SRP Assurance Oversight Program Manual

Title:	SRP Assurance Oversight Program
Document number:	NO-050225–ED-EN-079
Scope:	Global
Approval date:	February 2025

About the Sustainable Rice Platform (SRP)

The Sustainable Rice Platform e.V. (SRP) is a global multi-stakeholder alliance comprising over 100 institutional members from public, private, research, civil society and the financial sector. Co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and private sector partners, SRP works with its members and partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production, and by offering the global rice market an assured supply of sustainably produced rice.

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1. Introduction

1.1. The Assurance Oversight Program (AOP) is a systematic framework designed to ensure that SRP's assurance processes and activities adhere to established best practices and regulatory requirements. This program defines processes for continuous monitoring, auditing, and evaluation of operations to identify potential risks, non-compliance issues, areas for improvement as well as sanctions for violations.

1.2. The AOP includes the following activities to monitor and evaluate the performance of approved Conformity Assessment Bodies (CABs):

1. **Monitoring of Quality Management System (QMS):** continuous checking of CAB performance through the SRP Audit Management Platform, CAB responses and data updates, as well as communication to Verified Units.

2. **Witness audit**: this verification audit conducted by CAB is observed by a party independent of the CAB to assess the quality and integrity of its audit.

3. **Compliance audit**: this audit is conducted by an independent party to assess the quality of a previous audit carried out by the CAB, to ensure the CAB's audit meets the required standards.

1.3. The result of integrity findings will be reported to the SRP Executive Director and SRP Board to enable oversight and for use as a reference to support continuous improvement.

2. Objective

2.1. The SRP Assurance Oversight Program is designed to ensure and verify that SRP assurance program processes, systems, and activities are guided by the principles of the ISEAL Code of Good Practices for Sustainability System and comply with all requirements stipulated in SRP's own normative documents. Specifically, the program aims to:

1. **Ensure Compliance**: Verify that SRP-approved CABs adhere to applicable laws, regulations, policies, and the requirements of the SRP Assurance Scheme, thereby minimizing legal and regulatory risks.

2. **Identify and Mitigate Risks**: Continuously monitor and assess operations to identify potential risks and vulnerabilities and implement measures to mitigate them effectively.

3. **Enhance Accountability**: Promote a culture of responsibility and accountability by clearly defining roles, responsibilities and expectations for compliance and performance.

4. **Foster Continuous Improvement**: Provide a mechanism for ongoing assessment and feedback, encouraging continuous improvement in quality, safety, and effectiveness.

5. **Support Informed Decision-Making**: Generate reliable data and insights that support evidence-based decision-making and strategic planning.

6. **Maintain Stakeholder Trust**: Demonstrate commitment to high standards and ethical practices, thereby maintaining the trust and confidence of stakeholders, including SRP members, regulators, and stakeholders.

3. Roles and responsibilities

3.1. Key actors and their roles in delivering the SRP assurance oversight program are introduced below:

- **SRP Secretariat**: responsible for upholding the integrity and effectiveness of the verification process by developing and managing the Assurance Oversight Program and reporting directly to the SRP Board. Currently, the oversight program is conducted in-house, but it is subject to annual review to determine if it is necessary to engage a third-party accreditation body to conduct oversight audits.

- **Oversight Auditor (OA):** responsible for monitoring CAB compliance with the requirements of the SRP Assurance Scheme and ISO 17065 through oversight audits as outlined in section 1.2 above. The OA plans and prepares audits, reviews documentation, assesses auditor competence, and identifies non-conformities. The OA is also responsible for providing feedback, monitoring corrective actions, and reporting findings while maintaining confidentiality and an impartial perspective.

- **Conformity Assessment Body (CAB):** responsible for ensuring compliance with the SRP Assurance Scheme and ISO 17065, ensuring fair and impartial conduct of all audits and protecting confidential client/SRP data. CABs develop and implement verification processes, conduct internal audits and manage documentation to demonstrate adherence to all requirements of the SRP Assurance Scheme. CABs assess and qualify auditors, address non-conformities and implement corrective actions. They also provide transparent reporting to stakeholders, engage in continuous improvement practices and ensure that all verification activities are fair and objective, and conducted competently and consistently.

4. Scope

4.1. The SRP Assurance Oversight Program monitors the performance of the CABs.

4.2. The findings of oversight activities will be presented to CABs for improvement. Where gaps are identified, the CAB shall conduct a root cause analysis and develop a corrective action plan within 28 calendar days of receiving the results. A checklist is provided for each activity:

1. Monitoring of the Quality Management System (QMS) utilizes a set of Key Performance Indicators (KPIs) to review CAB performance. These KPIs ensure compliance, effectiveness, and provide a basis for continuous improvement. The key elements are listed below:
   a. Compliance and quality assurance
   b. Audit performance and data management
   c. Client relations and communication
   d. Auditor qualification and capacity building

    e.   Integrity and independence

2. Witness audits also utilize KPIs to assess compliance of CAB auditor performance with SRP normative documents, verify auditing techniques and procedures, evaluate auditor competence and ensure consistency of audits across different contexts. Witness audits also verify the conduct of the verification audit itself across four areas:
    a.   Audit preparation
    b.   Execution
    c.   Reporting
    d.   Follow-up

3. Compliance audits are based on the SRP Standard for Sustainable Rice Cultivation (producer level) or the SRP Chain of Custody Standard (Participating Operator level). The same checklist is used by the oversight auditor for this activity.

SRP reserves the right to manage the SRP oversight program directly, or delegate a third-party organization to facilitate, in whole or in part.

5. Assurance oversight process

5.1.   Monitoring of the **Quality Management System (QMS)** will be conducted annually, with a desktop assessment scheduled in Q1 the following year. This timing ensures that the process comprehensively covers CAB activities throughout the year. While performance review and monitoring of CAB performance takes place throughout the year, the detailed desktop assessment in Q1 provides a thorough evaluation and summary of the year's activities.

5.2.   QMS monitoring is complemented by additional activities including field visits (e.g. witness audits and/or compliance audits). These activities are critical for verifying on-the-ground adherence to SRP normative documents. The process begins with a comprehensive risk analysis, allowing the sampling size and process to focus on areas of higher risk and impact. Specific criteria for sample selection ensure a fair, representative and effective assessment. These criteria may include the following:

1. Past performance of the CAB

2. Number of clients that the CAB manages

3. Geographical diversity

4. Significance of activities under audit

5. High transaction volume

6. Any specific concerns raised by stakeholders.

Based on the findings of the current year's QMS monitoring, the SRP Secretariat will develop an oversight plan for the following year. This plan will include methodologies, resources, and timelines, with the frequency of oversight tailored to the performance and risk level of each CAB. This approach ensures a continuous and iterative process for ongoing improvement.

5.3. The process of conducting witness and compliance audits involves fieldwork to review documentation, observe processes in the field, and interview personnel, and utilizes both manual and automated tools to gather and analyze data. Auditing and subsequent reporting activities are scheduled in advance with the CAB Scheme Manager.

5.4. The **Witness Audit** employs a dedicated report template detailing the entire audit process. This template covers audit objectives, scope, indicators, scoring method, and auditor's findings, ensuring clear and structured presentation. Upon completion, this witness audit report will be shared with the CAB for feedback, ensuring an inclusive and transparent review process. The CAB's feedback will be recorded, and the final report may be amended following the CAB's clarification.

5.5. The **Compliance Audit** is conducted to assess the quality and integrity of the preceding audit carried out by the CAB. This audit identifies any discrepancies or gaps between the CAB's audit and the audit conducted through the oversight program. By comparing the respective findings, this process assesses the adherence of the CAB's audit to SRP standards and methodologies, and highlights areas for improvement of audit processes. This contributes to consistency and reliability in future audits. The results of the compliance audit are critical to provide actionable feedback to CABs and maintain the credibility of the SRP Assurance Scheme.

5.6. Finally, the findings from all AOP activities are compiled into a comprehensive report, highlighting significant issues, their potential impacts and recommended corrective actions. This report is presented to the CAB at the beginning of the following year.

5.7. Upon receiving results that indicate areas requiring improvement, the CAB should conduct a root cause analysis and develop a corrective action plan in accordance with the Guidelines for Identifying Root Cause Analysis and Developing Corrective Action Plan. The corrective action plan must be submitted to the SRP Secretariat within 28 calendar days of receiving the results.

5.8. Follow-up activities are essential to track implementation of recommended corrective actions, conduct follow-up reviews to confirm resolution of issues and improvements sustained, and to update the risk analysis and oversight plan based on the results of these reviews.

6. Documentation and record keeping

6.1. All actions and decisions under the AOP must be fully documented and available for review or audit, contributing to building trust and credibility in the verification process. Proper record-keeping practices support transparency and effective communication among stakeholders while ensuring that all parties have access to accurate and up-to-date information. Systematic organization and retention of oversight program records enable monitoring of progress in implementing corrective actions and measure improvements over time.

6.2. Comprehensive OAP documentation also enables the Secretariat to identify trends, recurring issues, and opportunities for systemic improvements, thus enhancing the overall effectiveness and reliability of the certification process.

6.3. Proper documentation requires maintaining supporting documentation such as checklists, evidence gathered during audits, and correspondence related to oversight activities. This includes audit checklists used during evaluations, records of interviews conducted, photographs, and any other relevant evidence that supports the audit findings. Maintaining this supplementary documentation is essential for substantiating audit reports and corrective actions.

6.4. All AOP records must be systematically organized and preserved to facilitate retrieval and review, and shall be retained in SRP's SharePoint folder for a minimum of 5 years.

6.5. The SRP Secretariat shall ensure documentary evidence generated by the AOP is available to demonstrate compliance of the SRP Assurance Scheme with the ISEAL Code of Good Practice and ISO 17065.

7. Sanctions

7.1. A robust and proportionate sanctions process is essential to incentivize CABs to maintain high standards of compliance and integrity and safeguard the credibility of the verification process.

7.2. SRP reserves the right to impose a range of actions depending on the nature, severity and persistence of CAB non-compliances identified. Sanctions might be imposed at the sole discretion of SRP. However, SRP will observe the principle of proportionality and ensure that sanctions do not go beyond what is necessary to uphold the compliance, integrity, credibility and reputation of the SRP. When imposing sanctions, SRP will bear in mind all relevant circumstances of the individual case, and in particular – but not limited to – the gravity of the non-compliance, the degree of culpability of the CAB, a possible repeat offense, the manner in which CAB has taken corrective action, and/or the overall risk that the non-compliance poses to the compliance, integrity, credibility and reputation of the SRP.

7.3. The sanction(s) to be imposed will depend largely on the gravity of the non-compliance identified, differentiating clearly between minor and major non-compliances:

1. **Minor non-compliance** refers to an issue that has minimal impact on the integrity or reliability of the SRP verification process. Such issues are isolated or infrequent occurrences that can be promptly addressed through corrective actions, ensuring continuous improvement while maintaining the credibility of the verification process. These issues typically require minimal time and effort to resolve without significant consequences.

2. **Major non-compliance** refers to an issue that may be deemed to potentially undermine the credibility, reliability, or impartiality of the verification process. Such issues are typically persistent, indicating failures and requiring extensive corrective actions or systemic change.

7.4. In principle, SRP can impose the following sanctions, while SRP remains free to impose a combination of various sanctions and/or other types of sanctions that might be better suited to tackle an identified non-conformity.

1. **Warning**. Generally issued for minor non-compliances and minor level of CAB's culpability. A warning formally notifies the CAB of the identified issue and stipulates a timeline for rectification.

2. **Increased oversight**. Whenever SRP considers that identified non-conformities – irrespective of their gravity – result from systemic/structural/organizational shortcomings, the CAB may be required to submit to more stringent oversight measures such as more frequent compliance and/or witness audits to identify underlying issues and support implementation of corrective actions to prevent future non-compliances and contribute to continuous improvement.

3. **Suspension**. In case the gravity of the non-conformity and/or the level of CAB's culpability are capable of undermining the compliance, integrity, credibility or reputation of the SRP, the CAB's authorization or ability to issue verifications may be temporarily suspended until the CAB proves within six (6) months following the suspension decision that it has taken adequate corrective action. SRP may grant an extension of the six months period upon reasoned request by the CAB. Failure by the CAB to take adequate corrective action during this time-frame might lead to a revocation of the CABs authorization under the SRP Assurance Scheme and entitles SRP to terminate the agreement with the CAB for cause. During the suspension period, the CAB will be prohibited from conducting audits or issuing verifications, except for verifications already agreed upon or contracted.

4. **Revocation**. In case the gravity of the non-conformity and/or the level of CAB's culpability are capable of persistently undermining the trust between SRP and the CAB, the CAB's authorization under the SRP Assurance Scheme may be permanently revoked. Such revocation will generally only occur in case of deliberate or intentional non-conformities and/or fraudulent conduct by the CAB This sanction signifies that the CAB is no longer permitted to operate as an approved CAB within the SRP Assurance Scheme and loses its authority to conduct audits, issue verifications or use the SRP Organizational logo.

8. Training and capacity building

8.1. Oversight auditors must undergo mandatory and rigorous training, covering the principles and practices of auditing, SRP standards and Assurance Scheme, and basic knowledge of ISO 19011 (Guidelines for Auditing Management Systems) and ISO 17065 (Conformity Assessment System Development).

8.2. Training will be facilitated by the SRP Secretariat. As a minimum, oversight auditors shall undergo training with a minimum duration of 20 hours. This program includes modules that focus specifically on performing oversight audits:

- Basic knowledge of ISO 19011 and ISO 17065

- SRP Standard and Performance Indicators

- SRP Assurance Scheme v 2,0

- SRP Chain of Custody Policy and Standard

- SRP Internal Management System Standard

8.3. Continuous professional development is also essential. Auditors are required to participate in regular refresher courses and stay updated on the latest developments in auditing techniques and industry standards.

8.4. Other personnel or consultants contracted by the SRP Secretariat involved in the oversight process must also meet stringent competence requirements. This requires a thorough understanding of the SRP standards they are assessing, as well as the ability to implement and manage quality management systems. They should be trained in internal auditing practices, corrective and preventive action processes, and effective communication skills to ensure they can interact professionally and constructively with all stakeholders.

8.5. SRP commits to impartial, consistent and diligent processes for receiving and responding to comments, complaints, grievances, and appeals. SRP oversight auditors assigned to conduct oversight audits must sign an agreement affirming impartiality and confidentiality.

9. Response to integrity breaches

9.1. For complaints and grievances against the performance of Conformity Assessment Bodies or compliance of sites:

- o Stakeholders with complaints or grievances are obligated to first use the dispute mechanism established by the relevant Conformity Assessment Body.

- o If the complaint or grievance remains unresolved, SRP may, at its discretion, mediate on behalf of the complainant and decide to conduct an extraordinary investigative audit, whose outcome shall be final. The SRP Grievance and Dispute Resolution Policy applies.