during the Verification Assessment, is this ok?

Risk assessments involve a deliberate effort to identify things that can have a negative impact on a business, and what actions are going to be undertaken to reduce the likelihood that they will happen, or to reduce the consequences if they do. As a minimum, we recommend risk assessments for those standards that are of greatest relevance and greatest risk of non-compliance for the business should be documented. However it is not compulsory and other forms of evidence such as demonstration of risk assessment procedures can also be sought by Auditors, particularly for small businesses.

Can you provide an example of a sampling methodology?

The process of collecting Objective Evidence for an assessment, whether by the Member or the Auditor, will require that some level of sampling be applied. This might be a sample of documentation and records, interviewing a representative selection of personnel, or observing the key functions.

Sample methods need to ensure that representative samples are used and not biased in some way.

Ultimately, the sample must be enough to objectively support conformance or non-conformance with a requirement. The size of the sample, particularly in relation to the total population, will naturally influence the confidence in the audit results. The sample size needs to be sufficient to provide a reasonable level of confidence that it is representative of the larger group. For example, one guideline is to sample the square root of the total relevant records. However for large numbers of consistent records, a much smaller sample may be sufficient. Sampling should be carried out to access enough evidence to verify that systems and process are in place and are effective.

What level of assurance are we providing as Auditors?

Terms like 'reasonable assurance' and 'limited assurance' are commonly used in financial report audits. It is widely understood that audits involve a risk based and random sampling process.

Limited assurance provides a lower level of confidence in an audit outcome than reasonable assurance and hence there is a higher risk of the audit missing something. This distinction is not formally made by the IAF (International Accreditation Forum) or by ISO for its suite of management standards. However, when you look at the IAF and ISO requirements, they are aligned with what you would expect from a reasonable assurance process.

The RJC Member Certification system expects a reasonable level of assurance from the verification assessment. It is acknowledged that the verification assessment is not an inspection (designed to provide complete assurance) but a sampling process that offers a reasonable level of confidence about the audit findings.

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The methodology for RJC Verification Assessments can only ever provide 'reasonable assurance' as the process involves random sampling rather than a detailed inspection. No one audit will ever pick up everything, and given the time and cost implications, reasonable assurance is the most that can be expected. Successive verification assessments at the recertification stage should sample from a different pool of objective evidence, so that over time a more comprehensive evaluation of the Member's performance can be established.

What reports do the Auditors need to provide after conducting a Verification Assessment?

Lead Auditors coordinate the collation of all findings and information, and then prepare two reports, one for the Member and one for the RJC Management Team, respectively as follows:

Member Verification Report

The Verification Report provides an overall assessment of the Member's conformance with the relevant Provisions in the RJC Code of Practices and the effectiveness of the Member's practices, and offers conclusions and recommendations. A suggested Table of Contents is provided in Appendix 5 of the RJC T001_2008 Assessment Manual but may be further negotiated between the Member and Auditor. The Lead Auditor is responsible for ensuring the Report is accurate and that it is completed within a suggested 2 – 3 week timeframe (or within a period as agreed with the Member) from the final date of the Verification Assessment. The Report (and supporting documentation) shall be issued to the nominated Member representative in a language and format that is understood by the Member's representatives and management. The RJC recommends that a draft copy of the Member Verification Report be initially forwarded to the Member for their comment and any correction of facts. The Verification Report is confidential and must NOT be submitted to the RJC.

Certification Recommendation & Summary Report

The Lead Auditor must also prepare a summary report for the RJC summarising the results of the Assessment. A template table of contents for the Certification Recommendation and Summary Report is available in Appendix 6 RJC T001_2008 Assessment Manual.

In general, the information included in the report should be sufficient:

- To support the Lead Auditor's Certification Recommendation
- For the RJC Management Team to take an informed decision on endorsing the Certification recommendation
- For traceability to be available in the event, for example, of a dispute, peer review or for planning for the next assessment.

The Certification Recommendation and Summary Report must include the Recommendation Statement and Auditor Statement, the template for these is available in Appendix 6 of the RJC T001_2008 Assessment Manual. RJC will follow up with Auditors on any missing or ambiguous information in Summary Reports. The Certification Recommendation & Summary report should be submitted in the English language and emailed to: certification@responsiblejewellery.com

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