WORKER RIGHTS CONSORTIUM

Investigative Protocols

Introduction

These Protocols establish the framework of procedures, actors, methods, and substantive standards applicable to WRC Investigations of compliance with workers' rights. These Protocols are subsidiary to the WRC By-Laws and must be interpreted and implemented in compliance with WRC By-Laws.

In all of its Investigatory activities, including its decisions about which Investigations to undertake, the WRC shall act fairly, objectively, and without predisposition in favor of or against any party. WRC Investigations shall gather evidence and make findings not only of non-compliance with applicable labor rights and standards but also of compliance and particularly good practices by licensees and contractors, in the subject matters that are within the scope of Investigations.

I. General Objectives and Principles

The general objectives and principles guiding these protocols include the following:

A. WRC Investigations shall be undertaken by means and towards ends that are consistent with the Key Principles of the WRC.

B. A fundamental objective of WRC Investigations is to ensure compliance with the Codes of Conduct of the WRC and of WRC-Affiliated Universities. While seeking to achieve this objective, the WRC shall allocate its investigative resources to ensure compliance with those rights and standards contained in University and WRC Codes of Conduct that are given highest priority and urgency by the workers and communities whose interests and well-being are at stake.

C. WRC Investigations shall be undertaken through collaborative efforts among (1) local and regional groups, organizations, and advocates, (2) the U.S.-based staff, Board, and other personnel of the WRC and its Affiliated Universities, and (3) other individuals and organizations with expertise in labor-rights

compliance and in other relevant fields. In undertaking Investigations, the WRC shall seek the constructive engagement of licensees and contractors.

D. Collaborations in WRC Investigations shall be governed by the general principle that the WRC seeks to maximize the participation of local and regional actors, particularly the affected workers and communities, in WRC Investigations, while constructively engaging licensees and contractors, maintaining the highest methodological standards, reporting the most accurate evidence and analysis of compliance, and recommending the most effective remediation efforts, within the constraints of organizational resources and priorities. In light of this principle, the WRC shall seek concurrently to empower and strengthen the investigative capacity of local and regional actors.

E. WRC Investigations shall seek to gather, within the constraints of organizational resources and priorities, the most accurate, objective, and comprehensive evidence of compliance with rights and standards of the Codes of Conduct of Universities and the WRC.

F. Evidence gathered in WRC Investigations as well as appropriate analysis of the evidence shall be reported to the WRC Board of Directors, to Affiliated Universities, to students, to the affected workers, licensees, and contractors, to local organizations and advocates who participated or assisted in the Investigation, and to the public for purposes of assessing the extent to which the relevant licensees and contractors of Affiliated Universities are (1) actually complying with the Affiliated Universities' Codes of Conduct, and (2) actually complying or advancing toward compliance with the WRC Code of Conduct.

G. When WRC Investigative Reports conclude that parties have violated the Codes of Conduct of Affiliated Universities or of the WRC, the Reports shall make Recommendations of remedial actions necessary to achieve compliance with the relevant Code or Codes. WRC Investigations shall also report findings of compliance and particularly good practices by licensees and contractors, in the subject matters that are within the scope of the Investigations.

H. Investigations and Investigative Reports may also gather and report evidence regarding compliance with remedial Recommendations made in earlier WRC Investigative Reports and, when appropriate, may make new Recommendations of actions necessary to achieve compliance.

II. The Process of Initiating Investigations in Response to Complaints

A. *Complaining Parties:* Complaints alleging violations of the Codes of Conduct of Affiliated Universities or of the WRC may be filed by any party.

B. *Means of Submission*: Complaints may be verbal or written and may be submitted by telephone, fax, email, postal mail, or any other means of communication.

C. *Contents of the Complaint:*

1. The Complaint need not state the specific provisions of Codes, or any other legal rules or documents, that are allegedly violated. It is sufficient if the factual allegations in the Complaint constitute a violation of any provision of the Codes.

2. The Complaint shall state sufficiently specific allegations to ensure that the WRC may evaluate whether an Investigation of the Complaint should proceed, according to the standards set forth below in Section IV.

3. If a Complaint is submitted without such specific allegations, WRC staff may, in the exercise of their discretionary judgment, contact the party submitting the complaint or any other party in order to gather factual allegations that are sufficiently specific under Section II(C)(3).

D. *Evaluation of the Complaint: The Role of the Executive Director and the Board*

1. The Executive Director shall assess each Complaint submitted to the WRC and shall decide whether an Investigation should proceed, according to the standards set forth below in Section IV.

2. In making the decision whether to proceed with an Investigation, the Executive Director shall consider the information and views of interested parties, including affected or potentially affected workers and their communities, licensees, and contractors; local and regional organizations and advocates representing the interested parties; local specialists in labor law, labor relations, and other fields relevant to the potential Investigation; and may consult with such WRC staff, Board members, the three WRC Constituencies, and other parties as the Executive Director thinks helpful to her/his decision making.

3. Immediately after the Executive Director has made a decision whether or not to establish a Collaborative Investigative Team and to begin Investigative activities, but prior to the Executive Director's implementation of any such decision, the Executive Director shall report her/his decision – whether affirmative or negative – to the members of the Board and shall make available to the Board such information, documentation, or explanation, including a copy of any

written Complaint, sufficient to enable Board members to make a well-informed response pursuant to the next two provisions.

4. Any Board member may, in response to the Executive Director's reported decision, consult with the Executive Director in order to receive further explanation of the decision. In such consultation, the Board member may also seek to persuade the Executive Director to change his/her decision, provided that, if the Board member's consultation goes beyond seeking further explanation to advocacy of a change in decision, then the Board member will so notify all other members of the Board, to enable them to engage if they wish in consultation on the matter with the Executive Director or in discussions with other Board members, provided that, if any such Board member seeks to persuade the Executive Director to change his/her decision, the Board member will so notify all other members to enable them likewise to engage in the consultative process.

5. If the Executive Director decides to reverse his/her decision after any such round of consultations, she/he shall so report to all members of the Board.

6. Any Board member, after consultation with the Executive Director or reversal by the Executive Director of her/his decision pursuant to the two previous provisions, may call for a special meeting of the Board if the member wishes to seek a Board decision reversing the decision of the Executive Director as to whether or not to proceed with an Investigation.

7. The Executive Director or any Board member, if she/he deems it necessary to secure the effectiveness of a potential investigation, may request that any decision reported to the Board under paragraph 4, any consultation or discussion under paragraph 5, any call for a special meeting under paragraph 6, and any special Board meeting itself remain confidential to the Board, the Executive Director, and any staff identified by the Executive Director. During the process of reporting, consultation, or calling of a special meeting, the Executive Director's decision as to confidentiality shall apply. During the process of conducting the special meeting, the Board shall decide whether to maintain confidentiality.

III. The Process of Initiating Systemic or Spot Investigations.

A. The Executive Director and staff shall have authority to undertake such information-gathering, research, and analysis as the Executive Director deems necessary to enable the Executive Director to decide which systemic or spot Investigations the WRC should proactively undertake (that is, Investigations

that need not be triggered by a third-party complaint according to the procedures set forth above in Section II.)

B. If the Executive Director decides to initiate a Proactive Investigation, she/he shall report her/his decision to all members of the Board. The Executive Director and members of the Board shall then follow the same procedures for consultation, reversal of decision, and notice and conducting of a special meeting of the Board as set forth above in Section II (D)(2) *et seq.*

IV. Substantive Criteria for the Decision to Proceed with an Investigation.

The Executive Director and the Board shall apply the following criteria in deciding whether to initiate either a Complaint-triggered Investigation according to the process set forth in Section II above or a Proactive Investigation according to the process set forth in Section III above:

A. *Mandatory Threshold Criteria.* No Investigation shall proceed unless it meets each of the following two criteria:

1. There is reasonable cause to believe that a party has engaged in actions constituting a non-trivial violation of University Codes of Conduct or the WRC Code of Conduct, or there is good cause, based on the WRC's objectives and principles, to Investigate whether there is such reasonable cause in a particular facility or category of facilities.

2. There is substantial cause to believe that the workers who are or may be affected by an Investigation desire that the WRC initiate an Investigation.

   a. In the case of a Complaint-triggered Investigation, a Complaint submitted by affected or potentially affected workers shall suffice to establish such substantial cause.

   b. In the case of an Investigation initiated by a Complaint submitted by a party other than the affected or potentially affected workers, or in the case of a Proactive Investigation, the Executive Director shall rely on information provided by all parties, including local groups, organizations, and advocates, in determining whether there is such substantial cause. The expressed views of the affected or potentially affected workers and their communities shall presumptively establish whether there is substantial cause to believe that the affected or potentially affected workers desire that the WRC initiate an Investigation.

B. *Other Criteria that Shall be Weighed*. If the potential Investigation meets each of the two threshold criteria in the preceding subsection IV (A), then the following criteria shall be considered in deciding which Investigations should

proceed, that is, in deciding how WRC resources and time should be allocated among potential Investigations:

1. The relative importance of the substantive rights or standards which allegedly have been violated. In making this judgment about the prioritization of matters that are the subject of potential Investigations, primary consideration shall be given to the views of affected or potentially affected workers.

2. The relative severity of the alleged violation – that is, the degree of harm caused by the alleged violation of the rights or standards at issue. In making this judgment, primary consideration shall be given to the views of affected or potentially affected workers about the relative severity of the alleged violation.

3. The relative pervasiveness of the violation, that is, the relative number of workers, communities, factories, or regions allegedly harmed by the violation.

4. The relative probability that the potential WRC Investigation, if conducted, will result in actual remediation, or progress toward remediation, of any violations that may be found in the Investigation.

5. The degree to which, and the probability that, the potential Investigation, in addition to promising remediation of any violation, will concurrently empower and strengthen the capacity of local groups, organizations, and advocates, especially the affected workers and their communities, to participate in future WRC Investigations or to undertake future investigations and remediation conducted by the local parties themselves without WRC assistance.

6. The probability that the potential Investigation, in addition to promising remediation of violations and empowerment of local groups, will yield information, education, and constructive innovation serving the general purposes and activities of the WRC, including data-collection, extension and improvement of the WRC's networking activities, the WRC's constructive interaction with interested parties (including licensees and contractors), public disclosure and education about compliance with labor rights and standards, and improvement of other policies and practices of the WRC, including improvement of these Protocols.

V. The Composition of WRC Investigative Teams.

A. *Collaborative Investigative Teams.* WRC Investigations shall be undertaken by Collaborative Investigative Teams.

B. *Members of WRC Collaborative Investigative Teams.*

1. *Mandatory Members of Collaborative Investigative Teams.* The membership of each WRC Collaborative Investigative Team shall include at least one person from each of the following two categories:

    a. On-site workers or community members in the immediate locality or region of the workplaces to be investigated, and their local or regional individual or organizational representatives or advocates – *provided*, the membership of the Collaborative Investigative Team shall not include any current employee of the workplaces under Investigation, any individual whose conduct forms the factual bases of any allegation or matter under investigation, any family member of such employee or individual, or any other individual or organization that, in the determination of the Executive Director, has an interest in the Investigation that prevents that individual or organization from making accurate findings of fact or from drawing valid conclusions of violation.

    b. On-site or off-site staff or Board members of the WRC.

2. *Other Members of Collaborative Investigative Teams.* In addition to the mandatory personnel set forth in the preceding section V (A)(1), the WRC Collaborative Investigative Teams may also include the following parties, whether on-site or off-site:

    a. Local and regional organizations and advocates, in addition to those referred to in Section V (B)(1)(a) above, that meet WRC standards for collaborative work.

    b. Local and regional specialists in labor-law compliance, labor relations, human rights, empirical social-science methodologies, and other relevant fields.

    c. Organizations and advocates that meet WRC standards for collaborative work, based outside the locality or region

    d. Specialists in labor-law compliance, labor relations, human rights, empirical social-science methodologies, and other relevant fields, based outside the locality or region.

e. Members, representatives, or appointees of the three WRC Constituencies who are not members of the WRC staff or Board.

C. *Determination of the Composition of Particular Collaborative Investigative Teams.*

1. The WRC Executive Director shall designate the members of the particular Collaborative Investigative Team to undertake each WRC Investigation. The Executive Director shall determine both the number and particular individuals and organizations participating in each particular Collaborative Investigative Team. As to members selected from the categories enumerated in section V (B)(2), the Executive Director shall give priority to efforts seeking the inclusion of members from categories (2)(a) and (2)(b) – that is, local and regional organizations, advocates, and specialists – without prejudice to efforts to include members of the other categories of well.

2. If the Executive Director designates an organization as a member of a WRC Collaborative Investigative Team, the Executive Director shall request that the organization inform the Executive Director of the particular person or persons – and of any changes in the person or persons -- from that organization who will actually conduct activities pertaining to the WRC Investigation.

3. An organization or individual, by virtue of serving as a member of a WRC Collaborative Investigative Team, is not precluded from conducting, independent of the WRC team, investigative, reporting, and capacity-building activities related to the matters under investigation by the WRC team, so long as that organization or individual discloses to all interested parties and the public the activities for which the organization or individual serves as a member of the WRC Team and the activities for which the organization or individual is acting independently of the WRC Team – *provided* that no member of the Collaborative Investigative Team shall engage in such non-WRC activities on the same occasions when that member is engaged in WRC investigative activities; *for example*, no member shall engage in such non-WRC activities at a time when the Collaborative Investigative Team is afforded access to facilities for WRC investigative activities.

3. The Executive Director may change the size and membership of the Collaborative Investigative Team at any time during a WRC investigation.

4. In choosing the composition of each Collaborative Investigative Team, the Executive Director shall be guided by the WRC Key Principles, the Objectives and Principles of WRC Investigations set forth in Section I of these Protocols, and the criteria for allocation of WRC investigatory resources and time set forth in Section IV (B) of these protocols, and any other relevant principles, policies, and objectives duly authorized by the WRC.

D. *Determination of the Division of Activities among the Members of the WRC Collaborative Investigative Team.*

1. After full consultation with all members of a particular Collaborative Investigative Team, the Executive Director shall determine, at the start of each investigation, which members of the team shall be primarily, fully, or jointly responsible for the various activities comprising the Investigation (including, among others, the tasks of evidence-gathering, analysis of the evidence, making findings of fact, drawing conclusions as to violations, fashioning recommendations of remedial actions, preparing Investigative Reports and other public statements on behalf of the WRC, and constructively engaging with licensees and contractors).

2. In making this determination, the Executive Director shall be guided by applicable WRC principles and policies, including the principle of maximum local participation and the objective of empowerment and capacity building of local groups set forth in Section I of these Protocols.

3. Unless the Board chooses to exercise its general authority under the WRC By-Laws to override the Executive Director in particular instances, the Executive Director shall have final supervisory authority and responsibility for the content of all Investigative Reports -- including authority and responsibility for ensuring the accuracy of evidence, the precision of analysis of evidence, and the effectiveness of remedial recommendations -- that the WRC presents to Affiliated Universities and to other parties, including the public at large. This authority and responsibility does not preclude the Executive Director from assigning the task of preparing drafts of such Reports to particular members of the Collaborating Investigative Team or from adopting their drafts, after the Executive Director's review, as final Reports. To the contrary, in the process of preparing and finalizing WRC Reports, the Executive Director should again be guided by the principle of maximum local participation and the objective of empowerment and capacity-building of local groups set forth in Section I of these Protocols.

VI. The Activities and Methodology of WRC Investigations.

A. *The Flexible Scope of WRC Investigations.*

1. *Scope of Investigative Activities.*

a. The Collaborative Investigative Team assigned to a particular WRC Investigation may be charged with undertaking any or all of the Investigative activities enumerated in section VI (B).

b. In close consultation with members of each Collaborative Investigative Team, the Executive Director shall determine which of the activities enumerated in Section VI (B) each particular Collaborative Investigative Team is authorized to undertake on behalf of the WRC. In making this determination about the allocation of WRC time and resources, the Executive Director shall again be guided by the WRC Key Principles, the Principles and Objectives set forth in Section I of these protocols, and the criteria enumerated in Section IV (B) of these Protocols, including the principle of maximum local participation and the objective of empowerment and capacity-building of local groups.

c. The Executive Director, in close consultation with the Collaborative Investigative Team, may widen or narrow the scope its investigative activities as the Investigation proceeds based on evidence and facts found during the Investigation.

2. *Scope of Subject Matter Under Investigation*

a. *The Scope of Complaint-Triggered Investigations.* In close consultation with members of each Collaborative Investigative Team, the Executive Director shall determine, in the case of a Complaint-triggered investigation, which particular allegations in the Complaint are to be Investigated.

b. *The Scope of Proactive Investigations.* In close consultation with members of each Collaborative Investigative Team and guided by the WRC Key Principles, the Principles and Objectives set forth in Section I of these protocols, and the criteria enumerated in Section IV (B) of these Protocols, the Executive Director shall determine, in the case of a Proactive Investigation:

i. The subject matters to be investigated – that is, the particular labor standards and rights, compliance with which is to be investigated.

ii. The locations to be investigated – that is, the facility or facilities of one or more manufacturers or contractors whose compliance with the designated labor and standards shall be investigated.

c. *Additional Subject Matters.* In the course of its Investigation, each Collaborative Investigative Team

i. shall also gather, analyze, and report evidence, including evaluations by local organizations and individuals who participated in or assisted a WRC Investigation, sufficient to allow other or future WRC staff and Board members to assess the objectives, methods, and activities of the Collaborative Investigative Team and to assess local organizations that have been or may be found to meet WRC standards for collaborative work, in order better to fulfill the purposes of WRC Investigations and the WRC's general principles, policies, and objectives.

ii. may also gather, analyze, and report evidence that may be useful to the WRC's non-Investigative activities, including local capacity building, education, data gathering, and research relevant to the allocation of WRC resources between Investigative and other activities.

d. *Changes in the Scope of Ongoing Investigations.* In close consultation with a Collaborative Investigative Team and based on the evidence and facts found in the course of the Investigation, the Executive Director may determine that additional allegations in the Complaint, or allegations in new or amended Complaints pertaining to the same facility, facilities, or licensee under Investigation, or to the same substantive rights and standards under Investigation, or to the same events, conditions, or transactions under Investigation shall be subject to the ongoing Investigation.

B. WRC Investigative Activities and Methods Authorized by these Protocols

1. *Evidence-gathering.*

a. The Collaborative Investigative Teams may gather testimonial, documentary, survey and such other forms of evidence and empirical data as it sees fit.

b. The Collaborative Investigative Teams shall use methods of evidence- and data-gathering that are recognized as best practices in forensic and social science, toward the objective of gathering the most accurate and

comprehensive evidence and data, within the constraints of organizational resources and time allocated to the Investigation. Whenever feasible and effective, questioning and interviews of vulnerable parties shall be conducted by persons who have established relations of trust with the party. The best-practice methods of evidence- and data-gathering may include but are not limited to:

i. Specification of investigative subject-matter and objectives with sufficient precision to guide the Collaborative Investigative Team's selection of methods of evidence-gathering and data-collection, allocation of investigative resources across evidence-gathering and data-collecting activities, and formulation of site-specific plan to minimize interviewer, respondent, and sample selection bias.

iii. Close forensic questioning of all witnesses to specific alleged events that constitute specific alleged violations of Codes and law.

iv. Structured Interviews with the largest number and most randomly selected sample as is feasible, of witnesses to events or conditions affecting groups too large for close questioning of all eyewitnesses.

v. Corroboration of Structured Interviews through intensive Unstructured Interviews of the most knowledgeable and credible actors.

vi. Participatory Rural Appraisal or Rapid Rural Appraisal methods developed by the United Nations and the World Bank

vii. Collection of any relevant original documentation or data.

viii. Critical survey of existing secondary, scholarly, or journalistic reports, including reports that provide historical, economic, social, or cultural context that may aid in assessing the evidence as to more focussed events and workplace conditions.

2. *Analysis of Standards, Rights, and Evidence*. The Collaborative Investigative Teams may undertake an analysis of the evidence, including

   a. analysis of which events, if they truly occurred, would constitute violations of the rights and standards contained in University Codes of Conduct, the WRC Code of Conduct, and applicable domestic and international labor law. For this purpose, the Collaborative Investigative Team shall consult such local, regional, and other specialists in domestic and international labor law as necessary to reach precise and accurate conclusions about what facts are necessary to establish violations of law or Codes.

b. evaluation of the credibility and weight of conflicting evidence that is relevant to the events which, if they truly occurred, would constitute violations of such labor rights and standards.

3. *Findings.* The Collaborative Investigative Teams may undertake to resolve conflicts of evidence and make findings of fact and interpretations of applicable labor rights and standards – that is, final determinations about what events, relevant to the Investigation, actually occurred and whether those events constitute violations of applicable labor rights and standards. The Collaborative Investigative Team shall make findings not only of non-compliance but also of compliance and particularly good practices by licensees and contractors, in the areas which are the subject of the Investigation.

4. *Recommendations of Remedial Actions.* The Collaborative Investigative Teams may formulate Recommendations to any relevant parties about actions necessary to most effectively remedy failures to comply with the labor rights and standards that are the subject of the Investigation.

5. *Ongoing Investigation of Remedial Actions (Compliance Investigations).* After issuing any remedial Recommendations, the Collaborative Investigative Teams may conduct any of activities 1 through 4 in order to investigate whether parties are complying or have complied with those Recommendations or have otherwise undertaken effective remedial action.

6. *Investigative Reports.* The Collaborative Investigative Teams may write Investigative Reports for distribution to the WRC Board, Affiliated Universities, students, the affected workers and communities, organizations or individuals that participated in the Investigation, licensees, contractors and other relevant interested parties, and the public. Such Reports may cover any or all of the activities 1 through 5.

    a. The timing and subject-matter scope of Investigative Reports, and the number of such Reports issued in a particular WRC Investigation shall be determined by the WRC Executive Director in consultation with the Collaborative Investigative Team, subject to the authority and responsibility of the Executive Director set forth in Section V (D)(3) of these Protocols.

    b. Whenever feasible and as expeditiously as possible, Investigative Reports shall be translated into the language or languages of affected workers and communities.

C. Manner of Worker Interviews and Confidentiality of Interviewees

1. Collaborative Investigative Teams shall, whenever feasible, conduct interviews with workers outside the factory, in workers' home or other locations in their communities where workers believe they are able to speak most freely. Contact with workers for purposes of arranging interviews shall, whenever feasible, be made through parties other than the management of contractors and licensees and through intermediaries trusted by the workers, in such manner as reassures workers that the Collaborative Investigative Team is acting independently of the management of contractors and licensees.

2. The WRC shall strictly protect the confidentiality of the identity of workers who bring complaints, who are interviewed, or who provide documentary or other evidence to Collaborative Investigative Teams as well as the identity of any other vulnerable individuals or organizations. When the WRC discloses the contents of complaint, interviews, and evidentiary documents, it shall redact the names of workers and other vulnerable parties and any other information that may lead to the identification of the worker or party. The WRC shall relax these confidentiality requirements only when the worker or vulnerable party provides express written consent and when the WRC Executive Director concludes, based on his or her consultation with the worker or party and with knowledgeable local organizations and advocates or on reliable reports to the Executive Director of such consultations by the Collaborative Investigative Team, that disclosure of the worker's or party's identity will not expose the worker or party to reprisal of any kind.

D. Record-keeping and Ongoing Self-Evaluation

1. The WRC shall maintain complete records of the evidence, analysis, and reports produced by each Collaborative Investigative Team, including the evidence, analysis, and reports as to the subject matters set forth in Section VI (A)(2)(c) of these Protocols.

2. The WRC shall engage in continuing assessment and improvement of the effectiveness of its investigatory activities and of these Protocols.

E. Interpretation of University and WRC Code Provisions

1. WRC Investigations do not purport to be "comprehensive audits" of facilities, contractors, or licensees, which cannot realistically be completed in several days of private investigation. The WRC does not claim that several days of investigating or monitoring a facility or facilities can uncover evidence sufficient to determine whether the facilities are in compliance with all of the innumerable and complex rights and standards pertaining to freedom of association, collective bargaining, discrimination, occupational safety and health, wages and hours, and

other subject matters addressed in University and WRC Codes, domestic labor laws, and international labor laws. Nor does the WRC claim that it can reach well-grounded conclusions about all alleged violations of those innumerable rights and standards and all disputes over such rights and standards that may have occurred in the months or years since the facility was last monitored.

2. In light of the realities set forth in the preceding paragraph, WRC Investigations shall gather evidence and data relevant to those alleged violations and those disputes that are most important and urgent to the affected workers and communities, and shall make Recommendations of remedial action that most effectively redress such violations and most justly resolve such disputes.

3. In light of the realities set forth in paragraph 1, the WRC shall not promulgate "benchmarks" or "checklists" that purport to be applicable to highly variable local contexts and purport to yield comprehensive measures of compliance with the innumerable and complex rights and standards set forth in University Codes, the WRC Code, domestic labor law, and international labor law. For the guidance of licensees, contractors, and other interested parties, the relevant regulations, cases, and precedents of domestic labor law and international labor law provide the fine-meshed rules that give specificity to general rights and standards set out in more general terms in constitutions, legislation, treaties, and other controlling documents. These are the familiar sources of guidance to compliance officers seeking to comply with *rights and standards set out in public domestic and international law.* For the guidance of licensees, contractors, and other interested parties, the WRC shall maintain a compilation of its case-by-case interpretations and applications of the *rights and standard set out in University Codes and the WRC Codes*. In specific matters not yet addressed in the WRC's Investigative Reports or other WRC documents, the precedents established by the International Labor Organization may provide initial guidance about the specific requirements of such general rights and standards, although these precedents are subject to revision or adaptation by the WRC in its ongoing interpretation and application, in context, of the rights and standards contained in University Code and the WRC Code.