

**RSPO**

Roundtable on  
Sustainable Palm Oil



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# SOCIALISATION OF THE RSPO LABOUR AUDITING GUIDANCE

Workshops For Certification Bodies

January to May 2023

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Prepared by : Freda Manan, Senior Executive (Integrity), Assurance Division  
Reviewed by : Zaidee Tahir, Manager (Integrity), Assurance Division  
Approved by : Wan Muqtadir, Head (Integrity), Assurance Division  
Contact : integrity@rspo.org



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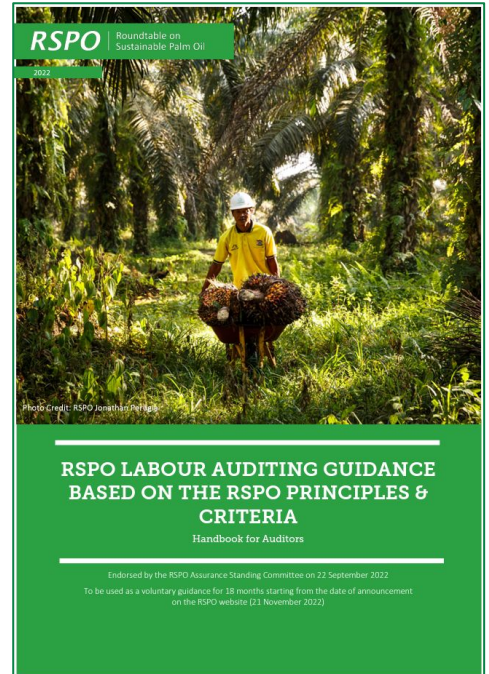


## List of Acronyms

|                |   |
|----------------|---|
| <b>AB</b>      | <b>Accreditation Body</b>                 |
| <b>ASC</b>     | <b>Assurance Standing Committee</b>       |
| <b>ASI</b>     | <b>Assurance Services International</b>   |
| <b>CB</b>      | <b>Certification Body</b>                 |
| <b>NC</b>      | <b>Non-Comformity</b>                     |
| <b>P&amp;C</b> | <b>Principles and Criteria</b>            |
| <b>PPE</b>     | <b>Personal Protective Equipment</b>      |
| <b>RSPO</b>    | <b>Roundtable on Sustainable Palm Oil</b> |



# Background



The RSPo Labour Auditing Guidance was developed in response to a call from stakeholders to enhance assessment components and improve auditors’ capacity to evaluate labour and other social aspects. The development process began in 2017 and involved several rounds of review and consultation with stakeholders. Initially named “RSPo P&C Social Auditing Protocol”, the title was later changed to “RSPo Labour Auditing Guidance” to align with the RSPo Principles & Criteria 2018. Despite difficulties caused by the COVID-19 pandemic, pilot test for the third draft document was successfully conducted by CBs alongside regular RSPo P&C audits.

The guidance document was then further strengthened based on the findings of the pilot test and underwent a final targeted stakeholder consultation. Ultimately, in September 2022, the Assurance Standing Committee (ASC) endorsed the RSPo Labour Auditing Guidance based on the RSPo Principles & Criteria 2018. The guidance is voluntary and intended to be used for 18 months beginning from the announcement date on the RSPo website (21 November 2022).

*The intent of the document is to improve **auditability of labour requirements** of the RSPo P&C and provide **certification bodies (CBs)** with a **clear methodology** that ensures a consistent system and approach to plan and execute RSPo P&C audits.*

## Objectives



Photo credit: RSPO

Following the announcement and publication of the RSPO Labour Auditing Guidance on 21 November 2022, the Secretariat organised a series of workshops for auditors from RSPO-accredited certification bodies.

The workshops aimed to fulfill the following objectives:

- 1** To socialise the RSPO Labour Auditing Guidance to auditors from RSPO-accredited certification bodies.
- 2** To promote the use of the voluntary guidance document among auditors to strengthen their labour auditing skills.
- 3** To simulate real audit scenarios to identify potential issues and provide auditors with guidance on addressing them.




## Details of the Workshops


In total, five workshops were conducted to facilitate the implementation of the RSPO Labour Auditing Guidance. Of these, four were held in-person for auditors in Indonesia, Malaysia, Ghana and Colombia while another was done virtually for auditors located elsewhere.




Photo credit: RSPO

 Swiss Belhotel, Bogor, Indonesia

 Thursday, 12 January 2023


 9 AM to 5 PM (GMT+7)


 27 participants


 20 Auditors  
2 Representatives from ASI  
1 RSPO-endorsed trainer  
4 Representatives from the RSPO Secretariat

*Note: This was a standalone workshop for the RSPO Labour Auditing Guidance.*




 Zoom meeting  
<https://zoom.us/j/97122640167>

 Thursday, 2 February 2023

 9 PM to 12 AM (GMT+8)

 112 participants

 104 Auditors  
5 Representatives from ASI  
3 Representatives from the RSPO Secretariat

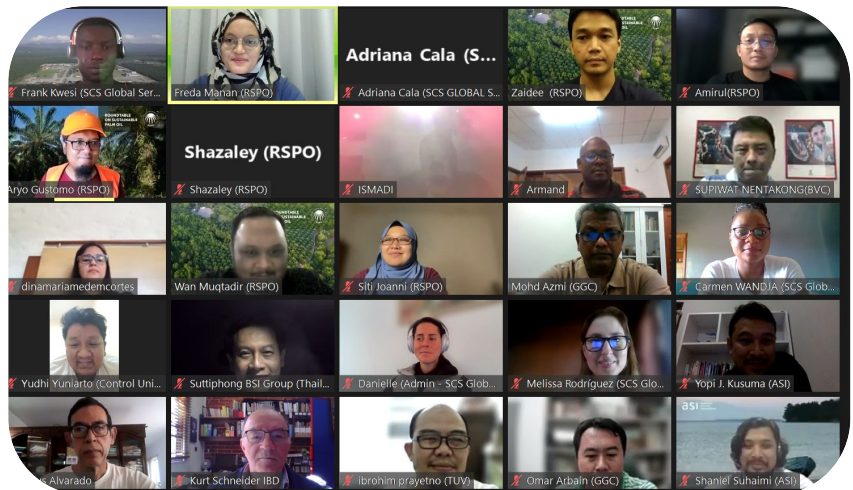
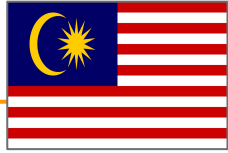


Photo credit: RSPO

*Note: This was a standalone virtual workshop for the RSPO Labour Auditing Guidance.*

## Details of the Workshops



Bangi Resort Hotel, Kuala Lumpur, Malaysia



Thursday, 16 February 2023



9 AM to 5 PM (GMT+8)



44 participants



28 Auditors  
3 Representatives from ASI  
6 Representatives from other stakeholder groups  
7 Representatives from the RSPO Secretariat

*Note: This workshop was part of the RSPO CB Interpretation Forum.*



Photo credit: RSPO



Mensvic Hotel, Accra, Ghana



Wednesday, 1 March 2023



2 PM to 6 PM (UTC+0)



14 participants



7 Auditors  
7 Representatives from other stakeholder groups

*Note: This workshop was part of the RSPO CB Interpretation Forum. English-French interpretation service was used during this workshop to ensure participants were able to fully grasp the information delivered by the presenters.*



Photo credit: RSPO

## Details of the Workshops



Double Tree Hotel, Bogota,  
Colombia



Tuesday, 23 May 2023



2 PM to 4 PM (GMT-5)



16 participants



13 Auditors  
3 Representatives from other stakeholder groups



Photo credit: RSPO

*Note: This workshop was part of the RSPO CB Interpretation Forum.*



## Presenters

The workshops were facilitated by three personnel from the Secretariat. They each provided comprehensive explanations of the RSPO Labour Auditing Guidance, guided participants through the practical exercises and actively engaged in responding to questions from the floor, delivering valuable insights and clarifications on the guidance.



Shazaley Abdullah  
Head, Certification



Wan Muqtadir  
Head, Integrity



Aryo Gustomo  
Director, Assurance

Photo credit: RSPO

## Agendas

As each workshop had a varying duration, adjustments were made to the agendas to ensure that each session was able to effectively convey the contents of the RSPO Labour Auditing Guidance while also actively engaging the audience. For instance, the virtual workshop included more time for Q&A sessions, while the in-person workshops involved more role play activities and group discussions.

### Workshop 1: Bogor, Indonesia

| Time             | Topic   | Presenter                                     |
|------------------|---|---|
| 8.00 - 9.00 am   | Participants' Registration  | Freda Manan, Zaidee Tahir                     |
| 9.00 - 9.05 am   | Welcome Remarks & Introduction  | Aryo Gustomo                                  |
| 9.05 - 9.15 am   | Part 1: Background, Application & Signing of Contract                               | Aryo Gustomo                                  |
| 9.15 - 9.30 am   | Part 2: Audit Planning - Preparation, Desk Review, Sampling Methodology             | Shazaley Abdullah                             |
| 9.30 - 10.30 am  | Role Play 1: Certification Proposal   | Aryo Gustomo, Wan Muqtadir                    |
| 10.30 - 10.45 am | Refreshments Break  |   |
| 10.45 - 11.25 am | Role Play 2: Initial Research   | Aryo Gustomo, Wan Muqtadir                    |
| 11.25 - 11.35 am | Part 2: Audit Planning - Stakeholder Consultation, Agenda                           | Wan Muqtadir                                  |
| 11.35 - 12.00 pm | Role Play 3: Audit Agenda   | Aryo Gustomo, Wan Muqtadir                    |
| 12.00 - 12.30 pm | Part 3: Audit Execution - Opening Meeting, Verification of Principle 6              | Aryo Gustomo                                  |
| 12.30 - 2.00 pm  | Lunch & Prayer Break  |   |
| 2.00 - 2.40 pm   | Role Play 4: Checklist  | Aryo Gustomo, Wan Muqtadir                    |
| 2.40 - 2.50 pm   | Part 3: Audit Execution - Site/Field Tour, Interviews with Workers, Closing Meeting | Shazaley Abdullah                             |
| 2.50 - 3.00 pm   | Part 4: Audit Reporting - Record-Keeping  | Shazaley Abdullah                             |
| 3.00 - 3.30 pm   | Role Play 5: Interviews   | Aryo Gustomo, Wan Muqtadir                    |
| 3.30 - 3.45 pm   | Refreshments Break  |   |
| 3.45 - 4.45 pm   | Role Play 5: Interviews (continued)   | Aryo Gustomo, Wan Muqtadir                    |
| 4.45 - 5.00 pm   | Q&A and Closing   | Aryo Gustomo, Shazaley Abdullah, Wan Muqtadir |

### Workshop 2: Online via Zoom

| Time     | Topic   | Presenter                                     |
|----------|---|---|
| 9.00 pm  | Welcoming Remarks & Introduction  | Aryo Gustomo                                  |
| 9.05 pm  | Part 1: Background, Application & Signing of Contract   | Aryo Gustomo                                  |
| 9.15 pm  | Part 2: Audit Planning - Preparation, Desk Review, Sampling Methodology   | Shazaley Abdullah                             |
| 9.40 pm  | Questions from Web Registration Form  | Aryo Gustomo, Shazaley Abdullah               |
| 9.55 pm  | Video Snippets from Bogor Workshop: Preparing Certification Proposal & Conducting Initial Research                                | Aryo Gustomo, Wan Muqtadir                    |
| 10.10 pm | Part 2: Audit Planning - Stakeholder Consultation, Audit Agenda   | Wan Muqtadir                                  |
| 10.30 pm | Break   |   |
| 10.40 pm | Part 3: Audit Execution - Opening Meeting, Verification of Principle 6, Site/Field Tour, Interviews with Workers, Closing Meeting | Aryo Gustomo                                  |
| 11.10 pm | Part 4: Audit Reporting - Record-Keeping  | Shazaley Abdullah                             |
| 11.20 pm | Questions from Web Registration Form  | Aryo Gustomo, Shazaley Abdullah               |
| 11.35 pm | Video Snippets from Bogor Workshop: Conducting Interviews   | Aryo Gustomo, Wan Muqtadir                    |
| 11.50 pm | Q&A Session and Closing Remarks   | Aryo Gustomo, Shazaley Abdullah, Wan Muqtadir |

## Agendas

### Workshop 3: Kuala Lumpur, Malaysia

| Time     | Topic   | Presenter                                     |
|----------|---|---|
| 9.00 am  | Welcoming Remarks & Introduction  | Aryo Gustomo                                  |
| 9.05 am  | Recap Day 2 of RSPO CB Interpretation Forum   | Shazaley Abdullah                             |
| 9.20 am  | Part 1: Background, Application & Signing of Contract   | Aryo Gustomo                                  |
| 9.35 am  | Part 2: Audit Planning - Preparation, Desk Review, Sampling Methodology   | Shazaley Abdullah                             |
| 9.55 am  | Exercise 1: Preparing Certification Proposal  | Aryo Gustomo, Shazaley Abdullah               |
| 10.30 am | Refreshments Break  |   |
| 10.45 am | Exercise 2: Conducting Initial Research   | Aryo Gustomo, Shazaley Abdullah               |
| 11.40 am | Part 2: Audit Planning - Stakeholder Consultation, Audit Agenda   | Wan Muqtadir                                  |
| 12.05 pm | Exercise 3: Preparing Audit Agenda  | Aryo Gustomo, Wan Muqtadir                    |
| 12.40 pm | Lunch & Prayer Break  |   |
| 2.00 pm  | Part 3: Audit Execution - Opening Meeting, Verification of Principle 6, Site/Field Tour, Interviews with Workers, Closing Meeting | Aryo Gustomo, Shazaley Abdullah               |
| 2.30 pm  | Part 4: Audit Reporting - Record-Keeping  | Shazaley Abdullah                             |
| 2.40 pm  | Exercise 4: Conducting Interviews (Preparation)   | Aryo Gustomo, Wan Muqtadir                    |
| 3.00 pm  | Exercise 4: Conducting Interviews (Presentation)  | Aryo Gustomo, Wan Muqtadir                    |
| 3.30 pm  | Refreshments Break  |   |
| 3.45 pm  | Exercise 4: Conducting Interviews (Presentation)  | Aryo Gustomo, Wan Muqtadir                    |
| 4.15 pm  | Q&A Session   | Aryo Gustomo, Shazaley Abdullah, Wan Muqtadir |
| 4.45 pm  | Feedback Session & Closing Remarks  | Aryo Gustomo                                  |

### Workshop 4: Accra, Ghana

| Time    | Topic   | Presenter                                     |
|---------|---|---|
| 2.00 pm | Part 1: Background, Application & Signing of Contract   | Aryo Gustomo                                  |
| 2.20 pm | Part 2: Audit Planning - Preparation, Desk Review, Sampling Methodology   | Shazaley Abdullah                             |
| 3.00 pm | Part 2: Audit Planning - Stakeholder Consultation, Audit Agenda   | Wan Muqtadir                                  |
| 3.20 pm | Exercise 1: Audit Proposal and Audit Agenda   | Aryo Gustomo                                  |
| 3.40 pm | Exercise 1: Presentation  | Wan Muqtadir                                  |
| 4.00 pm | Break   |   |
| 4.15 pm | Part 3: Audit Execution - Opening Meeting, Verification of Principle 6, Site/Field Tour, Interviews with Workers, Closing Meeting | Aryo Gustomo                                  |
| 4.45 pm | Part 4: Audit Reporting - Record-Keeping  | Shazaley Abdullah                             |
| 5.00 pm | Exercise 2: Role Playing Exercise   | Aryo Gustomo, Shazaley Abdullah, Wan Muqtadir |
| 5.45 pm | Question and Answers  | RSPO Team                                     |
| 6.00 pm | Closing Remarks   | All   |

### Workshop 5: Bogota, Colombia

*Note: Due to time constraints, the session was condensed into a 2-hour workshop aimed at familiarising participants with the guidance contents. The workshop included two practical exercises, focusing on the topics of Preparing Certification Proposal and Audit Agenda.*



# RSPO Labour Auditing Guidance Presentation

The primary objective of the workshops was to socialise the RSPO Labour Auditing Guidance by providing in-depth explanations of each section in the guidance document. The main contents of the workshops are shared below with selected snapshots of the slides presented to the participants.

## Part 1: Application and Signing of Contract

Gathering relevant information during the application stage is crucial for CBs to understand risk factors before conducting any RSPO audits. Information such as the supply base distribution, stakeholder list, and workforce details should be requested and considered to ensure adequate timing for all audit activities.

### 1.1 - 1.4 Application and Signing of Contract

|    |                            |   |
|----|----------------------------|---|
| 01 | Location (GPS Coordinates) | <ul style="list-style-type: none"> <li>Latitude &amp; longitude (degree, minutes or decimal)</li> <li>Addresses (mills and supply base)</li> </ul>  |
| 02 | Supply Base Maps           | <ul style="list-style-type: none"> <li>Demographics and understanding distance between locations</li> </ul>   |
| 03 | List of Stakeholders       | <ul style="list-style-type: none"> <li>Direct stakeholders</li> <li>Indirect stakeholders</li> <li>Governmental Agencies</li> <li>NGOs</li> </ul>   |
| 04 | Workforce Information      | <ul style="list-style-type: none"> <li>Total numbers</li> <li>Gender distribution</li> <li>Type of work</li> <li>Etc2. (follow document)</li> </ul> |

Review the above information thoroughly to ensure adequate timing for all audit activities. In general, allocate at least 20 minutes for each interview (excluding travel time and setup)\*

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## Part 2.1 - 2.2: Audit Plan Development

### 2.1 - 2.2 Audit Plan Development

|     |                                  |   |
|-----|----------------------------------|---|
| 15% | Management systems and processes | <ul style="list-style-type: none"> <li>Map applicability with RSPO Principle 6</li> <li>Understand recruitment and payroll process</li> </ul> |
| 25% | Worker and management interviews | <ul style="list-style-type: none"> <li><b>Sampling Methodology</b> </li> </ul>  |
| 15% | Audit programme                  | <ul style="list-style-type: none"> <li>Dates</li> <li>Locations</li> </ul>  |
| 30% | Roles and responsibilities       | <ul style="list-style-type: none"> <li>Audit team members</li> <li>Translator</li> <li>Interpreter</li> <li>Observers</li> </ul>              |
| 15% | Audit duration                   | <ul style="list-style-type: none"> <li>Based on no. of interviews, locations etc</li> </ul>   |

**Adapt plan to operational practicality and suitability and adhere to all health and safety precautions**

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During audit plan development, CBs should ensure all labour conditions and processes are captured. The lead auditor should consider requested documents, management systems, expected interviews, audit programme, roles and responsibilities, and adapt the plan for practicality and safety.

# RSPO Labour Auditing Guidance Presentation


## Part 2.3 - 2.4: Initial Research and Offsite Desk Review

During initial research for the audited Management Unit, factors such as vulnerable groups, history of complaints, and demographics of workers should be considered.

The CB should allow 1-2 days for desk review and request documents at least 2 months before the audit date.

### 2.3 Initial Research


- Conduct desk review to obtain **preliminary information** on the Management Unit that will be audited.
- Perform initial research via **digital and/or traditional sources** (e.g. web-based, newspapers, journals, social media).
- Record and maintain results** of the initial research for each Management Unit.




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### 2.4.1 - 2.4.3 Desk Review (Offsite)


- Initial research for the audited Management Unit should include:
  - Identified vulnerable groups
  - Past legal actions



• Allocate **1 - 2 assessment days** for desk review



- Request for information at least **two (2) months** before the audit.
- Management unit to respond at least **one (1) month** before the audit.
- If not, the **audit should be postponed** and action should be taken as per the CB's internal procedures and/or contract with the Management Unit.



- On-site audit should commence **within six (6) months** of the completion of the offsite desk review.
- If not, a **new offsite desk review** should be performed.


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## Part 2.5: Sampling Methodology

The audit team should select a representative cross-section of the workforce for sampling and control the selection to avoid coaching, using a formula based on the square root of total workers, and separately calculating vulnerable groups if identified during the on-site audit.

### 2.5.1 - 2.5.8 Sampling Methodology

- Ensure sampling represents a **cross section of the workforce** based on relevant demographic characteristics.
- Keep **control of sample selection**. Do it as late as possible - minimise risk of workers being coached.
- Calculate sample using this formula:  $x = \sqrt{N}$  (where **N= number of total workers**).
- Calculate a **separate sample** set by taking the square root of each identified **vulnerable group**.
- If vulnerable groups are identified during audit execution, request data on total number of identified vulnerable groups within the workforce. If they do not have such data, the auditor should interview the **identified vulnerable worker**.
- Workers chosen for interviews should represent **different types of workers**.
- Interview **50% of sampled workers individually and 50% in groups** (may be adjusted based on specific circumstances).
- Consider using a **translator(s) or interpreter(s)** who are independent of the Management Unit being assessed.



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# RSPO Labour Auditing Guidance Presentation

## Part 2.6: Stakeholder Consultation

Auditors are encouraged to conduct stakeholder consultations with those listed by the Management Unit and other relevant stakeholders based on their own risk evaluation. They should also maintain an updated list of stakeholders along with all written or verbal submissions, to be considered in their audit plans and explained in audit reports.

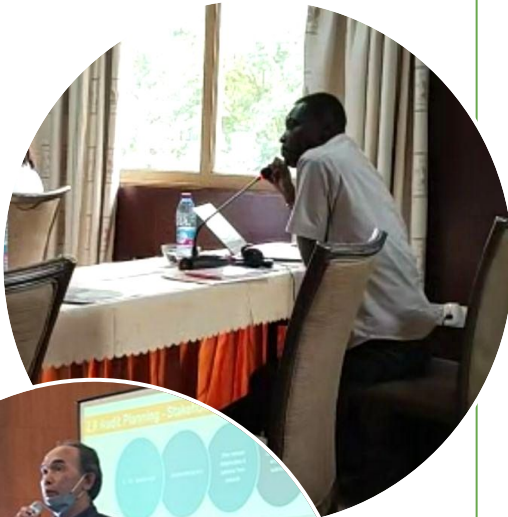


Photo credit: RSPO

### Findings

During this session, a few participants from each workshop were invited to share their experiences when conducting stakeholder consultations. A brief overview of their sharing is provided below:

- Lack of stakeholder engagement, resulting in a lack of input or feedback.
- Inadequate communication, leading to misunderstandings.
- Conflict between workers and companies, especially in the presence of local government officials.
- Monopolisation of talking time by certain officials, resulting in other stakeholders being unable to provide input.
- Women may not have the opportunity to speak due to cultural or societal barriers.
- Intimidation from stakeholders may create safety concerns, thus making it difficult for auditors to conduct consultations effectively.
- Certain stakeholders may reject auditors' requests for who should be involved in the consultation process.
- Certain issues encountered during stakeholder consultations may cause deviation from the original sample requirements.

## Part 2.7: Audit Agenda Preparation

Auditors should develop an audit agenda based on the outcome of the offsite desk review prior to conducting an on-site audit.

*Note: A practical exercise was conducted on audit agenda preparation (refer to page 19).*

# RSPO Labour Auditing Guidance Presentation

## Part 3.1: Opening Meeting

The audit team should follow generic requirements in the ISO/IEC 17021 series and RSPO P&C Certification Systems document and consider other aspects such as language needs, list of attendees, compliance with applicable laws, logistics and communication needs when conducting opening meetings.

### 3.1 Opening Meeting

#### General Requirements

- Follow ISO 17021/17065 series and the RSPO P&C Certification Systems document. In addition, consider the following:
  - Use **language** understandable by the majority. Consider translator/interpreter service.
  - Invite senior management, **personnel responsible** for key functions and processes e.g. payroll, recruitment, accounts, human resources and trade union/worker reps.
  - Inform the importance of attendance at the **closing meeting** and invite all key personnel.
  - Emphasise the need for openness, honesty and **transparency**.
  - Check and verify any **changes** from what has been communicated during the Application and/or Desk Review.



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## Part 3.2: Guidance for Verification of Principle 6

To ensure accurate and conclusive results, a triangulation methodology involving interviews, documentation review and site observations should be applied to assess conformance to Principle 6 of the P&C.

### 3.2 Guidance for Verification of Principle 6



- For Criteria 6.5 (*no harassment/abuse in the workplace and reproductive rights are protected*) and 6.6 (*no forms of forced or trafficked labour is used*), **cross-check documents** requested with the sampled interviewees.
- For Criteria 6.4 (*prohibition against child labour*), ask **probing questions** to distinguish between actual child labour, young workers conducting hazardous work, school absenteeism, and children who accompany parents (for non-working purposes).
- Observe workers' **reaction and gesture** to identify signs of fear, reluctance or hesitation towards answering particular questions.
- Auditors may randomly interview individual meeting attendees to confirm if the meetings were held and cross-check information in **meeting records**.
- Documents requested at the Offsite Desk Review stage may be **requested again** during audit execution.

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## Part 3.3: Site/Field Tour

### 3.3 Site/Field Tour

- Limit to a maximum of **two management representatives** to accompany auditors.
- Ensure strict compliance with **safety rules**.
- Be aware of **site traffic** conditions.
- Ensure all important areas are identified and covered. This includes
  - operation/production areas
  - store/warehouses
  - facilities and/or amenities provided for the workforce
- Evaluate the following aspects:
  - Understand the work being done at the audit site
  - Evaluate health and safety practices
  - Identify potentially vulnerable workers and/or family member(s) living in the Management Unit site
  - Observe management systems and practices, including atmosphere between management, supervisors and workers
  - Note any physical observable evidence related to P&C requirements.



This presentation is for the purpose of the Labour Auditing Guidance Workshop only. Always refer to the full document for official reference.

During site visit, auditors should limit the number of management representatives accompanying them, comply with safety rules, and cover all important areas while paying attention to aspects such as health and safety practices and identifying potentially vulnerable workers.

# RSPO Labour Auditing Guidance Presentation

## Part 3.4: Interviews with Workers

### 3.4 Interviews with Workers

Obtain information from workers to **corroborate facts** obtained from document review, discussions with management and staff, a review of physical conditions at the organisation and any other observations noted by the audit team.

#### Good Practices For Worker Interviews

1. **Set the context** of issues to be covered and read out relevant statements, exploring agreements or disagreements.
2. **Start with the least sensitive topics** first (such as health and safety), followed by the more sensitive (such as discrimination and sexual harassment) to create a safe space and build rapport.
3. To **discuss sensitive issues** during face-to-face interviews, open the discussion with topics such as their life experiences, before asking the more difficult questions.
4. Where necessary, **take breaks** during the interview and give workers time to collect themselves. Reinforce their coping strategies and let them know that they are **helping others** who may be going through similar experiences.



Source: Adapted from BSR Gender Data Impact Framework

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The audit team should develop an interview questions template for workers. The RSPO Labour Auditing Guidance provided reference for the verification of Principle 6 and recommended practices for worker interviews.

## Part 3.5: Closing Meeting

During the closing meeting, CBs are encouraged to present findings related to labour indicators, ensure the same attendees as the opening meeting and conduct it in a language understood by the majority, using a translator/interpreter service if necessary.

## Part 4: Audit Reporting

### 4.1 Audit Reporting

In addition to requirements of the RSPO P&C Certification Systems document, you should also include:

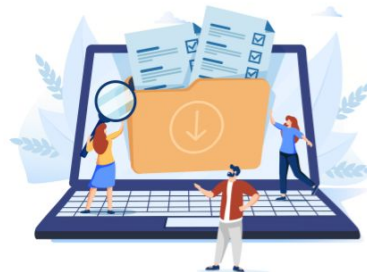
- A **record of interviews** conducted, including categories of workers spoken to and their genders; number of individual and group interviews; number of workers in each group; and location of interviews.
- A table indicating **number of workers**, job scope (field, non-field), gender (male, female) categories (permanent, full time, casual/ seasonal and day labour), local, transmigrant and migrant workers, **at the audit site**.
- The above table should include **workers** at each audited sites, such as mill, estates and supply base that are **covered under the scope** of the audit.
- Names of recognised **trade unions** at the audit site and **worker representatives** as well as how they are elected and their full names.
- The **current CBA** with the effective date and the period of validity.
- A table noting the number, types of **subcontractors** working site, nature of activities and the number of their workers.



This presentation is for the purpose of the Labour Auditing Guidance Workshop only. Always refer to the full document for official reference.

Among others, CBs should include a record of interviews and a table documenting the number of workers at each audited site in their report. All evidence should be maintained for at least one certification cycle.

### 4.2 Audit Record-Keeping



- The CB should **maintain all records of evidence** gathered during an audit. Pictures, audit notes, checklists, identity of workers interviewed and any other information collected from the audit site should be considered as audit evidence.
- Audit evidence should be available in the file of the Management Unit and should be kept for at least **one certification cycle** (5 years).

This presentation is for the purpose of the Labour Auditing Guidance Workshop only. Always refer to the full document for official reference.



## Practical Exercises

To fulfill the third objective of these workshops, i.e. to simulate real audit scenarios to identify potential issues and provide auditors with guidance on addressing them, the Secretariat designed several practical exercises. These exercises were only conducting during the physical workshops and modified to fit the context of each workshop.

### Exercise 1: Preparing Certification Proposal

#### Role Play 1 - Certification Proposal

|                        |                       |   |
|------------------------|-----------------------|---|
| RSPO Member Name       | AG Le Patron Pte. Ltd | <ul style="list-style-type: none"> <li>• Third-party provides operational service/non-processing activity (example transportation, independent storage, road maintenance, develop buildings etc) and/or supplies labour</li> <li>• More than 30% of labours are outsourced/ subcontractors/ non-permanent</li> <li>• Third-party is more dominant than other third-parties for one activity segment/sector or gets more than 30% allocation from total activities.</li> <li>• No agreement between the company and the third-party.</li> <li>• Third-party has not implemented occupational safety &amp; health measures or has social/labour issues</li> <li>• Third-party has been audited by the company against relevant indicators in RSPO P&amp;C standard or third party has not been audited by the company</li> <li>• Third-party does have not legal entity</li> <li>• Third-party has not carried out control measures related to the implementation of occupational safety &amp; health or social &amp; labour or environmental management.</li> <li>• The contractor is an RSPO-certified organisation that has documented procedures for outsourcing services within the scope of certificate.</li> </ul> |
| RSPO Membership Number | 2-0097-05-000-00      |   |
| Country                | Indonesia             |   |
| District               | Seruyan               |   |
| Total Hectarage        | 19,600 ha.            |   |
| Number of Supply Bases | 3                     |   |
| Number of Workers      | 587                   |   |
| Supply Chain Model     | MB                    |   |
| Other Source of FFB    | 1                     |   |

**Break into groups.  
Demonstrate how you prepare  
certification proposal for this  
company**

| Workers |     | Contractors |   | Total |
|---------|-----|-------------|---|-------|
| M       | F   | M           | F |       |
| 10      | 111 | -           | - | 121   |
| 10      | 108 | -           | - | 118   |
| 666     | 230 | -           | - | 896   |
| 597     | 220 | -           | - | 817   |
| 460     | 127 | -           | - | 587   |

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Information was extracted from real audit reports to come up with details on a fictional management unit for this exercise. Participants were then instructed to work in groups to prepare a certification proposal based on it.

### Findings

## 2 - 3

additional man-days on top of normal P&C audits when the RSPO Labour Auditing Guidance is implemented

## 20 - 23

total man-days for P&C audits when all recommended audit activities are accounted for

## High risk

elements such as vulnerable groups need to be considered in audit planning



Photo credit: RSPO

# Practical Exercises

## Exercise 2: Conducting Initial Research

**Exercise 2: Conducting Initial Research**

- You have 20 minutes to conduct research on the company that was assigned to your group below.
- Write down your findings on the flip chart paper provided.
- Take turns to present your findings (5 minutes per group).

| Group               | Group 1                  | Group 2               | Group 3        | Group 4           | Group 5             | Group 6                     | Group 7              | Group 8                |
|---------------------|--------------------------|-----------------------|----------------|-------------------|---------------------|-----------------------------|----------------------|------------------------|
| RSPO Member Company | PT Nabatindo Karya Utama | PT Farinda Bersaudara | PT Nabire Baru | PT Agro Kati Lama | PT Socfin Indonesia | PT Perkebunan Nusantara III | PT Ramajaya Pramukti | PT Wahana Prima Sejati |

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Random growers were selected from the RSPO Complaints Tracker. Participants were then tasked to conduct research on the companies assigned to their groups using all sources that they are familiar with.

*Note: Due to time constraints, this exercise was not included in the Accra workshop.*

## Findings



Photo credit: RSPO

In addition to official sources, familiarity with **social media** such as TikTok and Instagram helps auditors uncover other potential issues

**RSPO Complaints Tracker** is one of the main sources of reference for auditors when conducting research

Initial research helps auditors determine **additional info** and **documents** such as past NC records to be requested before the on-site audit



# Practical Exercises

## Exercise 3: Preparing Audit Agenda

### Role Play 3 - Audit Agenda

| Date            | Time           | Location          | Activities  |
|-----------------|----------------|-------------------|---|
| eg. 12 Jan 2023 | 10am - 10.45am | Estate 1 (Clinic) | <ul style="list-style-type: none"> <li>Interview with medical assistant &amp; nurses</li> <li>Verify records</li> </ul> |
|                 |                |                   |   |
|                 |                |                   |   |
|                 |                |                   |   |
|                 |                |                   |   |

Individually, please develop your audit agenda based on Role Play Exercise 1.

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Participants were given a template to develop their audit agenda based on the certification proposal prepared earlier in the workshop.

Two examples of handwritten audit agendas are shown. The first is a typed template with handwritten entries. The second is a more detailed handwritten agenda with columns for Date, Time, Location, and Activities, containing specific details for various dates and locations like 'Estate 1', 'Estate 2', and 'Estate 3'.

Samples of audit agenda preparation from the workshops

## Findings

1 - 2 days

were allocated for offsite desk review as recommended

Total interview time was calculated based on the recommended

20 mins

per interview

Trade union and gender committee

were the most often identified parties for stakeholder consultation

Participants are aware that labour auditing should only be conducted by

social auditors

# Practical Exercises

## Exercise 4: Preparing Checklist

Participants worked in groups to go through the checklist for Verification of Principle 6 in the RSPO Labour Auditing Guidance and come up with additional suggestions based on their auditing experiences.

Note: Due to time constraints, this exercise was only conducted in the Bogor workshop.

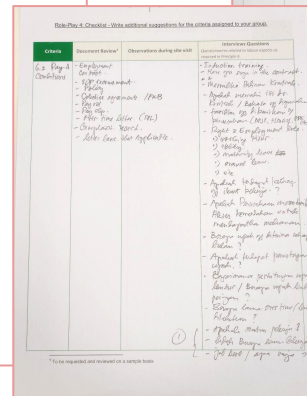
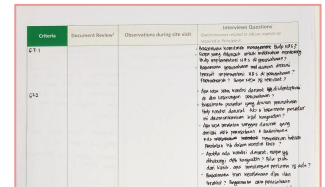
### Role Play 4 - Checklist

In addition to the Checklist given in the Labour Auditing Guidance, I would add more at...

Break into 4 groups. Then present your additional suggestions for the following:

- Group 6: 6.1 (Discrimination)
- Group 5: 6.2 (Pay & Conditions)
- Group 4: 6.3 (Freedom of Association & Collective Bargaining)
- Group 3: 6.4 (Child Labour)
- Group 2: 6.6 (Forced Labour) & 6.7 (Health & Safety)
- Group 1: 6.5 (Harassment and Protection of Reproductive Rights)

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## Findings

| Criterion  | Additional suggestions for interview questions on top of those provided in the Checklist for Verification of Principle 6  |
|--|---|
| 6.1 Discrimination                                 | <ul style="list-style-type: none"> <li>• Were there any strict requirements when applying for this job?</li> <li>• Are there differences in grievance responses between local and migrant workers?</li> <li>• Are you aware of any policy and procedures for job promotion here?</li> </ul> |
| 6.2 Pay and Conditions                             | <ul style="list-style-type: none"> <li>• Were you given any induction training?</li> <li>• Do you have a copy of your employment contract?</li> <li>• Does the management provide access to buy/get food?</li> </ul>  |
| 6.3 Freedom of Association & Collective Bargaining | <ul style="list-style-type: none"> <li>• Did the management intervene in the union election?</li> <li>• What is your opinion on the effectiveness of issues resolutions through the union?</li> </ul>   |
| 6.4 Child Labour                                   | <ul style="list-style-type: none"> <li>• What actions will be taken by the management if there is evidence of child labour?</li> <li>• Additional info/documents for review: school drop-out rate, NGO reports, clinic data</li> </ul>  |
| 6.5 Harassment & Protection of Reproductive Rights | <ul style="list-style-type: none"> <li>• Are you aware of the existence and functions of the gender committee?</li> <li>• Are female workers given maternity leave, if so, how many days?</li> </ul>  |
| 6.6 Forced/Trafficked Labour                       | <ul style="list-style-type: none"> <li>• Does your actual work match the descriptions provided by the recruitment agency?</li> </ul>  |
| 6.7 Health & Safety                                | <ul style="list-style-type: none"> <li>• Does the company have a record of all work-related accidents?</li> <li>• Are there any personnel identified to monitor the implementation of health and safety policy in the company?</li> </ul>   |

# Practical Exercises

## Exercise 5: Conducting Interviews

### Exercise 5: Conducting Interviews



1. Earlier today, we notified participants who were randomly selected as interviewees for this exercise.
2. For interviewees, cue cards were given to guide them on the roles they are going to play.
3. The rest of the participants will be divided into two groups. Each group will appoint auditors to conduct two of the interview situations below (3 auditors per interview).
4. You now have 20 minutes to prepare for the interviews.
5. For the purpose of this exercise, each interview session will be held for 15 minutes.
6. Please pay attention to each situation as we will conduct a review of this exercise later.

Situation 1: Interview with harvesters

Situation 3: Interview with mill workers

Situation 2: Interview with sprayers

Situation 4: Interview with management team

This presentation is for the purpose of the Labour Auditing Guidance Workshop only. Always refer to the full document for official reference.

Participants were randomly selected to role play the “workers” for each situation and given cue cards for their roles which include issues such as minor and undocumented workers, sexual abuse, drug use, insufficient PPE and intimidation. Similarly, a number of participants were tasked to role play the auditors, without knowing the issues experienced by each “worker”.

*Note: Due to time constraints, only two mock worker interviews were done in the Accra workshop, whereby one session was in English, and the other was in French.*



Photo credit: RSPO



# Practical Exercises

## Findings

- Auditors can develop interviewees' trust by:
  - Informing interviewees of their independence from the company, especially in remote locations where they may be required to travel in company vehicles.
  - Assuring workers that they will not face penalties, such as salary cuts, for the time spent on interviews.
  - Speaking in a friendly, less formal manner, using local dialect or slang if appropriate.
  - Sharing their phone number so interviewees can report any repercussions or provide additional information.
  - Limiting note-taking during interviews, particularly when handling highly sensitive information.
- Certain behaviours may indicate underlying issues within the management unit being audited:
  - Interviewees appearing unable to focus, displaying awkward behaviours, or seeming too tired.
  - Interviewees being overly quiet or defensive when asked questions.
  - One or more interviewees dominating the conversation and speaking over others.
- In situations where some interviewees display the behaviours mentioned above, auditors may need to conduct a one-to-one session with them.
- If a management representative interrupts an interview session, auditors must insist that they leave to provide privacy for the interviewees.
- During group interviews, auditors should ensure that they address all interviewees and avoid focusing solely on one person.
- Interviews also provide an opportunity for auditors to inform workers of their rights, for instance, when it comes to the provision of personal protective equipment (PPE) and the terms in their employment contracts.

## Video Sharing for Virtual Participants

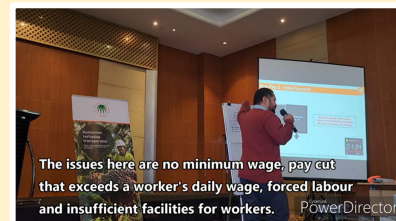
As practical exercises could not be carried out during the virtual workshop, the Secretariat provided the virtual audience with recorded snippets of the exercises from the Bogor workshop. These videos are accompanied by English subtitles and can be viewed through the links below:

### 1 Preparing Certification Proposal



<https://www.youtube.com/watch?v=MNDBpm3XbAk>

### 2 Conducting Initial Research



<https://www.youtube.com/watch?v=KaLn8ze-E74>

### 3 Conducting Interviews



<https://www.youtube.com/watch?v=b3DqCD3VKlw>

## Questions and Answers

At every workshop, the Secretariat ensured that participants were provided with an opportunity to address any queries pertaining to the information presented in the RSPO Labour Auditing Guidance. Selected questions and answers from the workshops have been arranged into various topics below.

### Pre-Audit Preparation

**Question:** Since auditors need to request employee data during the desk review, should companies identify vulnerable groups before the audit?

**Answer:** While auditors may use information gathered during the desk review to determine sampling and audit days, it is important to note that this information may not be comprehensive. Therefore, auditors should review the list of workers again during onsite audits to identify any vulnerable groups that may have been left out.

### Audit Duration

**Question:** Why is it important to conduct the onsite audit within six months after the desk review?

**Answer:** The information gathered during the desk review may become outdated if too much time passes before the onsite audit. For instance, the number of workers may have changed or new complaints may have arisen. By conducting the onsite audit within six months, auditors can ensure that they have the most up-to-date and accurate information possible.

**Question:** How do we convince clients about the additional man-days?

**Answer:** CBs need to highlight the benefits of implementing the RSPO Labour Auditing Guidance such as improving labour practices and protecting workers' rights, in order to get clients' approval. Through our practical exercises, it has also been proven that only two to three additional man-days are required to effectively implement this guidance.



## Questions and Answers

### Safety of Auditees

**Question:** How do auditors ensure auditees' safety especially after sensitive information has been revealed?

**Answer:** To minimise the risk of unintended consequences, auditors should limit note-taking and practice remembering important details from interviews. Additionally, auditors should manage their reactions and avoid appearing too surprised or expressing personal views on the situation. When requesting additional information from the management, auditors should consider involving more individuals in the request to avoid accidentally revealing the identity of informants. Ultimately, auditors should balance their obligation to provide accurate and reliable information with the need to protect the safety of auditees.

### Auditor Independence

**Question:** In situations where audit sites are located far away, and clients offer food and accommodation, how can auditors maintain their independence beyond just using their own vehicles?

**Answer:** When audit sites are located far away, auditors may need to consider practical solutions to maintain their independence. It is important to evaluate other factors such as accommodations and meals. Accepting these benefits from clients can create a perception of a lack of independence, and clients may use this to their advantage. To mitigate these risks, auditors should use their professional judgement and assess the potential impact of accepting certain assistance from the client and make a decision based on the facts and circumstances of the situation.

### Cost of Audit

**Question:** Who should bear the additional cost of transportation if the audit team was to make their own arrangement to the audit site?

**Answer:** Any additional costs should be discussed and agreed upon with the client beforehand. This could include costs associated with rental vehicles, fuel, tolls, or other expenses that are outside of the normal course of business. Auditors should clearly communicate the reason for the additional costs and ensure that the client understands the impact on the overall audit cost.

## Recommendations

Drawing upon the insights gained from the practical exercises and feedback provided by the participants of the workshops, there are several recommendations for the Secretariat to consider.

- Conduct a comprehensive review and analysis of the feedback collected from various parties during the 18 month trial period to determine the feasibility of making the RSPO Labour Auditing Guidance mandatory in the future.
- Emphasise the importance of conducting onsite audits within 6 months of the desk review, and provide guidance on how auditors can manage changes that occur during this time.
- Extend the socialisation of the RSPO Labour Auditing Guidance to RSPO grower members.
- Consider expanding the scope of auditors' independence beyond just vehicles, to include other factors such as fuel, accommodation and meals.
- Provide guidance for auditors on:
  - how to effectively communicate the benefits of proper labour auditing to the management unit being audited.
  - how to build trust with interviewees and effectively manage their reactions during interviews.
  - reasonable assistance that can be accepted from the management unit being audited in unavoidable situations.



Photo credit: RSPO

RSPO is an international non-profit organisation formed in 2004 with the objective to promote the growth and use of sustainable oil palm products through credible global standards and engagement of stakeholders.

[www.rspo.org](http://www.rspo.org)



**Roundtable on Sustainable Palm Oil**

Unit 13A-1, Level 13A, Menara Etika,  
No 3, Jalan Bangsar Utama 1,  
59000 Kuala Lumpur, Malaysia

**Other Offices:**

Jakarta, Indonesia  
London, United Kingdom  
Beijing, China  
Bogota, Colombia  
New York, USA  
Zoetermeer, Netherlands

 [rspo@rspo.org](mailto:rspo@rspo.org)

 [www.rspo.org](http://www.rspo.org)