

## Frequently Asked Questions (FAQ's)

### Responsible Jewellery Council

### RJC Member Certification – Small Businesses

Please contact:  
[training@responsiblejewellery.com](mailto:training@responsiblejewellery.com)  
if you have any questions  
[Click here](#) for the RJC Team Contacts  
on our website



Is the RJC Certification applicable for a Small Business?
<p>Yes. RJC Certification is not focussed solely on larger businesses or on any particular part of the supply chain. It has been designed to apply to all types of businesses, small and large.</p> <p>Achieving RJC certification will not be less stringent for smaller organisations, but Auditors will look for evidence that takes the nature and size of the business into account. The Management Systems for a small business may look very different to that for a large business, but can still be effective.</p>
What are our Management Systems?
<p>Every business has management systems, including small businesses, whether they are viewed as such or not. Small organisations frequently operate with less formality where there might be flexible roles and responsibilities; greater reliance on verbal communication/instructions; and less reliance on information technology. Lack of formality does not mean that there are weak management systems. Your business practices are the results of your management systems.</p> <p>When addressing the RJC Code of Practices requirements, you should review relevant existing business systems used currently by the organisation (such as financial, human resources and general administration) to identify those which can meet the requirement or can be modified. This approach aims to minimise unnecessary effort and ensure that ethical, social and environmental management becomes part of day-to-day management.</p> <p>In verifying compliance with the RJC Code of Practices, Auditors will focus attention on whether Members have the appropriate management systems in place.</p> <p>Effective management systems actually can be quite simple - in essence, you need to be:</p> <ul style="list-style-type: none"><li>• Clear about what it is that is supposed to be done; and</li><li>• People know about it, and they can, and do, do it; and</li><li>• We know all of this, because of records.</li></ul>
What should we do first?
<p>Review the Core System Documents. The <a href="#">RJC Certification Handbook</a> provides an overview of the RJC System and the requirements for achieving certification; this is a good document to review first. The following documents will assist you on working through the Self Assessment:</p> <ul style="list-style-type: none"><li>• The RJC Assessment Manual, which provides instructions for Members and Auditors in conducting Assessments.</li></ul>

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The Responsible Jewellery Council is the trading name of the Council for Responsible Jewellery Practices Ltd, The Council for Responsible Jewellery Practices Ltd, First Floor, Dudley House 34-38 Southampton Street, London, United Kingdom WC2E 7HF. The Council for Responsible Jewellery Practices is registered in England and Wales with company number 05449042.

- The Assessment Workbook, which provides forms and detailed questions used in the carrying out of Assessments, and
- The Standards Guidance, which provides information and advice about the Code.

It is very important that anyone involved in conducting a Self Assessment is familiar with the Core System Documents. Please refer below for more details on the Self Assessment Workbook and the Standards Guidance. Completing the Self Assessment is the first step and allows you time to prepare for the Verification Assessment (Audit) prior to engaging with the Auditor.

The RJC Core System Documents are available to download from: <http://www.responsiblejewellery.com/quick-downloads/rjc-certification-system-documents/>

Please also refer to the Frequently Asked Questions documents on RJC Member Certification – First Step, Self Assessment and RJC Member Certification – Verification Assessment. These will provide you with further guidance on the steps to achieving RJC Certification.

We also have RJC Training available to assist Members with the RJC Certification process. For information on training please email: [training@responsiblejewellery.com](mailto:training@responsiblejewellery.com)

Do you have any suggestions on how to implement a provision within our organization?

The [Standards Guidance](#) provides full details on the issue background, key regulations and the suggested management approach for each of the Standards in the [Code of Practices](#). We recommend that you review the Standards Guidance, and if you are wondering how to conform to a provision of the [Code of Practices](#), consider adopting the suggested management approach. The Suggested Management Approach recommends one way for businesses to approach conformance with the standards. However you may adopt any management approach, appropriate to your own business and circumstances, to achieve the desired performance. For each standard the Suggested Management Approach usually contains the following elements:

- A risk assessment;
- A senior manager or officer being assigned responsibility;
- Written policies and procedures;
- Record keeping;
- Training.

Further details on the Suggested Management Approach can be found on Page 5 of the [Standards Guidance Manual](#)

What is a risk assessment?

Risk assessments involve a deliberate effort to identify things that can have a negative impact on your business, and what you are going to do to reduce the likelihood that they will happen, or to reduce the consequences if they do. They don't need to be very complicated. They can be carried out for the each of the standards in the Code of Practices, as outlined in the Standards Guidance document. Like other aspects to the suggested management approaches, risk assessments are not necessarily required for implementation, but they would assist in strengthening management systems and helping the auditing process.

You don't have to document all risk assessments, the key is to be able to demonstrate that you have this process in place. You may, however, want to document a risk assessment for those specific standards that are of greatest relevance and greatest risk of non-compliance for your business. Many owners or managers will already know what these risks are and it can be a useful exercise to note these down, or discuss them with key staff.

The Standards Guidance provides an Appendix on Conducting a Risk Assessment. The example used is for conducting risk based assessments of Business Partners (e.g. contractors, suppliers and/or joint venture partners). This can be found on Page 112 of the Standards Guidance along with a template. The suggested approach is not mandatory and is offered as a guide which can be modified to suit your own purposes. You may already have a more suitable method for conducting risk based assessments in place.

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## How should I provide the evidence and answers to the questions?

The RJC Assessment Workbook is the document that you need to complete for the Self Assessment. The RJC Assessment Workbook provides you with the [Assessment Questions](#) laid out in an Excel spreadsheet, with additional guidance on Objective Evidence. The Assessment Workbook has been provided in both Excel 2003 and 2007 Versions.

The workbook has macros, which when used, removes those provisions and associated questions not applicable for the Member Forum.

- You can download the document from our website: <http://www.responsiblejewellery.com/quick-downloads/rjc-certification-system-documents/>
- Once downloaded the document will open and you can save it on your computer
- When you open the document please enable macros
- Select your relevant sectors of business on the contact details tab
- On the assessment questions tab select "List Relevant Requirements Only". This will then remove any non-applicable questions.

The FAQ on RJC Member Certification – First Step, Self Assessment provides more information on this process.

## What sort of evidence do I need to provide?

Many of the questions that will need to be answered during Self Assessments and Verification Assessments (Audits) have to do with whether systems are in place. The sorts of questions you should consider when looking for evidence to confirm that you have systems in place are:

- Is there a policy or procedure?
- Who is responsible for it?
- Are people aware of it?
- Is it being followed?

The answers to these questions form the basis of your management systems. Examples of objective evidence include:

- Policies
- Invoices
- Employment and training records, including job descriptions & contracts
- Regulatory filings, internal reports
- Descriptions of IT systems, functions, controls
- Interviews with managers and staff
- Demonstration of work procedures
- Observation of activities and conditions

Assemble the evidence in a way that it is accessible and organised for the Auditor, as this helps to increase the efficiency of the Audit. The Auditor may ask for additional information and may interview staff.

For Smaller Businesses, Auditors will seek evidence of management systems and performance rather than overly complex procedures and records. For example, Auditors may rely more on interviews and demonstrations of how things are actually done, rather than looking for records and documents. Nevertheless, smaller businesses that lack much documentation will probably find it to their advantage to look for improvements. In other words, lack of documentation is not necessarily a problem, and can be addressed through other types of evidence, but the efficiency of the audit will be improved, and the likelihood of non-conformances will probably be reduced, if documented evidence is available.

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Lots of these questions are not applicable to my business?

A performance rating could be that the provision is 'Not Applicable'. This rating can be used when a requirement of the Code of Practices is not applicable to the Member based on the nature, scale and impacts of its business activities, product and/or services. However, low risk doesn't mean that evidence isn't needed, but may tend to mean that evidence is more obvious and easier to identify. A credible and verifiable explanation must be included in Assessments to justify a 'Not Applicable' status and we recommend that this be used with caution and only when the reasons are transparent and obvious.

For example, Hazardous Substances could be considered not to be relevant to a retailer or office environment; therefore there could be a temptation to rate it as non applicable. This would not be correct, as Hazardous Substances can be found in any workplace including office environments. Batteries, cleaning products and printer toners are all hazardous substances and must be handled & stored appropriately.

On the other hand, for a gold refiner, questions about the Kimberley Process would be not applicable. Remember that the assessment workbook will automatically remove any non applicable questions such as the Kimberley Process questions for a gold refiner.

We don't run training courses for our employees, do we need to?

Training doesn't necessarily mean taking courses, more often it involves learning one on one with managers and co-workers.

Lack of adequate training can present risks and weaknesses. So it is important for owners / managers to be knowledgeable, and to make a commitment to training. With those conditions in place, implementing training is quite straightforward and can be done informally, in the workplace. For example you might decide to run fortnightly team meetings and at each meeting you give an update on relevant issues such as product integrity or health and safety.

All of an RJC Members employees are welcome to attend RJC Online Training and if you would like to run tailored training sessions for your team please contact: [training@responsiblejewellery.com](mailto:training@responsiblejewellery.com)

Do I need to have my annual financial accounts audited?

The Code requires Members to maintain financial accounts where required by Applicable Law and in accordance with national or international accounting standards. The Code also requires that these accounts are independently certified and/or audited by a properly qualified auditor, and that the selection process appoints an auditor that is free of any bias or influence. For smaller organisations, having the accounts reviewed by an accountant that has no direct association with the Member (i.e. part owner or an investor, or even a relative) may suffice, although financial accounts need to comply with the Applicable Law and appropriate accounting standards. Members should be able to demonstrate what accounting standards were used to prepare and issue the accounts.

How do I engage with an Auditor?

Please also refer to the FAQ on RJC Member Certification – Verification Assessment. The list of RJC Accredited Auditors is available on our website: <http://www.responsiblejewellery.com/auditors/accredited-auditors/>

The Member selects an Auditor from our list of Accredited Auditors to conduct their Verification Assessment (Audit). We recommend that you contact all of the Auditors that are available to audit in your geographically location. This will ensure you negotiate the best option for your business. Please note that the initial main contact on the website may not be in your area of business however they will work with you to provide a local auditor for you.

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## How do I write a Policy and do I need one for every question?

Written policies and procedures can clarify the business' position on key issues, and identify ways to put that position into practice. It is useful to have policies written down, so as to keep a formal record and to provide consistent information to employees. It will also be very useful for auditors. Written policies don't need to be onerous or complicated and it may not be necessary or appropriate to have a policy on each and every standard of the Code of Practices.

However, a written policy should be in place to comply with the provision requiring that members support the Code. A simple template is provided in Appendix 2 of the Standards Guidance document, it says "We commit to operating our business according to the RJC Principles and Code of Practices"

For more information on writing a policy please refer to the FAQ on Developing a Policy  
<http://www.responsiblejewellery.com/about-us/frequently-asked-questions/>

## How do we manage Health & Safety?

Examples of hazards include slips and trips, workstation ergonomics, and basic hygiene. More specifically, there are risks from occupational overuse problems such as repetitive strain or eye strain from the handling of product.

The Code requires Members to provide safe and healthy working conditions for all employees in accordance with Applicable Law. The aim of health and safety provisions is to prevent accidents and injury to personal wellbeing occurring in the course of work. This is done by minimising, as far as is reasonably practicable, the causes of hazards inherent in the working environment. General workplace risks apply to all parts of the supply chain, including office environments. The RJC Code of Practices contains extensive requirements on health and safety relating to the working environment, management systems, hazardous substances, potential health hazards from the business' diamond and/or gold jewellery products, fire safety, first aid and sanitation and hygiene.

Consider the following:

- Are you aware of the applicable law and any industry standards that are relevant to your business?
- Ensure that each of the conditions for a safe and healthy workplace that are specified in the Code are in place.
- Does your workplace meet local building and occupational health & safety regulations and have an appropriate standard of hygiene.
- Is there a process in place for employees to discuss, review and manage health and safety issues?
- Do you have appropriate fire safety devices and unblocked emergency exits. Do employees know how to use these and are fire drills completed?
- Are employees trained in the relevant health & safety procedures, emergency procedures and first aid?
- Do you have the necessary health & safety equipment and do employees know how to use this?
- How do you keep employees informed of any changes to Health & Safety?
- Do you have a Health & Safety register to document & monitor any hazards?

For further information we recommend attending the Code of Practices Training Module, more details on Training can be found here: <http://www.responsiblejewellery.com/certification/training/>

## What is a Grievance Procedure?

Workplace Discipline is a means to correct or improve job-related behaviour or performance. Grievance procedures are a means for employees to raise concerns about management practices or decisions and have these investigated and resolved.

You should ensure that you are aware of and follow the local legal requirements in the countries where you operate. You should provide clear grievance procedures for your employees. Consider the following questions when reviewing your

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procedures:

- Is it clear to all employees who they should talk to if they wish to raise a grievance?
- Any Employee grievance records and maintained
- Disciplinary processes and standards are communicated to and apply equally to all management and staff

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How do we monitor our use of Natural resources?

The Energy use and natural resources section of the Code of Practices is applicable to all Facilities. Natural resources includes, but is not limited to, water and energy.

The Code requires Members to:

- Seek to ensure the efficiency of their business operations in terms of consumption of natural resources
- Seek to identify and implement practices that reduce use of fossil fuels and associated greenhouse gas emissions from transportation (where transportation is a significant business impact).

Ensure that you monitor your energy and resource consumption and have initiatives in place that aim to reduce usage.

For example:

- Is there a policy in place that requires that the lighting is turned off at the end of the day?
- Are computers turned off when the work day is completed?
- Do you recycle any waste such as cardboard, paper or organics?
- Do you monitor your water usage?

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