



OECD Alignment Assessment Pilot

of collaborative
initiatives against the
OECD Due Diligence
Guidance for
Responsible Supply
Chains in the
Garment and
Footwear Sector

January 2018

Overarching criteria

1. Policy and management systems

2. Identify harm

3. Prevent & mitigate harm

4. Track

5. Communicate

6. Remediation

Collaboration

Governance

Results



Collaboration

What does the OECD Due Diligence Guidance say about collaboration on due diligence?

Collaboration is encouraged throughout the due diligence process. Many of the recommendations in the OECD Due Diligence Guidance may be applied in collaboration at a sector level, directly in partnership with trade unions or through multi-stakeholder initiatives.

Collaboration does not alter the responsibility of the individual enterprise to identify, prevent or mitigate harm. However, collaboration can be used as a means of carrying out due diligence.



Purpose and nature of the OECD Alignment Assessment

A benchmark for due diligence

The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector is used as the benchmark for due diligence by many industry and multi-stakeholder initiatives.

Purpose of the Alignment Assessment

The purpose of the Alignment Assessment, therefore, is to gauge the alignment of the standards and implementation of these initiatives with due diligence recommendations in the OECD Due Diligence Guidance.

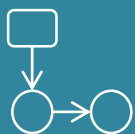
A voluntary assessment

The Alignment Assessment is purely voluntary.



Alignment Assessment process

1. Planning



- Determine the:
1. **Scope** of the assessment
 2. Assessment **activities**
 3. Assessment **timeline**

2. Document review



1. Confirm the Initiative's activities
2. Evaluate the Initiative's standards
3. Review evidence on implementation

3. Interviews



1. Stakeholders within the Initiative
2. Stakeholders affected by the Initiative
3. External experts (as relevant)

4. On-site evaluation



1. Evaluation of Initiative's activities on-site

5. Analysis and reporting



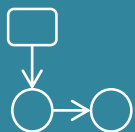
1. Analysis of the Initiative's alignment with core criteria
2. Report on the conclusions of the Assessment and relevant recommendations



1. Planning

All planning activities are carried out in close consultation with the initiative being evaluated.

1. Planning



Determine the:

1. **Scope** of the assessment
2. Assessment **activities**
3. Assessment **timeline**

1. Define the scope of the assessment

The Initiative is assessed against those aspects of the Guidance which the initiative is designed to carry out.

Example considerations include:

- Does the initiative have a standard(s) for a due diligence process?
- Does the initiative itself carry out a due diligence process on behalf of its members? (e.g. Supplier assessments or training, grievance mechanism, etc.)
- Does the initiative evaluate its members on how they carry out a due diligence process?
- Does the initiative focus on a specific production process in the supply chain, a specific risk, and/or a particular geographic region?

2. Determine the activities of the assessment

The specific activities to be conducted under the assessment are based on the scope of the assessment and the OECD Methodology for the alignment assessment, but will include some or all of the following components: document review, interviews, on-site assessments, and analysis and reporting.

2. Develop a project timeline

A timeline is determined for assessment and reporting based upon the scope of the assessment and agreed upon activities.



2. Document review

2. Document review



1. Confirm the Initiative's activities

2. Evaluate the Initiative's standards

3. Review evidence on implementation

The OECD carries out a desk-based assessment of relevant documentation obtained from the initiative. The primary purpose of the document review is to:

1. Confirm the aspects of due diligence that the initiative is designed to carry out.

For example, this step will include a review of statements made by the initiative on the scope of due diligence activities it carries out for or on behalf of its members.

2. Evaluate the initiative's standards or procedures against the Guidance using the Alignment Assessment Tool

The OECD analyses the detailed requirements that the Initiative sets for itself and for members in relation to due diligence (or aspects of due diligence) against the recommendations in the OECD Due Diligence Guidance.

3. Review evidence of how the Initiative may be implemented

Relevant and credible documentary evidence is reviewed on how the initiative may be implementing activities. Both internal reports – such as progress reports – and external reports, where relevant and available, are included.



3. Interviews

The sources of information are protected and should only be quoted with explicit agreement.

3. Interviews



1. Stakeholders within the Initiative
2. Stakeholders affected by the Initiative
3. External experts (as relevant)

1. **Semi-structured interviews with stakeholders within the Initiative**

Interviews with personnel

The criteria in the Assessment Tool guide the focus of these interviews. The document review should also help appropriately target interview questions. Interviews with internal stakeholders may help flag any additional documentation which should be reviewed within the scope of the assessment.

Interviews with members

Interviews with members is intended to capture useful contextual information about member experience participating in the Initiative. In some instances, there may be partner organisations who are involved in implementing the Initiative, in which case interviews with relevant personnel from these organisations is also appropriate.

2. **Semi-structured interviews with relevant stakeholders affected by the Initiative**

Interviews with impacted stakeholders (e.g. non-member companies, workers) may be included to provide useful information to support the OECD's analysis of the Initiative's alignment with the OECD Due Diligence Guidance.

Semi-structured interviews with external experts (as relevant)

External experts may be interviewed if they hold a particular expertise relevant to the Initiative. For example, experts may be interviewed to provide technical feedback on the content or approach of the initiative. External experts may also be engaged if they have conducted prior assessments of the Initiative.



4. On-site evaluation

4. On-site evaluation



1. Evaluation of Initiative's activities on-site

In some cases, an on-site evaluation of the Initiative's activities may be warranted. This may be particularly true when the Initiative carries out due diligence activities—such as assessments, training and capacity building, etc. – on behalf of its member companies.

In most cases on-site evaluation will be coupled with key informant interviews with stakeholders within the initiative, stakeholders affected by the initiative and relevant experts (Step 3).



5. Analysis and reporting

5. Analysis and reporting



1. Analysis of the Initiative's alignment with core criteria

2. Report on the conclusions of the Assessment and relevant recommendations

1. Analysis

This analysis includes consideration of all the information gathered to evaluate the extent to which the Initiative is aligned with the OECD Due Diligence Guidance. Core criteria laid out in the Alignment Assessment Tool are provided a score from 1 to 4 with 1 being 'not aligned' and 4 being 'fully aligned'. The Alignment Assessment is not a check-the-box exercise, and therefore discretion is required on the part of the evaluator.

2. Reporting on the conclusions of the Assessment and relevant recommendations

Aspects covered in the Alignment Assessment Report include:

- Conclusions of the Initiative's alignment with core criteria of the OECD Guidance, including contextual information and justification for the results;
- Recommendations for improvement on core criteria;
- Findings of the Programme Governance Review and Collaboration Review and recommendations for improvement; These do not form part of the formal Alignment Assessment Conclusions
- Findings on how the initiative is being engaged with and communicated on by members based on the 'Accountability criteria' in the Alignment Assessment Tool. These do not form part of the formal Assessment Conclusions

The Alignment Assessment Report is published by the OECD. Prior to publication, the Initiative has opportunity to review and react to the report and to include the Initiative's response in the published report. The Alignment Assessment Tool is not published.



Components of the Alignment Assessment Tool

Overarching criteria	Based on key aspects of due diligence that are applicable across all due diligence activities
1. Policy and management systems	Evaluates alignment with the 6 step framework under the OECD Due Diligence Guidance & accompanying modules.
2. Identify harm	Core criteria are aligned with the recommendations in the OECD Guidance and include the key criteria against which the Initiative is assessed.
3. Prevent & mitigate harm	Core criteria components include information that should be taken into account when assessing whether the enterprise or initiative is meeting the core criteria.
4. Track	Issue-specific components , includes additional information that should be taken into account when assessing whether the enterprise or initiative is meeting the core criteria for a specific risk. Not all risks covered in the tool have additional issues-specific components, however, the core criteria apply to all risks.
5. Communicate	
6. Remediation	
Collaboration	Includes criteria for cooperation on due diligence. These do not form part of the formal Assessment Conclusions.
Governance	Includes questions relating to good practice in governance. These do not form part of the formal Assessment Conclusions.
Results	Includes aggregate findings on the Initiative's alignment with the OECD Due Diligence Guidance across the 6 steps of the Guidance.

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