



# Approval and Oversight for Monitoring Firms

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## **1 PURPOSE AND SCOPE**

- 1.1 This document specifies the procedure for the approval and oversight of monitoring firms and monitoring firm verification staff including the competency and training requirements for conducting GAP Connections (GAPC) Monitoring Activities and the verification mechanism to assess whether the requirements are fulfilled.
- 1.2 The purpose of this procedure is to ensure the integrity and transparency of the GAPC monitoring firm and monitoring firm verification staff approval process.

## **2 DEFINITIONS**

- 2.1 Approval: Official permission and recognition by the GAPC Board of the competency and qualifications of a monitoring firm and monitoring firm verification staff to perform monitoring activities including Certification Visits.
- 2.2 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.
- 2.3 Audit Scheduling Tool: Tool located on the GAPC website where auditors, 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.
- 2.4 Auditor Scorecard: Report located on the GAPC website to track and document errors on reports.
- 2.5 Monitoring Activities: Documented process which occurs annually in a repeating cycle beginning with an Audit, followed by a Site Visit.
- 2.6 Monitoring Firm: Formal, third party who has been approved to identify monitoring firm verification staff to perform GAPC monitoring activities.
- 2.7 Monitoring Firm Verification Staff: Personnel identified by monitoring firm to perform monitoring activities.
- 2.8 Shadow Visit: Visits conducted with monitoring firm verification staff to gauge performance and preparedness. Shadow visits may be conducted by GAPC staff or monitoring firm supervisor.

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

### **3 APPROVAL CRITERIA**

3.1 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.

3.2 To be considered for approval by the GAPC Board of Directors the Monitoring Firm shall:

- 3.2.1 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.
- 3.2.2 Require each monitoring verification staff conducting GAPC Certification Visits agree to Code of Conduct for Approved Auditors (Appendix A) and to follow the GAPC Certification Monitoring Protocols.
- 3.2.3 Require each monitoring verification staff conducting GAPC Certification Visits to attend annual GAPC Auditor Training.
- 3.2.4 Be able to ensure that all monitoring activities will be completed by October 31st of the current year.

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

### **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 experience in developing, administering, and facilitating on-farm and/or Good Agricultural Practices assessments and Certification Programs

- b. Examples of GAP assessments or Certification Monitoring Visits conducted by or with your organization
- c. Testimonials or references from past clients
- d. Anticipated resources you will assign to this project (total number, role, title, experience)
- e. Project management methodology
- f. List of assessors/auditors that will be conducting monitoring visits on behalf of GAPC, along with their resume/experience.
- g. Customer service aspects that the monitoring firm offers such as advance scheduling and pre-visit reminders or calls to prepare
- h. Maximum pricing for monitoring activities

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.

4.3 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.

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 complete the GAPC conflict-of-interest policy and submit their conflict-of-interest policy for their monitoring verification staff.

5.2 All monitoring firms and monitoring firm verification staff will be required to review and sign the Code of Conduct for GAPC Approved Auditors, and to uphold the integrity and ethical standards of the GAPC Certification program and GAPC.

5.3 Monitoring firm 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 monitoring verification staff who have auditing experience, have attended GAPC auditor training, and have reviewed and signed the Auditor Code of Conduct.
- 6.2 Oversight of each monitoring firm 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 Auditor Scorecard (tracking errors and corrections),
  - c. Review of the GAPC Auditor Schedule Tool (verifying proper use and scheduling),
  - d. Shadow visits to monitor a monitoring firm verification staff's and monitoring firm's performance during a monitoring visit, and
  - e. The GAPC's Review and Dismissal Policy for Approved Auditors (Section 8).

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

- 7.1 All monitoring firm reports shall be reviewed by GAPC, and feedback sent to the monitoring firm 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
  - 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 monitoring firm 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 REVIEW AND DISMISSAL POLICY FOR MONITORING VERIFICATION STAFF**

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

- 8.1.1 First notice: Auditor is issued a written notification detailing violations and non-compliance. Audit 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.
- 8.1.2 Second notice: Auditor 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 auditor being removed from the approved list of GAPC Certification auditors. A meeting/conference will be scheduled with GAPC staff, the auditor, and auditor supervisor if needed. Audit 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.
- 8.1.3 Third notice: Auditor will be reviewed by the Monitoring Advisory Committee. The auditor, auditor 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.

## **9 CONDITIONS FOR REMOVAL OF APPROVED MONITORING FIRM**

9.1 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 trademarks.

## **10 REFERENCES TO OTHER DOCUMENTS OR POLICIES**

- 10.1 Request for Proposal (RFP)
- 10.2 GAPC Certification Monitoring Protocols
- 10.3 Auditor Code of Conduct (Appendix A)

## **APPENDIX A**

### **Code of Conduct for GAP Connections Approved Auditors**

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

#### **Integrity**

The integrity of auditors establishes trust and provides the basis for reliance on auditor's judgment. As an approved auditor, 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**

Auditors must be objective in gathering, evaluating, and communicating information about the practices and activities being examined. Auditors 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 auditor, 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**

Auditors 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 auditor, 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**

Auditors must apply their knowledge, skills, and experience in the performance of their assessment duties. As an approved auditor, 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**

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

1. First notice: Auditor is issued a written notification detailing violations and non-compliance. Audit 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: Auditor 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 auditor being removed from the approved list of GAPC Certification auditors. A meeting/conference will be scheduled with GAPC staff, the auditor, and auditor supervisor if needed. Audit 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: Auditor will be reviewed by the Monitoring Advisory Committee. The auditor, auditor 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.

## 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 Certification program 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 Certification 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 auditor. The parties agree that GAP Connections has no supervisory authority over the time, manner and methods of services provided by Auditor or Auditor's employer or any other party with whom Auditor contracts. Nothing in this Code of Conduct shall be interpreted to be contrary to that agreement.*