



# Approval and Oversight for Monitoring Firms

Version: 1.0  
Updated: 05.24.2023  
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## **1 PURPOSE AND SCOPE**

1.1 This document specifies the processes for the approval and oversight of monitoring firms and verification staff including the competency and training requirements for conducting GAPC Connections (GAPC) Monitoring Activities and the verification mechanism to assess whether the requirements are fulfilled.

1.2 The purpose of this document is to ensure the integrity and transparency of the GAPC monitoring firm and monitoring firm verification staff approval process.

## **2 ELIGIBILITY CRITERIA FOR FIRM**

2.1 Monitoring activities can only be performed by monitoring firms that have been approved by GAPC and that execute a License and Auditor Participation Agreement with GAPC. GAPC reserves the right to make changes to the approval process and criteria provided that reasonable notice is given as outlined in the License and Auditor Participation Agreement.

2.2 To be considered for approval by the GAPC Board of Directors the Monitoring Firm must:

- Submit a proposal to GAPC in response to the current year's Request for Proposal (RFP) by given deadline.
- Be accredited or comply with ISO 17065 or be members of APSCA. Exceptions to these criteria would require review and approval of the GAPC Board of Directors.
- Require each verification staff conducting GAPC Monitoring Visits agree to Code of Conduct for Approved Verification Staff (Appendix A) and to follow the GAPC Monitoring Protocols.
- Require each Verification Staff conducting GAPC Monitoring Visits to attend annual GAPC Verification Staff Training.
- Be able to ensure that all remediation will be completed by the monitoring firm, which includes but is not limited to scheduling, knowledge of what is to be remediated, and completion of the visit or document review in a reasonable timeframe specified by GAPC (30 days from the date the monitoring visit report was submitted). Monitoring Firms will be required to have a designated individual whose sole role is to manage remediation if the firm has more than 250 monitoring visits.
- Be able to ensure that all monitoring activities will be completed by October 1st of the current year.

2.3 Once approved, the monitoring firm shall inform GAPC of any changes to its organization that may affect performance.

### **3 ELGIBILITY CRITERIA FOR VERIFICATION STAFF**

3.1 All Verification Staff conducting or reviewing Monitoring Verification Visits must:

- Have familiarity with commercial U.S. agricultural practices. Familiarity with tobacco and/or hemp production is very desirable.
- Be bilingual in Spanish or have an in-person translator available when conducting worker interviews.
- Have experience as auditor/assessor of agricultural and labor practices, preferably in the United States.
- Be at least eighteen (18) years of age or older.
- Attend in-person training to take place in Knoxville, Tennessee at GAPC offices. The training will consist of three days of classroom training discussing the monitoring tool, monitoring visit scenarios, GAPC monitoring visit protocols, and utilizing the scheduling tool. Trainers and materials will be provided by GAPC. All other arrangements and cost of in-person training will be at the expense of the monitoring firm.
- Have an iPad or other similar tablet (use of cell phone to conduct visit is not permitted) with iOS operating systems to conduct monitoring visits.
- Have a hot-spot or access to internet nightly while conducting monitoring visits.
- Strictly adhere to GAPC Monitoring protocols, policies, processes, and procedures provided by GAPC. If there are Verification Staff who do not follow protocol, GAPC will notify the individual and monitoring firm and the individual(s) will proceed through the GAPC Review and Dismissal Policy.
- Use the GAPC scheduling tool to indicate contact date and monitoring visit date. The tool will also be used to store comments surrounding the scheduling of visits to indicate if there are any issues reaching the grower or with the visit itself. GAPC will require strict use of this tool. If Verification Staff do not use the schedule tool, they will proceed through the GAPC Review and Dismissal Policy.

3.2 Before conducting GAPC Monitoring Visits all Verification Staff must:

- Agree and sign GAPC's Verification Staff Code of Conduct (Appendix A). Violations of the Verification Staff Code of Conduct will cause the individual to proceed through the GAPC Review and Dismissal Policy.

- Agree to follow GAPC’s confidentiality agreement and maintain any and all documents containing personal or financial information of growers or employees confidential.

## 4 APPROVAL PROCESS

4.1 **Request for Proposal (RFP):** All monitoring firms are required to submit a proposal to GAPC’s request for proposal (RFP) that is posted on the GAPC website ([www.gapconnections.com](http://www.gapconnections.com)). Their proposal must include:

- A description of their experience in developing, administering, and facilitating on-farm and/or Good Agricultural Practices assessments and Certification Programs.
- Examples of GAP assessments or GAPC Monitoring Visits conducted by or with their organization.
- Testimonials or references from past clients.
- Anticipated resources that will be assigned to this project (total number, role, title, experience of individuals).
- Project management methodology.
- List of verification staff that will be conducting monitoring visits on behalf of GAPC, along with their resume/experience.
- Customer service aspects that the monitoring firm offers such as advance scheduling and pre-visit reminders or calls to prepare.
- Maximum pricing for monitoring activities
- How invoicing will be handled and if the “paid” feature on the schedule tool will be utilized

4.2 **Review of Proposals:** After the proposals and all required documentation have been submitted, they will be reviewed by the GAPC Certification and Assessment Director. The information will be presented to the GAPC Board of Directors, and the Board will vote to select a list of approved monitoring firms.

4.2.1 GAPC will evaluate all proposals based on the following criteria:

- *Overall proposal suitability:* Proposed solution(s) must meet the scope and needs included herein and be presented in a clear and organized manner.
- *Organizational Experience:* Bidders will be evaluated on their experience and the experience of their verification staff as it pertains to the scope of this project.

- *Previous work:* Bidders will be evaluated on examples of their work pertaining to certification and remediation programs as well as client testimonials and references. In addition, any previous work done for GAPC and the customer service provided will also be taken into consideration.
- *Value and cost:* Bidders will be evaluated on the cost of their solution(s) based on the work to be performed in accordance with the scope of this project.
- *Technical expertise and experience:* Bidders must provide descriptions and documentation of staff technical expertise and experience.

4.3 **Notification of Selection:** After Board selection, GAPC will notify the monitoring firms of their approval via email. The License and Auditor Participation Agreement will be sent with the notification and must be signed and returned within 15 calendar days.

4.4 **Approval:** Receipt of the signed License and Auditor Participation Agreement will warrant the monitoring firm approval, and the monitoring firm will be listed on the Approved Monitoring Firm list.

## 5 IMPARTIALITY AND CONFLICTS OF INTEREST

5.1 All monitoring firms shall submit their conflict-of-interest policy for their verification staff.

5.2 All Monitoring Firms and Verification Staff will be required to review and sign the Code of Conduct for GAPC Approved Verification Staff, and to uphold the integrity and ethical standards of the GAPC Monitoring program(s) and GAPC.

5.3 Verification Staff may not visit the same operation more than two years consecutively to ensure impartiality.

## 6 OVERSIGHT OF PERFORMANCE

6.1 All monitoring activities shall be performed by Verification Staff who have auditing experience, have attended GAPC Verification Staff training, and have reviewed and signed the Verification Staff Code of Conduct.

- 6.2 Oversight of each Verification Staff's and Monitoring Firm's performance will be conducted by GAPC using all the following methods:
- a. Administrative review of each monitoring report submitted,
  - b. Utilization of an GAPC Verification Staff Scorecard (tracking errors and corrections),
  - c. Review of the GAPC Schedule Tool (verifying proper use and scheduling),
  - d. Shadow visits to monitor a verification staff's and monitoring firm's performance during a monitoring visit, and
  - e. The GAPC's Review and Dismissal Policy for Approved Verification Staff (Section 8).

## **7 REVIEW OF MONITORING FIRM REPORTS**

7.1 All monitoring firm reports shall be reviewed by GAPC, and feedback sent to the Verification Staff who completed the report.

7.2 Review of monitoring reports by GAPC will include:

- a. Completeness of monitoring visit,
- b. Accuracy of information collected from monitoring visit,
- c. Timeliness of report submission,
- d. Proper utilization of Auditor Schedule Tool, and
- e. Worker interview completion and follow up.

7.3 As a result of monitoring report reviews, GAPC may request additional documentation, clarification, corrections, or follow up visits be made to obtain a complete monitoring report.

7.4 If non-compliance is identified during review, the feedback will be shared with the monitoring firm and Verification Staff member who conducted the visit, and a corrective action plan will be required. Repeat non-compliance is grounds for removal as outlined in our Review and Dismissal Policy.

## **8 VERIFICATION STAFF SCORECARD**

8.1 The Verification Staff Scorecard is provided to provide feedback to verification staff and monitoring firms on performance. The scorecard will contain errors made and summary statistics to provide a "score" for each individual verification staff conducting GAPC Monitoring Visits.

8.2 Each verification staff conducting GAPC Monitoring Visits shall review their Verification Staff Scorecard often to assess their performance and to address any reported errors.

## **9 SHADOW VISITS**

9.1 Shadow visits may be conducted at any time during the GAPC Monitoring Visit season and may be performed by GAPC staff or a Monitoring Firm Supervisor. Shadow visits are intended to provide transparency and consistency of the monitoring process and to review monitoring firm verification staff's competence and compliance with protocols, policies, and procedures.

## **10 GAPC REVIEW AND DISMISSAL POLICY FOR VERIFICATION STAFF**

10.1 Verification Staff who do not comply with and follow the Code of Conduct or monitoring protocols, policies or processes will be addressed in the following manner:

10.1.1 First notice: Verification Staff member is issued a written notification detailing violations and non-compliance. Monitoring firm will be required to provide Corrective Action Plan (CAP) within five business days of notification outlining violation and how it will be corrected in the future.

10.1.2 Second notice: Verification Staff member is placed on probation and is issued a final written warning detailing violations and non-compliance that states any further violations or non-compliance will result in the Verification Staff member being removed from the approved list of GAPC Verification Staff. A meeting/conference will be scheduled with GAPC staff, the Verification Staff member, and monitoring firm supervisor if needed. Monitoring firm will be required to provide Corrective Action Plan (CAP) within three business days of notification outlining violation and how it will be corrected in the future.

10.1.3 Third notice: Verification Staff member will be reviewed by the Monitoring Advisory Committee. The Verification Staff member, monitoring firm supervisor, GAPC staff, and Monitoring Advisory Committee will meet and discuss violations. Committee will discuss and decide on the removal of the auditor from GAPC approved auditor list.



## 11 CONDITIONS FOR REMOVAL OF APPROVED MONITORING FIRM

11.1 A monitoring firm's approval status may be revoked by GAPC if the monitoring firm:

- a. No longer meets the criteria for initial approval; or
- b. Fails to fulfil the contractual obligations as stated in the License and Auditor Participation Agreement between GAPC and the monitoring firm; or
- c. Misuses the GAPC logos, approved claims, or trademarks.

## 12 REFERENCES TO OTHER DOCUMENTS OR POLICIES

- 12.1 Request for Proposal (RFP)
- 12.2 GAPC Certification Monitoring Protocols and Policies
- 12.3 GAPC Certification Monitoring Process and Procedures
- 12.4 Auditor Code of Conduct (Appendix A)

## 13 GLOSSARY OF TERMS

**Approval:** Official permission and recognition by the GAPC Board of the competency and qualifications of a monitoring firm and verification staff to perform monitoring activities including Monitoring Visits.

**Audit:** Initial monitoring activity in the GAPC Monitoring cycle, conducted on-farm. Includes all Critical and Additional GAPC Certification Standards, and worker interviews if the operation hires labor.

**Audit Scheduling Tool:** Tool located on the GAPC website where Verification Staff , company members, and GAPC staff can access grower scheduling information. Scheduling Tool is updated by monitoring firms daily and utilization is a requirement for approved monitoring staff.

**Monitoring Activities:** Documented process which occurs annually can include but is not limited to an audit or site visit.

**Monitoring Firm:** Formal, third party who has been approved to identify Verification Staff to perform GAPC monitoring activities.

**Shadow Visit:** Visits conducted with Verification Staff to gauge performance and preparedness. Shadow visits may be conducted by GAPC staff or monitoring firm supervisor.

**Site Visit:** Second monitoring activity in the GAPC Tobacco Monitoring cycle, conducted on-farm. Includes all Critical GAPC Tobacco Certification Standards. Worker interviews required if the operation hires labor indirectly.

**Verification Staff:** Personnel identified to perform monitoring activities.

**Verification Staff Scorecard:** Report located on the GAPC website to track and document errors on reports.

## **APPENDIX A**

### **Code of Conduct for GAP Connections Approved Verification Staff**

**Our goal is a fair, consistent, and honest verification  
of compliance with GAPC Certification Standards.**

#### **Integrity**

The integrity of verification staff establishes trust and provides the basis for reliance on verification staff member's judgment. As an approved verification staff member, I pledge to:

- Perform my monitoring activity assignments with honesty, accuracy, fairness, and discretion.
- Not engage in activities that might discredit the audit program or GAP Connections.
- Report monitoring activity results truthfully and disclose any unresolved diverging opinions.
- Act in a professional and courteous manner, even under adverse monitoring activity conditions.

#### **Objectivity**

Verification Staff must be objective in gathering, evaluating, and communicating information about the practices and activities being examined. Verification Staff must make a balanced and impartial assessment of all the relevant facts and not be unduly influenced by their interests, or those of others, in making judgments. As an approved verification staff member, I pledge to:

- Disclose any activity or relationship that may affect my unbiased assessment.
- Not accept anything that may impair, or appear to impair, my judgment.
- Include all the material facts to avoid any distortion of my monitoring activity report.

#### **Confidentiality**

Verification Staff must respect the value and ownership of the information they receive and not disclose it without the appropriate authority, unless obligated for legal or professional reasons.

As an approved verification staff member, I pledge to:

- Limit the sampled records to those needed to assess activities and practices within the monitoring activity scope.

- Exercise discretion in the use and protection of the information acquired during my monitoring activity duties.
- Not use the information for personal gain or in any way detrimental to the organization.

## **Competence**

Verification staff must apply their knowledge, skills, and experience in the performance of their assessment duties. As an approved verification staff member, I pledge to:

- Perform monitoring activities in accordance with the procedures and practices provided by GAP Connections.
- Attend annual training with GAP Connections to continually improve my proficiency and the quality of my monitoring activity services.
- Prepare well for my monitoring activity assignments and report findings using verifiable evidence.

## **Violations of Code of Conduct or Monitoring Protocols**

Verification Staff who do not comply with and follow the Code of Conduct or Monitoring Protocols will be addressed in the following manner:

1. First notice: Verification staff member is issued a written notification detailing violations and non-compliance. Monitoring firm will be required to provide Corrective Action Plan (CAP) within five business days of notification outlining violation and how it will be corrected in the future.
2. Second notice: Verification staff member is placed on probation and is issued a final written warning detailing violations and non-compliance that states any further violations or non-compliance will result in the verification staff member being removed from the approved list of GAPC Verification Staff. A meeting/conference will be scheduled with GAPC staff, the verification staff member, and monitoring firm supervisor if needed. Monitoring firm will be required to provide Corrective Action Plan (CAP) within three business days of notification outlining violation and how it will be corrected in the future.
3. Third notice: Verification Staff will be reviewed by the Monitoring Advisory Committee. The verification staff member, monitoring firm supervisor, GAPC staff, and Monitoring Advisory Committee will meet and discuss violations. Committee will discuss and decide on the removal of the verification staff member from GAPC approved Verification Staff list.

## Agreement and Signature

I agree to act in accordance with this Code of Conduct to uphold the integrity and the ethical standards of the GAP Connections Program(s) and GAP Connections. I agree to comply with the Terms and Conditions outlined in this contract. I also understand that a violation of this Code of Conduct or the GAPC Monitoring Protocols can result in GAP Connections removing my approved status.

Signed by: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

*\*Disclosure: The parties agree that nothing in this Code of Conduct shall be interpreted as creating or establishing an employment relationship, partnership or joint venture between GAP Connections and any verification staff member. The parties agree that GAP Connections has no supervisory authority over the time, manner and methods of services provided by Verification Staff or Verification Staff Member's employer or any other party with whom Verification Staff contracts. Nothing in this Code of Conduct shall be interpreted to be contrary to that agreement.*