

INTERNATIONAL RECRUITMENT INTEGRITY SYSTEM (IRIS) VOLUNTARY MULTI-STAKEHOLDER CERTIFICATION SCHEME FOR LABOUR RECRUITERS

IRIS CERTIFICATION AND AUDIT PROTOCOLS

ISSUE 1.0 – DECEMBER 12, 2021

Table of Contents

1. Introduction	4
1.1. Purpose of these Protocols	4
1.2. Maintenance and Use of these Protocols	4
1.3. Terms Used within this Document	4
2. IRIS Scheme Interpretation Protocols	5
2.1. Rigorous Application of IRIS Principles	5
2.2. Minimum Evidence of Conformity	5
3. Audit Company Personnel Competency/Qualification Protocols	7
3.1. General	7
3.2. Management of Audit Company Personnel Competence	7
3.3. Auditor Assignments and Audit Team Composition	7
3.4. Registered IRIS Audit Team Leader - Experience and Competence Requirements	8
<i>Table 3.4 Registered IRIS Audit Team Leader - Experience and Competence Requirements</i>	8
3.5. Registered IRIS Auditor - Experience and Competence Requirements	9
<i>Table 3.5 Registered IRIS Auditor - Experience and Competence Requirements</i>	9
3.6. IRIS Program Manager - Experience and Competence Requirement	10
<i>Table 3.6. IRIS Program Manager - Experience and Competence Requirements</i>	11
4. Audit Effort Protocol	12
4.1. Minimum Audit Effort Considerations	12
4.2. Audit Effort Calculation Tables	12
<i>Table 4.2a – Minimum Initial Certification and Recertification Baseline Audit Days (Every 24 months)</i>	12
<i>Table 4.2b – Minimum Additional Initial Certification and Recertification Audit Days per Number of Employer Contracts</i>	12
<i>Table 4.2c – Minimum Surveillance Audit Baseline Audit Days (6 & 12 months etc.)</i>	13
<i>Table 4.2d – Minimum Additional Surveillance Audit Days per Number of Employer Contracts</i>	13
5. Labour Recruiter Office Sampling Protocol	14
5.1. File Sampling Requirements	14
6. Validation Sub-Audit (VSA) Protocol	17
6.1. VSA Overview	17
6.2. VSA Elements:	17
6.3. VSA Sampling	17
6.4. VSA Methodology Factors	18

6.5. VSA Methodology Determination	19
<i>Table 6.5 – Sampling Factors for Business Partners and Sub-Agents</i>	<i>20</i>
7. Worker Interview Protocol	21
7.1. General	21
7.2. Worker Interview Sampling	21
7.3. Number of Workers to be Interviewed	21
<i>Table 7.3 Number of Workers Interviewed for each VSA-Selected Agreement</i>	<i>21</i>
7.4. Interview Protocol Guidance	21
7.5. Interview Sample Questions	22
8. Audit Planning, Performance and Decision-Making (IRIS Audit Tool)	25
8.1. Overall Planning of IRIS Audits	25
8.2. IRIS Audit Tool	25
8.3. Use of the IRIS Audit Tool	25
9. Audit Team Research and Understanding of Labour Recruiter Risks	27
9.1. Familiarity/Research Requirement.....	27
9.2. Information and Resources	27
10. Document Revision Table	28

1. Introduction

1.1. Purpose of these Protocols

This protocol document has been developed by the IRIS Scheme Manager on behalf of the IRIS Scheme Owner to outline consistent certification and audit protocols to be applied by applicant and approved Audit Companies. This document supplements Scheme requirements specified in the [“IRIS Scheme General Requirements”](#) document.

These protocols have been developed in order to:

- Define and document detailed IRIS audit and certification process requirements to build upon the IRIS General Requirements.
- Promote the delivery of equivalent, consistent, robust and replicable audit and certification processes by Audit Companies.
- Provide Labour Recruiters and other interested parties with insight into audit and certification protocols and controls required by the IRIS Certification Scheme.

1.2. Maintenance and Use of these Protocols

The term “SHALL” is used throughout these protocols to indicate those provisions that are mandatory. The term “SHOULD” may be used alternatively in some circumstances to denote provisions that may not be mandatory in every situation, but which are strongly advised in order to achieve control, consistency and conformity.

These protocols SHALL be publicly maintained and updated from time to time by the IRIS Scheme Manager (after consultation with the IRIS Scheme Owner and other stakeholders, where appropriate). ACs SHALL be notified of changes and provided with a deadline for full adoption of modified/changed requirements.

ACs SHALL integrate the requirements of these protocols into a documented management system developed to fulfil these and other scheme requirements. (Refer to IRIS General Requirements Paragraph 7.3).

1.3. Terms Used within this Document

The majority of IRIS Certification-Specific terms used in this document are defined within the ‘Terms and Definitions’ subsection of the [IRIS Scheme General Requirements Document](#). Where necessary, terms unique to this document are defined below.

- 1.3.1.** No additional terms have yet been defined
-

2. IRIS Scheme Interpretation Protocols

2.1. Rigorous Application of IRIS Principles

In general, IRIS Auditors are required to rigorously apply the requirements of the IRIS Standard in accordance with its (the IRIS Standard) Principles, Criteria and Indicators (as defined within the IRIS Audit Tool). In cases where of evidence conformity or nonconformity to a particular Indicator remains ambiguous, the Audit Team Leader seeks further information from:

- [Overview of the IRIS Standard](#) (Briefing Note)
- [IRIS Standard Introduction Video](#). (YouTube)
- Summary of the recruitment fees and costs (embedded within in the IRIS audit tool)
- International Labour Organisation Definition of Recruitment Fees and Costs – [ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](#). (ILO publication)

Should any continuing doubt exist, Audit Team Leader shall default to the interpretation that would be most beneficial to the majority of workers in the medium-to-long-term. If (following an attempt to justify the validity of an audit finding), Audit Team Leader's nonconformity determination is still challenged by a Labour Recruiter, the Audit Company's appeals process (compliant with IRIS General Requirements section 6) shall be initiated.

2.2. Minimum Evidence of Conformity

The IRIS Scheme recognizes that Labour Recruiters expend considerable time and effort to meet the requirements of the IRIS Standard, and to demonstrate that they consistently adhere to them. The IRIS program also recognizes that it is typically not feasible for a Labour Recruiter to retroactively amend service agreements or worker contracts that are long-term, and may have been established prior to the Labour Recruiter's formal commitment to IRIS principles (resulting historic contract file evidence, which is still 'live', but which may be incomplete with respect to demonstrating full conformity to certain IRIS criteria and indicators). With this in mind (and with due respect to the overriding requirements of section 2.1. above "Rigorous Application of IRIS Principles"), Audit Companies SHALL consider and apply the following guidance when evaluating Labour Recruiter conformity evidence during initial certification and subsequent audits. Evidence is presented by the Labor Recruiter to demonstrate that:

- No **non-fully-IRIS-compliant** Employer Service Agreement has been executed within the six months prior to initial certification (or thereafter)
- Any currently valid, **non-fully-IRIS-compliant** Employer Service Agreements is:
 - at least six months old (at the time of the initial certification audit)
 - currently being managed and reviewed in accordance with IRIS Principles (notwithstanding omissions within historic documentary/record evidence)
- Where currently valid, **non-fully-IRIS-compliant** Employer Service Agreements remain in place, Labour Recruiter is able to demonstrate:
 - Workers deployed overseas under such agreements have been informed of the introduction of applicable IRIS policies and processes (for example: access to worker feedback and grievance mechanisms)
 - Operational practices which may have been non-fully-IRIS-compliant at the inception of the agreement are, where feasible, the subject to appropriate continual improvement initiatives which respect IRIS Principles.

- Any/all IRIS Employer Service Agreements (“Job Orders”) established in the six months preceding the certification audit (and any/all thereafter) are **fully-IRIS-compliant**, and at least one such agreement has been executed to the extent that the following can be demonstrated by the Labour Recruiter:
 - Associated legal, due diligence and management system records are fully-IRIS-compliant and available for review
 - Associated worker contracts are fully IRIS compliant
 - Associated business partner agreements are fully-IRIS-compliant
 - A minimum of 10 workers (total) have been, (and remain currently), deployed overseas in accordance with **fully-IRIS-compliant** policies, procedures and practices.
 - Effective worker communication and grievance mechanisms are understood and used by currently deployed workers
-

3. Audit Company Personnel Competency/Qualification Protocols

3.1. General

These protocols expand upon IRIS General Requirements section 7, “Audit Company Management Process Requirements”.

It is anticipated for these protocols to be further developed and expanded over time as:

- the IRIS Certification Scheme is currently in its roll-out phase
- the IRIS competence requirements are under review

3.2. Management of Audit Company Personnel Competence

(Expands on IRIS General Requirements Section 7 - particularly paragraphs 7.1 and 7.4)

3.2.1. Applicable Normative Requirements

Audit Company processes for managing and assuring the competence of individuals involved with the IRIS program (planning, administering, managing, auditing and certifying Labour Recruiters) shall adhere to the requirements of ISO/IEC 17021-1:2015 - In particular Annex A – “Required Knowledge and Skills” which specifies:

- Competence requirements for management systems auditors (A2)
- Competence requirements for personnel reviewing audit reports and making certification decisions (A3)
- Competence requirements for personnel conducting the application review to determine audit team competence required, to select the audit team members, and to determine the audit time (A4)

In addition to meeting the general requirements defined above, Audit Company processes shall ensure and demonstrate that individuals involved with the IRIS program additionally adhere to IRIS-Specific competence requirements defined in the IRIS Certification Scheme General Requirements document and in the paragraphs below.

3.2.2. Demonstrating Competence and Continual Professional Development

In order to demonstrate conformity to the requirements above, the Audit Company shall:

- maintain competency development plans and records for individuals involved with the IRIS program showing that competence is maintained and continual professional development achieved.
- maintain (for review by Scheme Manager Auditors during Head Office Audits) centralized audit effort logs clearly showing the time spent Audit Company Auditors spend on IRIS audits and associated activities (including planning, preparation, reporting and follow-up of IRIS audits).

3.3. Auditor Assignments and Audit Team Composition

(Expands on IRIS General Requirements Paragraph 4.3.1)

3.3.1. General

Audit Company shall ensure that personnel appointed to audit teams, between them, reflect the totality of competencies, location-specific knowledge, language skills and cultural knowledge required to perform the audit being undertaken.

Additionally, each IRIS Audit Team shall comprise:

- At least one qualified and experienced “Registered IRIS Audit Team Leader” (See below)
- At least one team member with demonstrable knowledge and understanding of labour migration and recruitment regulations and issues related to migrant workers in given origin and destination countries

Additionally, as deemed appropriate by the Audit Company and Registered IRIS Audit Team Leader, the Audit Team Leader may be augmented and assisted by:

- Additional auditor(s) qualified and experienced at (at least) the level of “Registered IRIS Auditor”
- Additional technical expert(s) (non-auditor) to support and advise as a subject matter expert on IRIS related issues (for example: a recruitment regulatory expert). Such technical expert may provide advice to the audit team for the preparation, planning or audit, but shall not act as an auditor in the audit team, and shall be accompanied by an auditor at all times.

Note: This document and the IRIS Scheme General Requirements make reference to the term “Audit Team Leader”. This refers to a functional role in an audit team, not a qualification or position. The role of Audit Team Leader may be undertaken by either an “Registered IRIS Audit Team Leader” or (for training and mentoring purposes) by a “Registered IRIS Auditor” under the direct supervision of an Registered IRIS Audit Team Leader.

3.4. Registered IRIS Audit Team Leader - Experience and Competence Requirements

Persons qualified at the grade of Registered IRIS Audit Team Leader are recognized as competent to assume responsibility for Leading IRIS Audits/Audit Teams and various other certification and audit functions assigned to the role of “Audit Team Leader” in this and other IRIS scheme documents. A Registered IRIS Audit Team Leader is registered at this grade by IRIS Scheme Manager in accordance with requirements specified in the table below.

Table 3.4 Registered IRIS Audit Team Leader - Experience and Competence Requirements

Registered IRIS Audit Team Leader Grade Prerequisites (Unless otherwise stated)*	
Education Level:	Post-Secondary Degree / Diploma (or equivalent)
General Work Experience:	> 5 years
Audit Work Experience:	> 3 years Management System Audit experience (or equivalent) AND > 10 Management System Audits as Audit Team Leader (Lead Auditor)
Social Compliance Audit Work Experience:	> 1 year Social Compliance Audit experience AND > 10 Social Compliance Audits as Audit Team Leader (Lead Auditor)
IRIS Auditor Qualifications:	Completion of 1-hour online IRIS Recruiter Training Course

	Successful completion of IRIS Auditor Training Course recognized by IRIS Scheme Owner and IRIS Scheme Manager**
Labour Recruitment Sector Experience – Initial Requirements:	> 30 Days of days of validated IRIS audit experience; including > 10 days of validated IRIS audit experience acting as “Audit Team Leader”
Labour Recruitment Sector Experience – Maintenance Requirements:	> 10 days of validated IRIS audit experience within prior three year period
Continuing Professional Development:	> 12 Hours Per Year (Structured Learning)
IRIS Technical knowledge:	Demonstrable knowledge and understanding of the application IRIS Standard, IRIS Scheme and associated requirements relevant to geographic scope of work undertaken.

**Note: During the current IRIS Certification roll out phase, the IRIS Scheme Manager may, on a case by case basis, grant limited-time ‘interim approval’ exceptions to auditors.*

***Note: At the present time, the only recognized IRIS Auditor Training Course is the one delivered by ESC International on behalf of IRIS.*

3.5. Registered IRIS Auditor - Experience and Competence Requirements

Persons qualified at the grade of Registered IRIS Auditor are recognized as competent to assume responsibility for participating in IRIS Audits and assisting Registered IRIS Audit Team Leaders in the performance of their duties. A Registered IRIS Auditor is registered at this grade by IRIS Scheme Manager in accordance with requirements specified in the table below.

Table 3.5 Registered IRIS Auditor - Experience and Competence Requirements

Registered IRIS Auditor Grade Prerequisites (Unless otherwise stated)*	
Education Level:	Post-Secondary Degree / Diploma (or equivalent)
General Work Experience:	> 5 years
Audit Work Experience:	> 1 year Management System Audit experience (ISO 14001; ISO 9001; ISO 45001; SA8000; or equivalent) AND > 10 Management System Audits as Team Auditor (or Audit Team Leader)
Social Compliance Audit Work Experience:	> 1 year Social Compliance Audit experience AND > 10 Social Compliance Audits as Team Auditor (or Audit Team Leader)
IRIS Auditor Qualifications:	Completion of 1-hour online IRIS Recruiter Training Course

	Successful completion of IRIS Auditor Training Course recognized by IRIS Scheme Owner and IRIS Scheme Manager**
Labour Recruitment Sector Experience – Initial Requirements:	> 10 days or 3 full certification/rectification audits (post IRIS auditor training) of validated IRIS audit experience as a non-participating observer
Labour Recruitment Sector Experience – Maintenance Requirements:	> 10 days of validated IRIS audit experience within prior three year period
Continuing Professional Development:	> 8 Hours Per Year (Structured Learning)
IRIS Technical knowledge:	Demonstrable knowledge and understanding of the application IRIS Standard, IRIS Scheme and associated requirements relevant to geographic scope of work undertaken.

**Note: During the current IRIS Certification roll out phase, the IRIS Scheme Manager may, on a case by case basis, grant limited-time ‘interim approval’ exceptions to auditors.*

***Note: At the present time, the only recognized IRIS Auditor Training Course is the one delivered by ESC International on behalf of IRIS.*

3.6. IRIS Program Manager - Experience and Competence Requirement

Individual (or pair of individuals) who is/are recognized as meeting "IRIS Program Manager" competence, experience and maintenance requirements (see below). Appointed by Audit Company top management (refer to ISO/IEC 17021 -1 Clause- 6.1 and IRIS General Requirements 5.1.1). IRIS Program Manager:

- is authorized to coordinate and oversee the entire scope of AC's IRIS certification activities
- Is specifically responsible for meeting IRIS certification decision making structure and authority (IRIS General Requirements 5.1.1)
- maintains overall executive responsibility for the entire scope of AC's IRIS certification activities
- maintains responsibility for communications with SAAS for all matters pertaining to IRIS accreditation
- is authorized to monitor and qualify other IRIS auditor and allied expert personnel as meeting required competence/maintenance requirements (above).

Note: If the IRIS Program Manager is a shared function then

- *the responsibilities of both individuals SHALL be clearly described (for example, in the relevant job descriptions).*
- *one SHALL be responsible for the quality of the IRIS audits performed by the AC and have held previously the role of Senior Lead Auditor.*
- *the second individual SHALL be responsible for SAAS Accreditation and have a minimum of 3 years’ demonstrable experience in dealing with accreditation matters in depth knowledge of ISO17021 or ISO17020 or ISO17024 or ISO17065 Accreditation Programs.*

Table 3.6. IRIS Program Manager - Experience and Competence Requirements

Registered IRIS Program Manager Prerequisites (Unless otherwise stated)*	
Education Level:	<p>Individuals designated as "IRIS Program Manager" shall have met all audit, training, and experience requirements for IRIS Lead Auditor.</p> <p>In addition individual shall have demonstrated familiarity with IRIS accreditation requirements (ISO/IEC 17020, ISO 17021, 17025)*</p>
General Work Experience:	
Audit Work Experience:	
Social Compliance Audit Work Experience:	
IRIS Auditor Qualifications:	
Labour Recruitment Sector Experience – Initial Requirements:	
Labour Recruitment Sector Experience – Maintenance Requirements:	
Continuing Professional Development:	
IRIS Technical knowledge:	

-
- **Note: During the current IRIS Certification roll out phase, the IRIS Scheme Manager may, on a case-by-case basis, grant limited-time 'interim approval' exceptions to auditors.*
- ***Note: At the present time, the only recognized IRIS Auditor Training Course is the one delivered by ESC International on behalf of IRIS.*

4. Audit Effort Protocol

4.1. Minimum Audit Effort Considerations

The tables below define minimum required audit effort based on the number of workers and the number of employer contracts pertinent to a Labour Recruiter.

- Rates are for initial quotation only - changes to Labour Recruiter operations shall result in pro-rata modifications to the auditor-day effort required within the Certification Plan
- Rates assume ZERO time spent following-up on nonconformity issues. Additional time is usually necessary when follow-up of previously issued nonconformities is required during an audit.
- Audit Company shall advise Labour Recruiter in advance, in writing, of additional expectations and anticipated charges to perform audit activities which require additional auditor-day time, including:
 - follow-up of nonconformity issues
 - changes to scope and/or complexity of Labour Recruiter Operations.

4.2. Audit Effort Calculation Tables

In order to calculate* the total effort required for an Initial Certification Audit, the Audit Team Leader shall add the requisite number of auditor days from tables 4.2a and 4.2b. In order to calculate the total effort required for Surveillance Audit, the Audit Team Leader shall add the requisite number of auditor days from charts 4.2c and 4.2d.

Note: SAAS has provided a '[Certification and Audit Effort Tool](#)' to assist with consistent calculations.

Table 4.2a – Minimum Initial Certification and Recertification Baseline Audit Days (Every 24 months)

Total #'s of Workers Currently Deployed – in all countries.	Stage 1 Off-Site Prep and Review	Stage 2 Labour Recruiter On-Site Audit (Basic)	Stage 2 Validation Sub-Audit (Basic)	Stage 2 Reporting	Initial Cert'n Basic Total (Min)
<1000	1	1	0.5	0.25	2.75
>1,000 <6,000	1.5	1.5	1	0.25	4.25
>6,000	1.5	2	1.5	0.25	5.25

Table 4.2b – Minimum Additional Initial Certification and Recertification Audit Days per Number of Employer Contracts

#'s of Employer Contracts		Additional Stage 2 Labour Recruiter On-Site Audit	Additional Stage 2 Validation Sub-Audit		Initial Cert'n Additional (Min)
0-10		0	0		0
10-50		.25	.25		0.5
50+		0.75	0.75		1.5

Table 4.2c – Minimum Surveillance Audit Baseline Audit Days (6 & 12 months etc.)

#’s of Workers Currently Deployed		Surveillance Labour Recruiter On-Site Audit	Surveillance Validation Sub-Audit	Surveillance Reporting	Surveillance Basic Total (Min)
<1000		1	0.5	0.25	1.75
>1,000 <6,000		1.25	0.75	0.25	2.25
>6,000		1.5	1	0.25	2.5

Table 4.2d – Minimum Additional Surveillance Audit Days per Number of Employer Contracts

#’s of Employer Contracts		Additional Surveillance Labour Recruiter On-Site Audit	Additional Surveillance Validation Sub-Audit		Surveillance Additional (Min)
0-10		0	0		0
10-50		.25	.25		0.5
50+		.75	.75		1.5

5. Labour Recruiter Office Sampling Protocol

5.1. File Sampling Requirements

5.1.1. Sampling of Employer Agreements During Certification and Recertification audits* – (Top Level Sampling)

During certification and recertification audits, as a minimum, the Audit Team Leader shall ensure review and evaluation of:

- All IRIS audit tool indicators for not less than one current, or recent, Employer Agreement (“Job Order”) from each country of origin AND each country of destination currently or recently** serviced by the Labour Recruiter
- Sampled IRIS-related indicators related to additional Employer Agreements (“Job Orders”) currently or recently** undertaken by the Labour Recruiter in accordance with the following table (Based on the square root of the total number of agreements).

Total Number of current/recent Employer Agreements	Minimum Additional File Sample for Review
<5	All
5-25	5
26-50	7
51-100	10
100-200	14
>200	Square root of total number of current/recent employer agreements

- Both current and (where available) recently** completed Employer Agreements.
- A sufficiently large sample of files to provide reasonable and representative assurance of conformity across the range of agreement profiles (size, job disciplines, countries of destination, follow-up of nonconformities and/or previously identified areas of weakness or uncertainty, agreement status [e.g. prospective, new, amended, current recently completed], higher risk agreements, continual improvement actions, etc.) to provide reasonable assurance of conformity.
- Confidential records of Employer Agreements reviewed and the results of the review shall be maintained by the Audit Team.

** Note: This requirement not applicable for surveillance audits (See below).*

*** Note: ‘Recently’ in this context shall mean completed/closed within the prior two years.*

**** Note: Additional sampled Employment agreements are selected in accordance with the Certification Plan and, under most circumstances, shall focus on high or higher risk destinations . Reference should be made to the history and experience of the Audit Company, IRIS related organisations, relevant indices such as the [ITUC Global Rights Index](#) the [WGI](#) and similar country risk indicators and other sources (see section 8, below)*

Example – the Labour Recruiter deploys workers to 4 countries and has a current total of 11

Employer Agreements. 4 Employer Agreements shall be reviewed in their entirety AND a further 5 (per table) shall be reviewed for appropriately chosen indicators.

5.1.2. Sampling of Employer Agreements During Surveillance Audits

During surveillance audits, the Audit Team Leader shall at his/her discretion employ risk-based agreement file sampling that most efficiently and effectively fulfils the Certification Plan. The Audit Team Leader shall ensure review and evaluation of:

- A sufficiently large sample of files to provide reasonable and representative assurance of conformity across the range of agreement profiles (size, job disciplines, countries of destination, follow-up of nonconformities and/or previously identified areas of weakness or uncertainty, agreement status [e.g. prospective, new, amended, current recently completed], higher risk agreements, continual improvement actions, etc.) to provide reasonable assurance of conformity.

5.1.3. Sampling of Worker Files within Employer Agreements – (Second Level Sampling)

In reviewing the Employer Agreement sample selected in accordance with requirements above, the Audit Team Leader shall ensure review and evaluation of:

- An appropriate sample of IRIS-related indicators (in worker files) in accordance with the following table (Based on 0.6 x the square root of the number of workers deployed under the agreement)

Number of Workers Deployed under the Agreement	Minimum Worker File Sample for Review
<5	All
5-25	3
26-50	4
51-100	6
100-200	8
200-400	12
400-900	18
>900	0.6 x Square root of number of workers deployed under the agreement

- A sample representative cross-section (job discipline, worker demographics. etc.) of workers deployed.
- A sufficiently large sample of files to provide reasonable assurance of conformity

Confidential records of the ‘cross-section profiles’ of worker files reviewed and the results of the review shall be maintained by the Audit Team.

** Note: Sample should be rounded up to next whole number. Where the total number of workers deployed is fewer than 9, a minimum of 3 worker files (where available) shall be sampled.*

Example – 174 workers (154 nurses and 24 paramedics) are being deployed to KSA. Worker files Sample size is 8 worker files (per table). Of the eight worker files chosen, seven may be nurses and one may be a paramedic. The selection should also be representative of gender, age and other demographic differentiators.)

6. Validation Sub-Audit (VSA) Protocol

6.1. VSA Overview

(Refer to IRIS General Requirements paragraphs 1.3, 4.2 and 4.3)

This protocol is provided to assist an Audit Team Leader in planning, managing and conducting Validation Sub-Audits (VSAs). By following the recommendations below, (with reference to the Audit Company's Certification Plan, the Labour Recruiter's current Certification Scope, Protocol, and Management Systems [CSPMS] declaration, recent IRIS audit reports and other current and historic information that is reasonably available, the Audit Team Leader appropriately selects VSA methodologies to employ across the Labour Recruiter's Business Partners. Methodologies utilized and samples chosen for review SHALL reflect the degree of risk inherent in the operational structure, maturity and demonstrated performance (i.e. More robust VSA methodologies or multiple methods SHALL be employed where risks of nonconformity are higher).

6.2. VSA Elements:

6.2.1. Mandatory VSA elements (every scheduled audit – conducted in-person/on-site, or remotely, as planned)

- Interviews of Business Partner management personnel (wherever possible)
- Interviews of migrant workers currently deployed overseas

6.2.2. Additional VSA elements (planned and conducted as appropriate to Labour Recruiter risks – see 'sampling factors' below)

- Migrant worker interviews in country-of-origin (e.g. on-site at Labour Recruiter) and off-site via phone, video link or in person (as possible)
- Interview (phone or in-person) with Sub-Agent(s)
- Interview (phone or in-person) with local community representatives
- On-site Review of applicable procedures, practices
- Remote review of Business Partner procedures, practices and records (wherever feasible)
- Worker Surveys
- Other methodologies

Note: The Labour Recruiter is responsible for demonstrating conformity to requirements during the audit process. Typically, the Labour Recruiter has obtained the agreement of each Business Partner to reasonably cooperate with the Audit Team and to promptly provide the audit team with access to evidence requested. In some circumstances this may not be feasible (e.g. for regulatory or confidentiality reasons), in such cases the Labour Recruiter is obliged to demonstrate via alternative means that IRIS requirements have been met. The Audit Team Leader determines the adequacy (or inadequacy) of evidence presented in satisfying the relevant requirement(s) of the IRIS Standard and records his/her findings accordingly in the audit tool and report.

6.3. VSA Sampling

Total Number of Current/Recent Employer Agreements	Minimum Sample for VSA
<2	All
2-25	3*
26-100	5*
100-200	7*
>200	0.5 x Square root of total number of current/recent employer agreements*

**Where applicable, the audit team shall review a minimum one country-of-origin sub-agent.*

The sample of VSA's to be undertaken during each certification cycle shall be reasonably representative of the business profile and business risks of the Labour Recruiter. In selecting Business Partners for VSA sampling to be included in the IRIS Certification Program Plan (IRIS General Requirements paragraph 3.5 refers), or emergency adjustments, where needed, the Audit Team Leader shall consider the following risk factors:

- The degree of due diligence (oversight) demonstrable at the Labour Recruiter premises
- The Employer Agreement sample selected for this audit (5.1, above)
- The countries of origin
- The countries of destination
- The results of previous audits
- Information received from research, reports, media or other external sources

6.4. VSA Methodology Factors

Audit Team Leader shall refer to the risk information indicated within the CSPMS, the number and nature of agreements with Business Partners and contracts with workers, and the Labour Recruiter's level of conformity to IRIS Standard Principle B indicators.

6.4.1. Percentage of Migrant Workers

The percentage of migrant workers (deployed by Labour Recruiter) who have passed through a particular sub-agent / employment agency, or are employed by destination employer.

- Example: Origin country Labour Recruiter works with three employment agencies (Agency 1, 2 and 3) in a single destination country. Recruiter sends 20% of workers through Agency 1, 10% through Agency 2, and 70% through Agency 3. Because the majority of workers go through Agency 3, there is a higher risk associated with them. Auditors should consider this when planning and communicating VSA activities.

6.4.2. Due Diligence (Oversight)

The Level of, type, and result of due diligence (oversight) employed by recruiter over Business Partner.

- For example: Whether the Labour Recruiter has sufficient oversight, documentation, records or other evidence to demonstrate conformance with IRIS and human rights principles by said Business Partner(s).

Four categories of oversight methodology are identified as input criteria to assist the Audit Team Leader in determining an appropriate VSA sampling approach:

- **No Oversight** – Labour Recruiter employs no methods within the CSPMS matrix, makes no requirements under their contracts with Business Partners, and employs no methods of oversight consistent with IRIS indicators.
- **Low Oversight** – Labour Recruiter employs 1+ methods within the CSPMS matrix, makes a few requirements under their contracts with Business Partners, and employs few methods of oversight consistent with IRIS indicators.
- **Medium Oversight** - Labour Recruiter employs 3+ methods within the CSPMS matrix, makes sufficient requirements under their contracts with Business Partners, and employs sufficient methods of oversight consistent with IRIS indicators.
- **High Oversight** - Labour Recruiter employs 5+ methods within the CSPMS matrix, makes robust requirements under their contracts with Business Partners, and employs robust methods of oversight consistent with IRIS indicators.

6.4.3. Inherent Risk

The Inherent risk associated with Business Partner’s business and/or location. For example: Where migrant worker abuse is rampant, or “middle men” taking fees is commonplace, more robust forms of auditing shall be deployed. The Audit Team Leader shall consider:

- **Industry sector risks.** Such as the construction industry that has a history of migrant labor abuse.
- **Geographic Risks.** Reference should be made to the history and experience of the Audit Company, IRIS related organisations, and relevant indices such as the [ITUC Global Rights Index](#) the [WGI](#) and similar country risk indicators and other sources (see section 8, below)
- **Access to Remedy.** How realistic the workers’ access-to-remedy is in a given situation. If the migrant worker has no legal recourse for an abuse, then that worker is in a high risk situation.

6.5. VSA Methodology Determination

Audit company certification planning personnel and auditors shall use the tables below to assess inherent risks associated with the Labour Recruiter’s business partners and sub-agents. Based on the risk score achieved, a recommended level of review is presented in the table.

Prescribed review methodologies should be followed wherever feasible. Where logistical, cost, or other factors impact the ability to conduct in-person interviews, alternative remote review processes are typically acceptable. Where alternative methodologies or lower review thresholds are applicable, such decisions shall be documented and authorized by an IRIS Lead Auditor and the Audit Company’s IRIS Program Manager in the Labour Recruiter’s IRIS Certification Program Plan (IRIS General Requirements paragraph 3.5 refers). Should it become necessary to make an ‘emergency adjustment’ to VSA sampling or methodology during the conduct of an audit, such decision shall be similarly recorded, justified and authorized in the Audit Report by the Audit Team Leader.

Table 6.5 – Sampling Factors for Business Partners and Sub-Agents

% Migrant Workers	Level of Oversight	Inherent Risk
> 25% – 25 Points	None – 15 Points	High – 15 Points
15-25% – 15 Points	Low – 10 Points	Medium – 10 Points
1-14 – 10 Points	Medium – 5 Points	Low – 5 Points
	High – 0 Points	
Methodologies		
> 50 Points	On-site review of IRIS-related controls/results. Face-to face management interviews. Face-to face local community, CSO, NGO Interviews Face-to face worker interviews. (High Sample)	
20 – 50 Points	Off-site review of IRIS-related controls/results. Remote management interviews. Remote local community, CSO, NGO Interviews Remote worker interviews. (High Sample)	
1 – 19 Points	Off-site review of IRIS-related controls/results. Remote management interviews. Remote worker interviews. (Low Sample)	

7. Worker Interview Protocol

7.1. General

This section provides general guidelines for conducting worker interviews and outlines the minimum number of workers to be interviewed. It also provides guidance regarding some of the questions that may be asked during worker interviews.

7.2. Worker Interview Sampling

Based upon prior review of the Labour Recruiter's CSPMS, the Certification Plan and audit evidence previously collected, the Audit Team Leader is expected to use his/her discretion in planning for interviews and selecting an appropriate worker sample for interview. He/she is also expected to use knowledge of the current risks and conditions in determining the nature and type of questions needed to collect or triangulate audit evidence. When making such decisions, the Audit Team Leader shall (insofar as is practical) develop an interview sample which considers:

- The numbers of workers currently, typically, or soon-to-be deployed
 - from each Country of Origin (possibly also different communities of origin)
 - in each Country of Destination
 - in each industry sector and job type
 - at each Employer, and/or under specific Employer Service Agreements
- The demographics of workers currently, typically, or soon-to-be deployed
 - Age, race, ethnicity, community of origin, trade union membership, gender, sexual orientation, etc.
- The location and availability of workers for interview, including appropriate scheduling and communication media to be used for
 - Workers currently deployed
 - Workers preparing for deployment
 - Workers that have returned after an overseas deployment
- Previously collected audit evidence

7.3. Number of Workers to be Interviewed

Table 7.3 Number of Workers Interviewed for each VSA-Selected Agreement

Migrant Workers Currently Deployed Under Each VSA-Selected agreement	Minimum Number of Workers to be Interviewed during VSA (High Sample)	Minimum Number of Workers to be Interviewed during VSA (Low Sample)
1-10	3	1
11 – 50	5	2
51 – 200	8	4
200 - 500	12	6
500 – 1,000	18	9
1000 – 6,000	25	13
6000+	35	18

7.4. Interview Protocol Guidance

Worker interviews are used to:

- verify that specific indicators within the IRIS Standard (e.g. 1.2.2 – “Workers confirm that they have not been charged fees and costs...”) are being fulfilled.
- obtain information that may act as an indicator of issues that require further examination during review of Labour Recruiter’s management system, due diligence and Service Agreement (“Job Order”) processes and records.

A representative sample of workers shall be selected for interview by the Audit Team Leader without the influence of Labour Recruiter personnel. Interviews may be conducted via electronic media, where appropriate.

At least 50% of all interviews shall be conducted one-on-one with an individual worker (virtual or in person). Where appropriate, and at the Audit Team Leader’s discretion, group interviews (of no more than 5 workers per group), may be convened to conduct the balance of worker interviews.

Audit Team Leader shall ensure that (insofar as practicable) interviews are conducted in a confidential setting without any supervision or management personnel present. Special precautions shall be applied when an electronic (virtual) interview medium is used. To ensure appropriate sample selection and confidentiality for remote activities, independently proctored interviews should be used wherever practicable. If worker is a trade union member, a trade union representative shall be permitted to attend the interview at the request of the interviewee. Where doubt exists regarding the independence or veracity of information provided during worker interviews, the Audit Team Leader shall increase the level and depth of interviews in order to obtain more reliable evidence.

Confidential records of the ‘cross-section profiles’ of workers interviewed and the results of the interviews shall be maintained by the Audit Team.

The Auditor Team Leader shall ensure that interviewed workers are provided with both the Audit Team and IRIS Compliance Oversight Mechanism (COM) contact information for later confidential follow-up should the worker choose to take such action.

7.5. Interview Sample Questions

The questions listed below must not be used in the form of a questionnaire or auditor checklist, but provide IRIS auditors with helpful guidance and examples of the types of question which may typically be asked by an IRIS auditor. The questions below do not address all areas of the IRIS Standard or topics of possible inquiry. Auditors shall investigate IRIS-related issues as required by the audit plan, and as directed by the Audit Team Leader.

7.5.1. General Exploratory Questions

- How do you like it here?
- What don’t you like here?
- If you could change one thing here, what would that be?
- Can you please explain more about the issues?

- Recruitment fees: What fees or expenses did you encounter in getting this job?
- Working hours: How many hours do you normally work?
- Passport retention: Where is your passport? Can you access them? At any time? How?
- Deceptive work conditions: How is your situation different from what you were told at home?
- Dormitory: What is wrong at the dormitories? Is it far? How do you get there? Do you need to pay for dormitory or is it provided? How was/is it stipulated in your employment contract? Is it consistent what you were told before/during job interview?

Auditor should take note if any of the following are mentioned: Recruitment fees; Deceptive job conditions; Working hours; Dormitory; Salary payment; Salary deductions; Restricted movement; Physical abuse; Passport retention; Hard work; Working conditions; Health hazards; Isolation; Homesick.

7.5.2. Recruitment Process

- Can you please explain how you were recruited for this job?
 - What happened then?
- Were there any problems during the recruitment process?
 - How long did you wait?
- Did you sign a contract before departure? When? At which point in recruitment process?
 - How was it explained to you?
 - Are there any different conditions from what you were told before your departure?
 - Did you sign an additional contract in the destination country?
- What is the name of the recruitment agency?
 - Location?
- Name of Sub-Agents
 - How do you know the sub-agent?
- What services did the sub-agent supply?
 - Loan, passport, or transport?
 - How long did the sub-agent keep your passport?

7.5.3. Recruitment Cost

- Do you know what recruitment costs are?
 - Do you know how much your recruitment cost?
 - What costs are you aware of?
- Were you asked to pay for anything during recruitment process?
 - How much did you pay for the recruitment (total)?
 - Who did you pay?
 - When did you pay (at what stage)?
 - How did you pay?
 - Who else paid?
- Did you have to cover any expenses related to getting this job
 - Do you know what expenses/costs were paid in the recruitment process?

- Transportation/travel/visa/ payments to recruiters/agents/employers? before/during recruitment/after you arrived at the work place? Who paid for you?
 - Were there any last minute costs you were not aware of at the beginning?
- Did you have to take out a loan?
 - Interest rate:
 - Did you receive any receipts for these payments?
 - Are you still repaying the debt?
 - Do you receive less salary because of any deductions to repay any costs that occurred during recruitment?

7.5.4. Salary

- How about your salary? Any problems?
 - Nonpayment – late payment – no overtime payment – deductions
 - Do you have a pay slip that specifies the deductions?
 - How much of your salary are you able to send home?
 - Are there any transaction costs?

7.5.5. Working Hours

- How many hours do you usually work?
- How many hours of overtime do you usually work?
 - How are you paid for that overtime?
- Any problems regarding overtime?
- If/how is it different from what you were explained during recruitment and from what is stipulated in your employment contract?

7.5.6. Working and Living Conditions

- Is there anything that bothers you regarding working conditions at this site? Could you please explain what are you not happy about?
- Do you have any concerns related to your accommodation/living conditions? Are there any issues you would like to discuss/tell about regarding your accommodation/ living conditions? Anything specific? Anything different from what was explained to you during recruitment, job interview and described in your contract?
- Do you feel can leave the worksite and dormitory freely?
 - If no, what is the issue?
- Where is your passport and other identity documents? Do you have access to your passports and your documents?
 - If no, where are these? Do you know who holds them?
- Are you aware of how to terminate your contract?
 - If yes, do you know what process to follow?
 - Would you feel comfortable terminating your contract?
 - Is there anything that prevents you from leaving this place? If yes, what is it?
 - Are you aware of any co-workers who terminated their contract early? Why? How did they do it? Did they have to pay anything (e.g. travel)?
- Do you know how to complain if something is not right?

8. Audit Planning, Performance and Decision-Making (IRIS Audit Tool)

(Expanding upon IRIS General Requirements section 4.3)

8.1. Overall Planning of IRIS Audits

The Audit Team Leader shall ensure that each Audit Plan adequately and appropriately addresses all specific audit activities needed to evaluate conformity within the scope of the audit. In doing so, the Audit Team Leader shall consider and plan the appropriate sequencing of audit activities in a manner develops the audit team's incremental understanding and assurance of the LR's control, commitment and conformity. Under most circumstances, a plan structured as follows (this broad outline tailored to meet specific audit circumstances, logistics and timelines) would be appropriate:

- (Stage 1)
 - Establish understanding and adequacy of management policies and operational documentation (All IRIS Principles)
- (Stage 2)
 - Opening Meeting
 - Familiarization with LR's overall organizational structure (personnel); premises; and operational infrastructure (such as the use of computer programs; access to information; record retention; etc.).
 - Evaluation of agreements with Employers and their fulfilment by the LR. This includes all aspects of worker processing from solicitation of interest to follow-up after worker returns home. (Predominantly Principles 1-5).
 - Business partner and subcontractor due diligence. This includes Validation Sub-Audits. (Predominantly IRIS Principle B.2)
 - Respect for Laws and Fundamental Rights at work (Predominantly Principle A)
 - Management System Compliant with IRIS principles (Predominantly Principle B.1)
 - Preparation of audit findings and conclusions
 - Closing Meeting

8.2. IRIS Audit Tool

The IRIS Audit Tool aims to improve auditor consistency. It specifies the principal indicators and guiding indicators (audit evidence) to be examined and evaluated by the audit team in order to determine the LR's degree of conformity to the IRIS Standard principles and criteria. Although in the form of a 'checklist', its proper completion requires the audit team to:

- Adhere to a tailored audit plan designed to develop incremental understanding of audit evidence accumulated throughout the audit
- Apply the team's collective knowledge of recruitment processes and related factors

The IRIS Audit Tool is self-contained, incorporating guidance information to assist auditors' decision-making, and various (hidden) algorithms reflecting the IRIS Scheme Owner's prioritization of some audit indicators over others.

8.3. Use of the IRIS Audit Tool

The Audit Team Leader shall:

- consider and incorporate the IRIS Audit Tool elements into the audit plan (see 8.1, above)

- ensure that the IRIS Audit Tool is fully and appropriately completed to reflect all audit findings prior to the audit closing meeting
 - use the completed audit tool to determine audit findings and audit conclusions (see General Requirements sections 4.3.1.4 to 4.3.1.6) to be presented to the LR management at the closing meeting
 - maintain the completed audit tool as an audit record to demonstrate audit evidence reviewed and audit findings established (thereby supporting the audit report and any nonconformity/corrective action issues raised)
-

9. Audit Team Research and Understanding of Labour Recruiter Risks

9.1. Familiarity/Research Requirement

In order for IRIS Audits to be effective, efficient, and credible, audit team members and staff must not only be competent, but they must be well-informed.

Under the leadership of the IRIS Team Leader, IRIS Audit Team members are required to develop (from the perspective of interested parties) a thorough understanding of the risks and consequences of the Labour Recruiter's operations, and apply that understanding appropriately in the context of undertaking their audit duties (certification program planning/re-planning, audit preparation, audit delivery, audit findings, and audit reporting - especially planning/re-planning, evidence sampling, and determination of the appropriateness and adequacy of available evidence).

9.2. Information and Resources

Primary IRIS Scheme Resources

[IRIS Ethical Recruitment Tools and Resources](https://iris.iom.int/iris-tools-resources) (<https://iris.iom.int/iris-tools-resources>)

Secondary IRIS Scheme Support

iris@iom.int

Note: Additionally, the AC staff or Audit Team Leader should seek and identify additional country/ /location /industry resources (for example: Civil Society Organizations [CSOs]; Non-Governmental Organizations [NGOs]; Recruitment Trade Associations; Government Information) web-sites, publications, news feeds etc. Such useful resources should also be communicated to the IRIS Secretariat for possible inclusion in the collective IRIS Scheme Resources – please send emails to iris@iom.int -Thank You.

10.Document Revision Table

Revision Status	Changes introduced	Date of Change
Issue 1.0	Initial publication. Incorporates / updates / replaces information circulated in all prior drafts.	December 18, 2021