



ENVIRONMENT • SAFETY • LIVELIHOODS

System Assurance Protocol

General Regulations Part 2- Requirements for Certification Bodies

Rev – 4

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1 **INTRODUCTION**

1. The Certification Bodies (CBs) are expected to meet the following requirements for empaneling with *trustea* Secretariat for carrying out the Verification process as per the *trustea* Code.
2. *trustea* Secretariat does not levy any fee for empaneling the Certification Bodies for the first time. However, they need to pay a fee to be prescribed by the *trustea* Secretariat for renewal of the empanelment whenever applicable.

2 **GENERAL REQUIREMENTS FOR CERTIFICATION BODIES**

1. The certification body shall be registered as a legal entity in India or shall be a defined part of a legal entity, such that it can be held legally responsible for all its verification activities. A governmental certification body is deemed to be a legal entity on the basis of its governmental status.
2. The certification body shall be accredited to ISO/IEC 17065 as a pre-qualification criterion. To operate under the *trustea* Scheme, the CBs will require to have a valid accreditation for ISO/IEC 17065 (Note – This is not a requirement and is used more as an eligibility criteria). The CB can also apply even if it does not have the accreditation; however, it has to clearly demonstrate that it is in the process of getting such accreditations and *trustea* verification audits cannot take place until after receipt of the accreditation.
3. The CB needs to provide adequate evidence of its involvement and competence in the agriculture sector along with the following documents:
 - a) Quality Manual for its Quality Management Systems
 - b) Organizational details including an organizational chart.
 - c) A List of auditors and technical experts qualified for the agriculture sector along with their academic qualifications, audit logs and auditor status (whether TL/TM)
 - d) CBs documented system for the ISO 17065 and *trustea* scheme.

3 **APPROVAL PROCEDURE FOR THE TRUSTEA CERTIFICATION BODY**

The *trustea* Secretariat goes through a rigorous process of approving CBs, ensuring that an acceptable quality audit of the clients takes place. Only approved CBs are allowed to conduct a *trustea* audit. This *trustea* accreditation will be managed by *trustea* Secretariat. In addition to pre-qualification criteria for CBs, an onboarding procedure is available which covers a review of agreement signing, application review, scheme procedure, auditor training records, auditor competence, audit protocol understanding etc. The approval process shall have an evaluation process consistent with that contained in this protocol.

3.1 **Application**

The CBs need to register through tCMS from the *trustea* website under IT Initiative to the *trustea* Secretariat stating the wish to be empaneled to perform *trustea* audits along with supporting documents as mentioned above. Once the CB is ready for audit

performance, the approved *trustea* member will witness the first two audits of that CB as a part of the monitoring and assessing competency. If the auditor is an approved *trustea* lead auditor from another CB under *trustea* and joins the new CB, then, this process can be omitted based on the situation and applicability.

3.2 Accreditation Agreement

1. On receipt of the required documents by the Secretariat, a review of the same is undertaken. If all requirements are met an agreement is sent to the CB. Once this Agreement is signed and returned to the *trustea* Secretariat, an approval certificate is issued. However, the CB can only start performing the *trustea* audits once the CB onboarding process is successfully completed as per *trustea* SOP and guidelines. The CB will then receive access to the *trustea* member portal (tCMS). The CB's name will also appear on the list of the approved certification bodies for *trustea* audits.
2. The Agreement establishes the rights and obligations of the *trustea* Secretariat and of the Certification Body (CB) as the neutral organization for verification inspection, and issuing Verification Certificates to the organisations complying with the *trustea* Code requirements.
3. The Agreement, including its updates, must be accepted and signed by the CB as part of the application procedure to become and to remain a *trustea* approved CB and to be listed as such on the *trustea* website.
4. The Agreement and the General Regulations and audit protocol complement each other and *trustea* approved CBs must continuously comply with all.

3.3 CB Coordinator

CB must appoint a representative for coordinating with the *trustea* Secretariat. The primary communication with the *trustea* Secretariat would be for the purpose of providing all *trustea* verification documents to the secretariat in accordance with the *trustea* audit protocol and to keep all *trustea*-related documentation up to date. This nominated representative shall be able to address all queries from the *trustea* Secretariat concerning issues relating to *trustea* verification audits.

3.4 Other obligations of the Certification Body approved under the Scheme

1. It shall commit to fulfill continually the requirements for approval set by *trustea*, for the scopes where approval is sought or granted.
2. It shall claim approval only with respect to the scope for which it has been granted empanelment.
3. It shall not use and permit the use of the *trustea* Mark in such a manner as to bring *trustea* into disrepute.
4. It shall inform the *trustea* secretariat without delay, of any significant changes relevant to its approval as a *trustea* Certification Body, in any aspect of its

status or operation relating to

- a) Its legal, commercial, ownership, or organizational status
- b) Significant changes in top management and key personnel dealing with *trustea* audits
- c) Change of address or contact information
- d) Any changes that may affect its ability to carry out its auditing obligations in a timely manner and to the quality standards specified in the *trustea* General Regulations, Parts 1 and 2.
- e) The CBs schedule of internal audits shall cover the *trustea* scheme (at least on an annual basis). The reports of the internal audit shall be presented to the *trustea*, if specifically asked for, or at least reviewed during the office assessments.

4 VERIFICATION AGREEMENT BETWEEN CB AND ITS CLIENTS

The Certification Body shall have a legally enforceable agreement for the provision of verification activities to its clients. Agreements for verification shall take into include, but not be limited to,

- a) The responsibilities of the parties.
- b) Description of services provided by the CB
- c) Confidentiality and protection of sensitive information
- d) Payments - The VO shall make payment of the contracted audit fees within 15 days from the date of the verification audit. If the delay in settlement of audit fees exceeds three months from the date of audit, the said verification audit shall become invalid and VC shall not be issued to VO.
- e) Contractual response times of both parties
- f) Termination
- g) Grievances and appeals

4.1. The CB shall in its contract with the client refer to the mutual rights and obligations under the *trustea* scheme as the basis of their agreement. The certification body shall ensure in their verification agreement that the client complies with the following:

- a) If the client provides copies of the verification certificate to others, the certificate shall be reproduced in its entirety
- b) In making reference to its tea produce verification in communication media such as documents, brochures, or advertising, complies with the requirements for the use of the *trustea* word mark and logo;
- c) The client shall inform the certification body, without delay, of matters that may affect the ability to conform to the verification requirements.
- d) It contains an appeals procedure for the client against CB decisions that is compliant

with section 5.5 of Part 1 of the General Regulations.

- e) The VO shall carry out an internal audit (1A) within the specified due date. Failure to carry out 1A and if the delay exceeds three months from the due date the VC shall be cancelled.
- f) SAA - The VC shall be subjected to SAA at any time during its validity period. Refusal on the part of VO to allow the SAA team for verification shall lead to cancellation of the VC.

5. RESPONSIBILITY FOR VERIFICATION DECISIONS

- 1. The Certification Body shall be the only authority to make a verification decision.
- 2. The Certification Body shall be responsible for and shall retain authority for its decisions relating to verification. This includes the granting, maintaining, re-verifying, and extending of verification.

6. IMPARTIALITY AND TRANSPARENCY

6.1 Management of impartiality by the certification body:

- 1. It shall have top management commitment to impartiality.
- 2. It shall make a publicly available statement that it understands the importance of impartiality in carrying out its verification activities, manages conflict of interests, and ensures the objectivity of its verification activities.
- 3. It shall identify risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, or from its relationships, or the relationships of its personnel. A relationship that threatens the impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing, and payment of a sales commission or other inducement for the referral of new clients, etc. However, such relationships do not necessarily present a body with a risk of impartiality.
- 4. It shall be able to demonstrate how it eliminates or minimizes risk to impartiality if identified.
- 5. When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of the certification body requesting verification from its parent or when the certification body belongs to a corporation or holding and other parts of it, that request verification to its related certification body), then verification shall not be provided.
- 6. It shall document how it manages its verification business and any other activities so as to eliminate actual conflict of interest and minimize any identified risk to impartiality. This information shall be made available to the mechanism specified in 2.7. The documentation shall cover all potential sources of conflict of interest that are identified,

whether they arise from within the certification body or from the activities of other persons, bodies, or organizations.

7. The certification body and any group within its control or personnel employed or contracted, in an organization within its control shall not offer or provide consultancy on the product that it verifies.
8. The certification body and any group within its control or personnel employed or contracted, in an organization within its control shall not offer or provide training on the aspects that it verifies.
9. The certification body is allowed to explain its findings and/or clarify the requirements of the normative documents but shall not give prescriptive advice or consultancy as part of an evaluation. This does not preclude the normal exchange of information with the clients and other interested parties or the provision of different determination activities e.g. inspection, testing, and audit required for specific product verification schemes which are considered acceptable.
10. The Certification Body (and any group within its control; or personnel, employed or contracted, in an organization within its control or organizational control) shall not offer or provide internal management system evaluations to the client or other legal entities involved in the verification process in those schemes that require the client or other legal entities involved in the verification process to perform internal management system evaluations. This also applies to that part of the government identified as the certification body.
11. The certification body shall not verify organisations for which a client has received consultancy or internal evaluations, where the relationship between the consultancy organization and the certification body poses an unacceptable threat to the impartiality of the certification body.
12. The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides consultancy. The certification body shall take action to correct inappropriate claims by any consultancy organization stating or implying that verification would be simpler, easier, faster or less expensive if the certification body were used. A certification body shall not state or imply that verification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.
13. To ensure that there is no conflict of interests, personnel who have provided consultancy for, or been employed by a client, including those acting in a managerial capacity, shall not be used by the certification body to make a verification decision nor resolution of a complaint or appeal for that client within two years following the end of the consultancy or employment.
14. The certification body shall take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations

15. All certification body personnel, either internal or external, or committees, who could
16. influence the verification activities, shall act impartially, and shall not allow commercial, financial, or other pressures to compromise impartiality.
17. The certification body shall not provide any service to the clients other than third-party verification.
18. The certification body shall safeguard the impartiality of its activities and shall provide for an impartiality committee mechanism hereafter referred to as 'the mechanism' through which significantly interested parties like producers, suppliers, users, consumers and conformity assessment experts, can provide input on:
 - a) The policies and principles relating to the impartiality of its verification activities,
 - b) Counteracting any tendency on the part of a certification body to allow commercial or other considerations to prevent the consistent impartial provision of verification activities,
 - c) Matters affecting impartiality and confidence in verification, including openness and public perception
19. The terms of reference, duties, authorities and responsibilities of the mechanism shall be formally documented to ensure:
 - a) Representation of a balance of interests such that no single interest predominates (internal or external personnel of the Certification Body are considered to be a single interest, and shall not predominate),
 - b) Access to all the information necessary to enable it to fulfill all its functions
20. If impartiality is not being achieved by the certification body, the mechanism will be authorized to take appropriate action e.g. informing authorities, accreditation bodies, and stakeholders. In taking appropriate action, the confidentiality requirements of 2.18 relating to the client and certification body shall be respected.
21. Although every interest cannot be represented in the mechanism, a certification body shall identify and invite key interests.

6.2 Publicly accessible information

1. The certification body shall make publicly available accurate information describing its verification processes and the geographical areas in which it operates. The information shall include:
 - a) Reference to the latest Verification Criteria, as set by *trustea*,
 - b) Procedure for obtaining Verification,
 - c) An application form,
 - d) List of documents required to be submitted along with the application,
 - e) Information on fees for application, initial verification, and continuing verification,
 - f) Documents describing the rights and duties of verified clients, and

- g) Information on procedures for handling complaints and appeals.
- 2. Information provided by the certification body to any client or to the marketplace, including advertising, shall be accurate and not misleading.
- 3. On request from any interested party, the certification body shall confirm the *trustea* verification status of any of its clients, including a copy of any current verification certificate.

7 INFORMATION EXCHANGE BETWEEN THE CERTIFICATION BODY AND ITS CLIENTS

- 1. The certification body shall provide timely information to its clients on the following:
 - a) Detailed description of verification activities, including next steps and outstanding actions by the client
 - b) The client's payment status
 - c) All necessary arrangements for the conduct of the on-site audits, including access to all processes and areas, records and personnel for the purposes of *trustea* verification
- 2. The client informs the certification body, without delay, of any changes that may affect its capability to fulfill the *trustea* requirements. These include, for example, changes relating to
 - a) The legal, commercial, organizational status or ownership,
 - b) Organization and management (e.g. key managerial, decision-making or technical staff),
 - c) Production sites,
 - d) Scope of operations under verification, and
 - e) Major changes to the production unit and processes.

8. CONFIDENTIALITY

- 1. The certification body shall, through legally enforceable agreements, have a policy and arrangements to safeguard the confidentiality of the information obtained or created during the performance of verification activities at all levels of its structure, including committees and external bodies or individuals acting on its behalf.
- 2. The certification body shall inform the client, in advance, of the information it intends to share with *trustea* secretariat, especially the verification-related data and also place it in the public domain. All other information, except for information that is made publicly accessible by the client, shall be considered confidential.
- 3. In the event of a transfer of certificate, the accepting certification body shall seek and as deemed necessary verify information about the verified client and the status of non-conformities, evaluation reports, complaints if any etc., and the previous

certification body shall provide the same, under intimation to the verified client.

4. Except as required in this document, information about a particular client or individual shall not be disclosed to a third party without the written consent of the client or individual concerned. Where the certification body is required by law to release confidential information to a third party, the client or individual concerned shall, unless regulated by law, be notified in advance of the information provided.
5. Information about the client from sources other than the client (e.g. complainant, regulators) shall be treated as confidential, consistent with the certification body's policy.
6. Personnel, including any committee members, contractors, personnel of external bodies or individuals acting on the certification body's behalf, shall keep confidential all information obtained or created during the performance of the certification body's activities.
7. The Certification Body shall have available and use equipment and facilities that ensure the secure handling of confidential information (e.g. documents, records).
8. When confidential information is made available to other bodies (e.g. accreditation body, agreement group of a peer assessment scheme), the certification body shall inform its client of this action.

9. LIABILITY AND FINANCING

1. The certification body shall evaluate the risks arising from its verification activities and that it has adequate arrangements (e.g. insurance or reserves) to cover liabilities arising from its operations.
2. The certification body shall together with its senior executive and staff, be free from any commercial, financial, and other pressures which might influence the results of the verification process
3. The certification body shall have the financial stability and resources required for the operation of the verification system.

10. RESOURCE REQUIREMENTS

10.1 Competence of management and personnel

1. The certification body shall have processes to ensure that personnel has appropriate knowledge of tea production, product verification, product standards, related normativereferences,andrelevantregulationsfor the produce for which verification is being offered.
2. It shall determine the competence required for each technical area and for each function in the verification activity.
3. It shall determine the means for the demonstration of competence prior to carrying

out specific functions.

4. In determining the competence requirements for its personnel performing verification, the certification body shall address the functions undertaken by management and administrative personnel in addition to those directly performing evaluations and verification activities.
5. The certification body shall have access to the necessary technical expertise for advice on matters directly relating to verification for technical areas in which the certification body operates. Such advice may be provided externally or by certification body personnel.

10.2 Personnel involved in the verification activities

1. The certification body shall have, as part of its own organization, personnel having sufficient competence for managing the agricultural/tea produce verification scheme.
2. The certification body shall employ, or have access to, a sufficient number of evaluators/inspectors and technical experts to cover all of its activities and to handle the volume of tea produce verification/evaluations performed.
3. The certification body shall make clear to each person concerned their duties, responsibilities and authorities.
4. The certification body shall have defined processes for selecting, training, formally authorizing evaluators and selecting technical experts used in the verification activity. The initial competence evaluation of an evaluator shall include a demonstration of applicable personal attributes and the ability to apply required knowledge and skills during evaluations, as determined by a competent evaluator or observing the evaluator conducting an evaluation. (See 10.2.1 and 10.2.2 for competence requirements of auditors)
5. The certification body shall have a process to achieve and demonstrate effective evaluation.
6. The certification body shall ensure that evaluators (and, where needed, technical experts) are knowledgeable of its evaluation processes, verification requirements, and other relevant requirements. The certification body shall give evaluators and technical experts access to an up-to-date set of documented procedures giving instructions and all relevant information on the verification activities.
7. The certification body shall identify training needs and shall offer or provide access to the same.
8. specific training to ensure its evaluator, technical experts, and other personnel involved in verification activities are competent for the functions they perform.
9. The group or individual that takes the decision on granting verification shall understand the applicable standard and verification requirements and shall have demonstrated competence to evaluate the processes and related recommendations of the evaluation team.

10. The certification body shall ensure the satisfactory performance of all personnel involved in the evaluation and verification activities. There shall be documented procedures and criteria for monitoring and measurement of the performance of all persons involved, based on the frequency of their usage and the level of risk linked to their activities. In particular, the certification body shall review the competence of its personnel in the light of their performance in order to identify training needs.
11. The documented monitoring procedures for evaluators shall include a combination of on-site observation, review of evaluation reports and feedback from clients or from the market and shall be defined in documented requirements drawn up in accordance with the relevant guidance provided in ISO 19011. This monitoring shall be designed in such a way as to minimize disturbance to the normal processes of verification, especially from the client's viewpoint.
12. The certification body shall periodically observe the performance of each evaluator on-site. The frequency of on-site observations shall be based on need determined from all monitoring information available.
13. The personnel performing the application review shall be qualified for their understanding of the verification criteria, regulatory requirements, evaluation methods and the verification scheme.
14. The personnel performing the verification decision shall be qualified for their understanding of the verification criteria, and verification scheme and their ability to correctly grant or expand the scope of verification (if a scope of verification is used) on the basis that the evaluation activities, information and results are a demonstration of fulfillment of requirements of the verification criteria in accordance with the verification scheme.
15. Competence of auditors - Every person undertaking *trustea* verification audits must have the appropriate qualification, training, experience and skills to perform an audit against the relevant criteria for verification.
16. The certification bodies shall develop and share a plan to encourage and include lady auditors as part of the *trustea* audit team. This shall be done in a phased and gradual manner over the next three years.

“trustea seeks mandatory involvement of a female (auditor/interviewer/ interpreter) during the *trustea* audits when a female respondent is to be interviewed /questioned. The criteria of a female auditor from the certifying/auditing body might be relaxed in case of exigencies that threatens the security of a female auditor. However, an attempt shall always be made to involve female interpreter/ interviewer from the surrounding localities whenever a female respondent is to participate in the audit.”

10.2.1 Lead Auditor (LA)

- i. Education and Work Experience: The CB shall ensure that Lead Auditor shall be a graduate and should have at least five (5) years of full-time post-qualification industrial experience including at least two (2) years of work experience in the manufacturing process or inspection/testing or auditing or equivalent. Experience in tea sector or agriculture sector is desirable.
- ii. The LA should also have participated in training on the *trustea* Code and clearance of the *trustea* exam with at least 80% marks.
- iii. Auditor training: The certification body shall ensure that auditors have undergone training in auditing techniques based on ISO 19011 such as a successful completion of a Lead Auditor course in at least one of the below groupings –
 - a. Any one of the following- ISO 9001/ ISO 22000 /Organic Farming (NPOP, NOP).
AND
 - b. Any one of the following- ISO 14001 / ISO 45001 / SA8000. Prior experience in conducting audits for RA-Utz, *trustea*, organic private labels (biosuisse, Naturland, Demeter, Hand in hand), RHP and RA assessment, *expresso* is preferred.
- IV. The LA shall have the ability to draft a good audit report in English.
- V. The person appointed for *trustea* audits for leading the audit team shall be qualified as Lead Auditor for at least one of the above-mentioned standards. The process for qualification shall be on similar lines as the CB would have defined under its ISO 17021-1 / ISO 17065 accreditation.

10.2.2 Auditor

- i. Auditor Education: The CB shall ensure that Auditors shall be graduates and should have at least three (3) years of full-time post-qualification industrial experience including at least two (1) years of work experience in manufacturing process or inspection/testing or auditing or equivalent. Experience in the tea sector or agriculture sector is desirable.
- ii. Audit experience of *trustea* Auditor: The auditor is expected to have experience participating as an observer in a minimum of 5 audit days or three different *trustea* verified organisations under a qualified lead auditor. The CB shall monitor the on-site performance of the auditor prior to assigning him/her the role of an independent team member.
- iii. Auditors training is as per the LA training requirements, the person appointed for *trustea* audits as a team member shall be qualified as Auditor for at least one of the above-mentioned standards. The process for qualification shall be on similar lines as the CB would have defined under its ISO 17021-1 / ISO 17065 accreditation.

10.2.3 Cooling-Off Period for Former *trustea* Personnel

Any individual who has been involved in *trustea* training, implementation activities, or has been directly employed under the *trustea* payroll shall not be permitted to

conduct *trustea* audits for a period of one year following their exit from *trustea* or from any *trustea* implementation programme. The individual shall become eligible to undertake *trustea* audits only after the completion of this one-year cooling-off period.

10.3. Selection of the Audit Team

1. The certification body shall ensure the competence of the evaluation team. The evaluation team shall have appropriate knowledge of the field, the applicable regulatory requirements, the process and the good agricultural practices adopted and practiced in the cultivation and management of tea gardens. The evaluation team shall comprise duly qualified evaluators supplemented by technical experts, if need be, meeting the competence requirements prescribed above. All such evaluators shall also be employed or contracted full-time with the CB.
2. The certification body shall identify and provide the competence needed to perform the initial evaluation of the applicant on-site considering the processes employed in *trustea* Code verification.

Language skills: Auditors shall have language competency appropriate to the assignment. In case local language skills are not available in the audit team, an interpreter shall accompany the team.

3. Each audit team shall consist of at least one lead auditor and at least one member in the audit team who should have attended 40 hours of training on occupational health and safety and at least one member should have completed successfully a HACCP training or ISO 22000 course. In case where there is a single-person audit team, the concerned auditor shall have the competence as applicable for the qualified Lead Auditor, as per Section 10.2.1 above.
4. A technical expert may be a part of every audit team to ensure the competence of the audit team to fulfill the above requirements. The technical experts may be external resources.
5. The Certification Body must ensure auditors' calibration every 2 years based on the evaluation feedback from *trustea* apart from their internal calibration mechanism which is mandatory for the CBs. Record of Internal calibration with action on *trustea* feedback will be a part of the CB evaluation by *trustea*. This may include additional onsite internal witness audits, face-to-face discussions, calibration meets etc., as appropriate to the feedback.
6. In case of inadequate performance *trustea* may decide to suspend the LA qualification of the auditor for a period of 6 months and eventually disqualify if no improvement is seen. Decisions to revoke the suspension will be based on evidence provided by the CB based on the actions taken as above. In case of serious violation is found on wrong observation of zero tolerance or similar or in any ethical ground *trustea* may disqualify the auditor directly without allowing any suspension. The decision can be reviewed based on some agreed process.

10.4 Conduct of auditors during audits

The Certification Body shall ensure that auditors

1. Dress and act appropriately for the environment they operate in
2. Do not reveal possible non-conformances to anyone else than the appointed person in the client organization during the course of an audit
3. Do not engage in consultancy, workers' rights education, or similar activities that go beyond auditing.

10.5 Use of individual external technical experts

The certification body if it requires external technical experts who meet the *trustea* qualification criteria, needs to have a written agreement by which such experts commit themselves to comply with applicable policies and procedures as defined by the certification body. The agreement shall address aspects relating to confidentiality and to independence from commercial and other interests and shall require external technical experts to notify the certification body of any existing or prior association with any organization they may be assigned to audit.

10.6 Outsourcing

1. The CB shall not outsource any activity other than testing
2. When the certification body outsources testing, the body doing the outsourced work shall meet the applicable requirements of ISO/IEC 17025 and shall be NABL accredited.

10.7 Technical Reviewer

1. The person responsible for the final audit report approval from the CB side must be a *trustea* qualified lead auditor
2. The reviewer must have adequate knowledge about *trustea* code management system operation (tCMS) as well and must participate in all the technical training provided from *trustea's* end.
3. The technical reviewer cannot perform the final review for his/her own audit.
4. To ensure conformity with point number 3, the CB must identify more than one reviewer.
5. The reviewer must have adequate expertise to understand the team composition with relevant qualifications as per *trustea's* requirement.

10.8 Translator or Lady Interviewer

1. The translator or lady interviewer should not be a part of the organization, which is being audited.
2. They should be adequately briefed about the purpose and goals of the audit.
3. To the extent possible the names should be mentioned in the audit plan.

11. PERFORMANCE DEVELOPMENT & EVALUATION OF AUDITORS AND CERTIFICATION

BODY:

- 11.1 TSTF carries out oversight activities of the Certification Body and its Auditors to ensure compliance with the requirements.
- 11.2 After the auditors start audit work after meeting all the criteria performance evaluation of the auditors has to be carried out by both the CB and *trustea*. CB will carry out the evaluation as per clause number 6 as per the CB audit template.

Trustea will carry out the performance evaluation by the following methodology:

- 1. Office Assessment of the CB Contracted office
- 2. Witness audits of CB Auditors
- 3. Review of audit report of CB Auditors
- 4. Stakeholder feedback
- 5. Auditor interview during CB audit (during office/witness audits)

This evaluation will be done with a fixed sampling plan for the year at a minimum of 20% of the auditor pool per year spread out across the agencies with consideration of the number of audits carried out by the specific agency. The frequency of these assessments is typically once every two years. The report will be shared with the concerned agency for corrective action.

- 11.3 Evaluation of the performance of certification bodies will be done by the following methodology:
 - 1. CB audit by *trustea* (once in two years)
 - 2. Annual performance evaluation

- 11.4 Performance Development: CB auditors' performance development is one of the major processes of *trustea* where *trustea* continues monitoring and evaluating and based on the assessment, *trustea* plans the agenda of yearly system assurance review meetings for both CB auditors and IP personnel together. Apart from the planned yearly review meeting, *trustea* provides refresher training to the auditors and field training to the IP personnel based on the evaluation result.

12. AUDITS

12.1 Audit process

Audits shall be conducted in line with section 3 of Part 1 of the General Regulations in the System Assurance Protocol.

12.2 Sample size

- 1. In case of group verification, the CB must conduct audits as per 5.2.4, Part 1 of the General Regulations in the System Assurance Protocol.

If there are geographical, varietal or other significant differences within the total population, stratified audit days should be drawn.

- 2. Farms are not allowed to refuse to be audited whether audits are announced or unannounced audits.
- 3. The selection of farms for auditing must never be based on

- a. Proximity to processing facilities, roads or accommodation for auditors
- b. Level of involvement in the *trustea* process
- c. Membership of ownership or management in local or national government organizations or NGOs.

13. **TRANSFER OF VERIFICATION**

1. Certificates granted by a *trustea* approved CB are eligible for transfer to another *trustea* approved CB.
2. Transfer should normally only be of a current valid accredited certificate but, in the case of a certificate issued by a certification body that has ceased trading, or that has had its accreditation withdrawn, the accepting certification body may, at its discretion, consider such a certificate for transfer on the basis described in this guidance.
3. The accepting certification body shall ascertain the reasons for seeking a transfer, establish that the client's verified activities fall within the accredited scope of the accepting Certification Body.
4. The accepting certification body shall verify the validity of verification, and status of outstanding nonconformities with the issuing certification body unless it has ceased trading. Outstanding nonconformities should be closed out, if practical, with the issuing verification/registration body, before transfer. Otherwise, they should be closed out by the accepting verification/registration body.
5. Certificates that are known to have been cancelled or to be under threat of cancellation shall not be accepted for transfer.
6. The accepting Certification Body shall issue a certificate, dated from the date of completion of the review, following the normal decision-making process.

14. **FEES**

1. Fees charged by the CB for onsite audits of the scheme, shall be the same without any discrimination between units, geographical location, or size of the unit. Onsite audit days has to be calculated as per the latest audit days calculation table. If any changes are required in the total calculated days, the CB must inform *trustea* secretariat before the audit is planned.
2. The CBs fee structure shall be publicly accessible and also be provided on request.
3. The CB shall notify and obtain consent to its fee structure from the organizations prior to engaging in verification activities. As and when the fee undergoes a change, the same shall be communicated to all including applicants and the manufacturing units verified under this scheme of verification for their acceptance.

15. **SANCTION AGAINST CBS**

trustea approval of a certification body can be withdrawn under the following conditions:

1. Failure to submit annual reports to the *trustea* Secretariat within one month from the completion of each reporting year.
2. Any violation of the *trustea* Code of Conduct, audit rules, or other ethical requirements, including malpractice, misconduct, or any action by CB personnel (including auditors or groups of auditors) that poses a threat to the integrity, credibility, or reputation of the *trustea* standard or organisation.
3. Failure to declare any major conflict of interest, or instances of fraudulent behavior reported against any member of the audit team or CB personnel.
4. In cases where conflict of interest or fraud is identified and may have impacted the credibility of audits conducted, the verification status of the affected organisations shall be changed to “Verification Pending,” and the *trustea* Secretariat shall instruct such organisations to undergo re-audit by an alternate CB within six weeks of notification. The concerned CB shall be fully liable for such actions and shall reimburse the affected organisation for the re-audit fees charged by the new CB.
5. Based on the severity and nature of the non-compliance, *trustea* may impose suspension of the CB for a period of up to one year, either partially (limited to a specific region, scope, or auditors) or in entirety, or proceed with full withdrawal of approval.
6. During any period of suspension, the CB shall undertake a comprehensive root cause analysis and submit documented evidence of corrections along with a robust corrective action plan. Reinstatement of the CB or the concerned auditors shall be subject to *trustea*'s review and satisfaction with the adequacy and effectiveness of the proposed actions, including implementation of preventive measures to avoid recurrence.
7. Voluntary withdrawal by the Certification Body.

Note: Even after submission of satisfactory root cause analysis, corrections, and corrective action plan, *trustea* reserves the right to withhold reinstatement of the Certification Body or individual auditors based on prevailing operational requirements. This may include situations where alternative Certification Bodies have been appointed to bridge operational gaps, and the immediate engagement of the concerned CB or auditors is not required.

16. **GRIEVANCE REDRESSAL MECHANISM**

1. Scope

This document defines the procedure for the receipt, handling, tracking, and redressal of grievances and feedback received by the *trustea* Sustainable Tea Foundation through its established systems.

2. Procedure

Grievances and feedback may be submitted through the *trustea* website via the designated portal: <https://www.trusteacms.in/feedback> . All submissions are recorded and managed through the *trustea* Code Management System (tCMS) in accordance with the following process:

- a) Upon submission of a grievance or feedback, it is received by the designated *trustea* user, and an auto-generated acknowledgment email is sent to the applicant, including the indicative resolution timeline.

b) The grievance is logged in the system with the status marked as “Pending,” and automated reminders are generated and sent to the concerned *trustea* personnel until action is initiated.

c) The designated *trustea* user reviews and verifies the submitted grievance/feedback and provides an appropriate response through the system.

d) Once a response is provided, the applicant receives an auto-generated email notification, and the status is updated to “Replied.”

e) In cases where additional information or clarification is required, *trustea* communicates the request through the portal, and the status is updated to “In Process.” Automated reminders continue until the case progresses.

f) Upon resolution of the grievance, the applicant is informed through an email detailing the resolution, and the status in the system is updated to “Resolved.”

g) The resolution communication shall include escalation contact details (grievanceescalation@trustea.org) for the applicant to use in case they are not satisfied with the outcome of the first-level resolution.

3. Tracking and Management

a) All grievances, actions taken, and resolution details are systematically recorded and maintained within the tCMS, enabling traceability, monitoring, and management review, including identification of corrective actions where required.

b) The overall grievance redressal process and system effectiveness shall be reviewed annually as part of the internal audit under the Quality Management System in line with ISO 9001 requirements.

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