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# RSPO LABOUR AUDITING GUIDANCE BASED ON THE RSPO PRINCIPLES & CRITERIA

Handbook for Auditors

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Endorsed by the RSPO Assurance Standing Committee on 22 September 2022

To be used as a voluntary guidance for 18 months starting from the date of announcement  
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## FOREWORD

This guidance document has been developed for Certification Bodies (CBs) that carry out RSPO Principle & Criteria (P&C) audits. This guidance supplements the existing RSPO Certification Systems document<sup>1</sup> and the P&C and is not applicable to Independent Smallholders (ISH).

The intent of this document is to improve auditability of labour requirements of the RSPO P&C and provide CBs with a clear methodology that ensures a consistent system and approach to plan and execute RSPO P&C audits. The document also aims to ensure that audits are performed on the principle of continuous improvement during the certification cycle and long-term sustainability when delivering RSPO P&C certification.

Development of this guidance has been done taking into consideration typical social, economic and cultural scenarios in agricultural plantations that grow oil palm and mills that extract palm oil globally. As this guidance is intended to have global applicability, CBs are advised to consider the practicality and appropriateness to the local context when using it.

The development process of this guidance document is as follows:



CBs should develop internal procedures consistent with this guidance and use the RSPO Certification Systems document and P&C as reference.

This document has been prepared by the RSPO Secretariat. We are grateful to all who have contributed to the development of this guidance by sharing their experiences, lessons learnt, and recommendations. We would also like to thank the Multi-Stakeholder Initiative, Certification Bodies (CB), Accreditation Body (AB), Consultants, Assurance Standing Committee (ASC), Standard Standing Committee, RSPO Human Rights Working Group and other members of RSPO, for their time and for providing their inputs.

<sup>1</sup> RSPO Certification Systems for P&C and ISH Standard

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# 1. APPLICATION AND SIGNING OF CONTRACT

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- 1.1. It is important for a CB to understand the demographic and factors that will contribute to the risk level for a Management Unit that intends to be certified under the RSPO Principles & Criteria. Therefore, it is crucial for the CB to gather relevant information during the application stage.
- 1.2. At the application stage, the CB should consider requesting (but not necessarily be limited to) the following as part of the information gathering process:
  - a. Location (GPS coordinates - latitude and longitude) and address of the Management Unit (including mills and supply base);
  - b. Distribution map and distances of the supply bases for the Management Unit;
  - c. List of stakeholders (i.e.. directly and indirectly affected stakeholders, interested parties, local authority, non-government organisation, local communities, workers' representatives, etc.);
  - d. Information of the workforce (i.e.. number of workers, job scope (field, non-field), gender (male, female) categories (permanent, full time, casual/ seasonal and day labour, and contract workers), local, transmigrant and migrant workers.
- 1.3. All of the above information should be reviewed and considered by the CBs when preparing the certification proposal to ensure adequate timing has been allocated to cover all audit activities such as field visits, documentation review, workers' interviews, and stakeholders consultation.
- 1.4. As a general guideline, the CB should estimate an allocation of at least twenty (20) minutes<sup>2</sup> (excluding duration between interviews and travel time) per sampled interviewees (i.e.. workforce/stakeholders) when allocating the assessment days on top of the other activities (i.e.. initial research, desk review, etc.).

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<sup>2</sup> This timeline is based on the suggestion from the result of field tests, and in comparison with similar social auditing standards. The CB is recommended to allocate adequate time for the interview session with the selected samples.

## 2. AUDIT PLANNING<sup>3</sup>

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- 2.1. At the audit plan development stage, the CB should pay special attention to specific requirements to ensure all labour conditions and processes are adequately captured in the entire audit process. The lead auditor should include or make reference to the documents and information requested during the Offsite Desk Review, as part of the consideration when planning for:
- a. Management systems and processes within the Management Unit applicable to Principle 6 (e.g. recruitment and payroll processes);
  - b. Expected number of worker and management interviews (Refer to Sampling Methodology);
  - c. Audit programme including dates and locations where the audit activities will be conducted;
  - d. Expected audit duration;
  - e. Roles and responsibilities of the audit team members and accompanying persons, such as translators, interpreters and/or observers.
- 2.2. The audit plan should be adapted to the operational practicality and suitability of the Management Unit being audited. This includes the health and safety risks that may apply to the audit team.

### 2.3. INITIAL RESEARCH - PREPARATION FOR DESK REVIEW

- 2.3.1. To obtain preliminary information on the Management Unit that will be audited, the CB is required to conduct a desk review. When preparing for the desk review, CB should conduct initial research via digital and/or traditional sources (e.g. web-based, newspapers, journals, social media, etc.).
- 2.3.2. Results of the initial research should be recorded and maintained for each Management Unit audited.
- 2.3.3. Initial research for the audited Management Unit should consider the following, but not necessarily be limited to:
- a. Information related to vulnerable groups<sup>4</sup> of workers;
  - b. Current or past legal actions;
  - c. History of complaints from recognised sources such as the RSPO website, NGO reports, etc;
  - d. Previous audit reports, if any;
  - e. Demographics and migration trends of workers in the region where the Management Unit is located;

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<sup>3</sup> The audit planning should be aligned with the requirements of Section 5.3 of the RSPO Certification System for Principles & Criteria 2020.

<sup>4</sup> Any group or sector of society that is at higher risk of being subjected to social exclusion, discriminatory practices, violence, natural or environmental disaster, or economic hardship than other groups, such as Indigenous Peoples, ethnic minorities, migrants, disabled people, the homeless, isolated elderly people, women and children. (Annex 1: Definition, P&C 2018).

- f. Languages spoken;
- g. National and regional laws that apply;
- h. Records of inspection from the Ministry of Labour or other applicable government agency/Ministry;
- i. Available living wage benchmark, if applicable, from the GLWC website<sup>5</sup>.

## 2.4 DESK REVIEW (OFFSITE)

- 2.4.1 The CB should consider allocating a minimum of one to two (1-2) assessment days to carry out the desk review.
- 2.4.2 The CB should request the Management Unit to provide the documents and information at least two (2) months before the agreed audit date. Management unit to respond to the request at least one (1) month before the agreed audit date. If the requested documents and information are not provided within the stipulated time frame, the audit should be postponed and action should be taken as per the CB’s internal procedures and/or contract with the Management Unit.
- 2.4.3 The on-site audit should commence within six (6) months of the completion of the offsite desk review. If this exceeds six (6) months, a new offsite desk review should be performed.
- 2.4.4 **List of information/documents to be requested from the Management Unit**  
The following information/documents should be requested (but not be limited to) prior to the on-site audit:

Details on Management Unit	Period <sup>6</sup>
Full name of the Management Unit and main site/office location, i.e.. address and GPS coordinates – latitude and longitude.	Latest
Full name of the Management Unit’s representative and contact details.	Latest
Number of sites (mill, estates and supply base) to be included in the scope of the audit, including information of any new supply base, mill machinery or processes.	Latest
Existence of other sites under the Management Unit’s operational control.	Latest
Full address of each site location (mill, estates and supply base), GPS coordinates - latitude and longitude, distance and travel time from the main site/office.	Latest

<sup>5</sup> <https://globallivingwage.org/resource-library/>

<sup>6</sup> For initial certification, surveillance and recertification audits, the duration is six (6) months prior to the current audit date (where duration has been specified).

Map(s) of the Management Units' premises that include(s) the following marked and highlighted:  <ul style="list-style-type: none"> <li>i. Clinics, hospitals and/or pharmacies</li> <li>ii. Palm oil mill and main/site office</li> <li>iii. Surrounding villages</li> <li>iv. School(s)</li> <li>v. Traditional market</li> <li>vi. Breastfeeding and childcare facilities</li> <li>vii. First aid equipment</li> <li>viii. Sanitation facilities (e.g. for workers applying pesticides)</li> <li>ix. Toilets</li> <li>x. Estate divisions and sections with names</li> <li>xi. Worker housing areas</li> <li>xii. Trade union office, where available</li> </ul>	Latest
Existing management systems certification if any (e.g. ISO series, OHS or other schemes)	Latest
<b>Management Unit's Management Systems, Policies, Procedures &amp; Records</b>	
<b>6.1 Discrimination</b>	
<ul style="list-style-type: none"> <li>• Non-discrimination and equal opportunity policy.</li> </ul>	Latest
<ul style="list-style-type: none"> <li>• The recruitment policy and procedure applicable to different types of workers. Please include information of (e.g. including recruitment fees or related costs and Management Unit's reimbursement procedure) where available.</li> </ul>	Latest
<ul style="list-style-type: none"> <li>• Documentation/records of Gender Committee structure, meetings, list of activities.</li> </ul>	6 months
<ul style="list-style-type: none"> <li>• Training programmes for workers and improvement opportunities for women.</li> </ul>	6 months
<b>6.2 Pay and Conditions</b>	
Employment and welfare-related policies and procedures [e.g. wage and benefits, collective bargaining agreement (CBA) if available, or company regulations on pay, housing, sanitation facilities, water supplies, medical, educational and welfare amenities].	Latest
Number of operational shifts in the mill.	Latest
Details regarding daily or seasonal quotas for workers during regular work hours.	6 months
Pay periods <sup>7</sup> for all categories of workers (permanent, full time, casual, temporary/ seasonal and day labour).	6 months
Number of workers who stay in worker housing provided by the Management Unit.	Latest

<sup>7</sup> The amount of time that a worker works before being paid. Pay periods are fixed and often recur on a daily or monthly basis.



Number of workers who stay outside the Management Unit (e.g. surrounding villages).	Latest
General calculation of the prevailing wage provided to workers (cost of housing/housing allowance, transport allowance, in-kind benefits, food, benefit and deductions).	Latest
<b>6.3 Freedom of Association and Collective Bargaining</b>	
Policies or published statements recognising freedom of association.	Latest
Minutes of Meetings held between the Management Units and Trade Union and/or workers representatives.	6 months
Records of meetings (e.g. photos of gatherings or activities).	6 months
<b>6.4 Child Labour</b>	
Policy for the protection of children, including prohibition of child labour and remediation.	Latest
Employment contracts and agency agreements.	Latest
Documentation/records of communication regarding the “no child labour” policy to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	6 months
<b>6.5 Harassment and Protection of Reproductive Rights</b>	
Policy to prevent sexual and all other forms of harassment and violence.	Latest
Policy to protect reproductive rights of all, especially of women.	Latest
Grievance mechanism Standard Operating Procedures (including procedures on remedial actions).	Latest
Documentation/records of communication on the above mentioned policies and procedures, and of the registered grievance records (if available).	6 months
Number of facilities provided for pregnant and breastfeeding women, childcare facilities provided.	Latest
Disciplinary procedures.	Latest
<b>6.6 Forced/ Trafficked Labour</b>	
Labour or other employment-related policies and procedures, which include a prohibition on the following: <ul style="list-style-type: none"> <li>○ Retention of identity documents or passports</li> <li>○ Payment of recruitment fees</li> <li>○ Contract substitution</li> <li>○ Involuntary overtime</li> <li>○ Lack of freedom of workers to resign</li> <li>○ Penalty for termination of employment</li> <li>○ Debt bondage</li> <li>○ Withholding wages</li> </ul>	Latest

6.6 Forced/ Trafficked Labour	
Health and Safety Policies and Procedures, to provide: <ul style="list-style-type: none"> <li>○ Free PPE</li> <li>○ Sanitation facilities</li> <li>○ Medical care</li> <li>○ Accident insurance</li> </ul>	Latest
Accident and emergency procedures	Latest
Records of meetings between the H&S responsible person(s) and workers	6 months
Records of work-related accidents	6 months
Records of occupational injuries using Lost Time Accident (LTA) metrics	6 months
Records of First Aid training for assigned operatives	6 months
Hazard Identification, Risk Assessment and Risk Control Procedures and Records (if applicable)	Latest

2.4.5 The outcome of the desk review should be recorded and maintained.

## 2.5 SAMPLING METHODOLOGY

- 2.5.1 The audit sampling should be representative of a cross section of the workforce<sup>8</sup> based on demographic characteristics relevant to the Management Unit - refer to the list of documents and information requested for Offsite Desk Review.
- 2.5.2 The audit team should keep control of the selection of sample. The selection of sample should be done as late as possible, i.e.. just before the interview is due to take place, in order to minimise the risk of workers being coached;
- 2.5.3 The sample calculation is based on the square root of the total number of workers at each audit site of the Management Unit (i.e.. mills, estates, Scheme Smallholders) based on the following formula:  $x = \sqrt{N}$  (where N= number of total workers).
- 2.5.4 In the event the auditor identifies vulnerable workers during the audit, the auditor should calculate a separate sample set by taking the square root of each identified vulnerable group in addition to the sample indicated in Table 2 of the Case Study.
- 2.5.5 If vulnerable groups within the workforce are identified during the audit execution (e.g. during site/field tour), auditors should request data from the Management Unit on the total number of the identified vulnerable groups within the workforce. In the event the Management Unit does not have such data, the auditor should interview the identified vulnerable worker.
- 2.5.6 Workers chosen for interviews should represent different types of workers.

<sup>8</sup> The total number of workers employed by the management unit either directly or indirectly. This includes contract workers and consultants (Annex 1: Definition, P&C 2018).

- 2.5.7 Once the sample has been determined, the intent should be for the auditor to interview 50% of sample workers individually and 50% in groups. The percentage may be adjusted based on specific circumstances with written justification in the formal audit notes.
- 2.5.8 The auditor shall consider using a translator(s) or interpreter(s) when most spoken languages at the audit site are different from the language(s) spoken or understood by the auditors. The translator(s) or interpreter(s) shall be independent of the Management Unit being assessed.
- 2.5.9 When determining the sample of workers within the workforce to be interviewed, the auditor shall consider a combination of the following (randomly selected):
- a. Job scope (field, non-field)
  - b. Gender (male, female). Include nursing mothers and those that are pregnant
  - c. Categories - permanent, full time, casual/ seasonal and day labour, and contract workers<sup>9</sup> (including outsourced<sup>10</sup> and subcontractor<sup>11</sup> workers). Note: All sample workers should be in one category, no worker should be in two categories.
  - d. Local, transmigrant and migrant workers
  - e. The spectrum of ethnic, national, linguistic, or religious groups;
    - i. youngest and oldest workers;
    - ii. different departments including security and workers in the mill and the field;
    - iii. different designations;
    - iv. worker representatives;
    - v. health and safety committee representative(s);
    - vi. new employees/trainees;
    - vii. workers in all pay grades;
    - viii. pregnant women;
    - ix. breastfeeding mothers;
    - x. workers from different shifts;
    - xi. workers not wearing uniforms.

2.5.10. Figure 1 is an example of a format<sup>12</sup> to gather the workers' information:

<sup>9</sup> P&C 2018, Annex 1: Definition - "Contract worker" refers to persons engaged in temporary work, or work for a specific period of time. It also refers to workers who are not employed directly by the company, but employed by a contractor or consultant with whom the company has a direct contract.

<sup>10</sup> "Outsourced worker" refers to workers who are not employed directly by the Management Unit, but employed by a third party company (e.g. Outsourcing service providers) with whom the third party company has a direct contract with the Management Unit.

<sup>11</sup> Subcontractor refers to a company that signs a contract with the Management Unit to perform a specific task/job within the Management Unit working areas.

<sup>12</sup> Sample based on an audit report from the Labour Auditing Guidance (draft) field test conducted in 2021.

1	What is the total number of workers in the mill?													
2	What is the total number of workers in the following categories?	Local						Non-Local						Total
		Permanent		Contract/Casual		Sub-contracted		Permanent		Contract/Casual		Sub-contracted		Total
		Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Total
3	What is the total number of workers in each work station?	Local						Non-Local						Total
		Operational Workers	Security/Auxiliary Police	Weighbridge Operator	Lab Operator	Workshop	General	Operational Workers	Security/Auxiliary Police	Weighbridge Operator	Lab Operator	Workshop	General	Total

Figure 1: Example format to gather workers' information

## Case Study

Management Unit Z has a total of 144 workers. During the interview sessions and onsite visit, the auditors identified four vulnerable groups among the workers, namely, pregnant women, workers with disabilities, transmigrant/ migrant workers recruited by agencies, and Indigenous People employed by the Management Unit. Based on 2.6.5, the auditors requested the details of the vulnerable groups from the Management Unit.

Table 1 and Table 2 illustrate the calculation to determine the samples based on the following formula:  $x = \sqrt{N}$ , (where N= number of total workers).

Total No. of Workers	Calculation ( $\sqrt{N}$ )	Total workers interviewed	Individual interviews (50% of x)	Group interviews (50% of x)	Effective time spent on interviews
144	$\sqrt{144}$	12	6	1 group of 6	4 hours

→ Table 1: To determine number of samples for total number of workers

Vulnerable Group	No. of Worker (N)	Calculation ( $\sqrt{N}$ )	No. of Sample (x) (rounded to the nearest whole number)
Pregnant Workers	9	$\sqrt{9}$	3
Workers with Disabilities	3	$\sqrt{3}$	2
Transmigrant/ Migrant Workers recruited by agencies	50	$\sqrt{50}$	7
Employed Indigenous People	7	$\sqrt{7}$	3

→ Table 2 : To determine number of samples for vulnerable workers identified

## 2.6. STAKEHOLDER CONSULTATION

- 2.6.1. Stakeholder consultation should be done during initial surveillance, recertification and special audits with due consideration to changes that may influence working conditions.
- 2.6.2. Stakeholder consultation should be conducted with the stakeholders in the list provided by the Management Unit (during the Application and Signing of Contract and Offsite Desk Review stage).
- 2.6.3. CBs should also consider other stakeholders, including those who are not in the list provided (2.6.2) that bear relevance to the audit site and the Management Unit based on outcomes of the Initial Research stage. CBs should have their own selection criteria to choose stakeholders to be consulted based on the CBs own risk evaluation, and also making reference to the RSPO complaint trackers or allegations in the public domain for any specific issues arising.
- 2.6.4. The CB should maintain an up-to-date list of all stakeholders that are relevant to be contacted for their input. The CB shall record the following information on each stakeholder, be it an individual or an organisation:
  - a. Name
  - b. Contact Person
  - c. Physical address
  - d. Contact information (telephone number/email address)
  - e. Date(s) of consultation
  - f. Method used to contact the stakeholder (e.g. email, registered post or via telephone)
  - g. Reason that the stakeholder is being contacted
- 2.6.5. The CB should acknowledge receipt of all written and verbal submissions of stakeholder comments if any. All of those submissions and how they have been addressed should be considered when planning audits and be clearly explained in the audit reports.

## 2.7. AUDIT AGENDA PREPARATION

- 2.7.1. In addition to the Audit Planning requirements in the RSPO P&C Certification Systems document, the CB should not conduct the on-site audit until the Offsite Desk Review has been completed. This includes the review of all necessary documents to develop an audit plan and appoint the relevant audit team members with labour expertise.

## 3. AUDIT EXECUTION

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### 3.1. OPENING MEETING

3.1.1. Generic requirements to conduct the Opening Meeting are explained in the ISO/IEC 17021 series and RSPO P&C Certification Systems document. In addition, the audit team should consider ensuring the following when conducting the opening meeting at the Management Unit:

#### A. General

- i. The opening meeting should be conducted in the language that is understandable by the majority of the attendees of the meeting. Use of a translator/interpreter service should be considered in the event that the language used by the audit team is different from the language understood by the attendees.
- ii. As a minimum, the following people should be considered to be invited to the opening meeting:
  - i. Senior management of the Management Unit or their appointed representative(s);
  - ii. Personnel who are responsible for key functions and processes at the Management Unit, which may include, for example: payroll, recruitment, accounts, human resources, health and safety, environment, workers' welfare, production and administration etc.; and
  - iii. Trade union or worker representatives.
- iii. Auditors should inform the Management Unit about the importance of attendance at the closing meeting and invite all key personnel to attend.
- iv. Auditors should emphasise the need for openness, honesty and transparency by the Management Unit as it is an opportunity to demonstrate their compliance status as well as part of the continuous improvement in fulfilling the RSPO P&C requirements on labour.
- v. Auditors should check and verify with the attendees if there are any changes on the documentation, information, scope and/or personnel from what has been communicated during the Application and/or Desk Review.

#### B. Compliance with Standards, Laws, and Regulations

- i. Criteria for the audit is based on the latest RSPO P&C, applicable national and regional laws, Collective Bargaining Agreements (CBA), company regulations and bilateral trade agreements, whichever affords the highest protection to workers.

### C. Communication

- i. The auditor should explain to the attendees at the opening meeting that the interviewed workforce will be provided with the contact information of the CB and the AB to facilitate confidence in communication and that this contact information should not be taken back from workers by the management after the audit.
- ii. Explain the process for communicating issues as they arise during the audit.

### D. Logistics

- i. Logistical arrangements to visit sites and that transportation needs are being met.

**Note:** To ensure independence, the audit team at their level best should avoid using vehicles owned by the Management Unit.

### E. Worker Information and Interviews

- i. Auditors should request a list of workers who are scheduled to work on specific days of the on-site audit, together with any details that may be required to ensure a representative sample can be chosen for interviews.
- ii. Auditors should confirm with the management if there is any subcontractor engaged by the Management Unit at the audited site. If yes, the number of their workers and the work being performed on the day of the audit should be recorded. Such subcontractor workers should be included in the sample.
- iii. Auditors shall provide an explanation to the Management Unit that the audit team will conduct the interview in both individual and/or group interviews.
- iv. The audit team at their level best shall ensure at all times that the interview sessions with the workforce are conducted in a private place, free from monitoring/surveillance as determined by the auditor(s). These interviews shall not be attended by management, supervisory or clerical staff and/or conducted in a place which would limit the communication from the interviewees (e.g. manager's room, office meeting room, public area, etc.)



- v. The audit team should emphasise and remind the management that:
  - i. Those in the workforce selected for interviews should not be discriminated against or put in an unfavourable position for taking part in interviews. There should be a safeguard against any form of intimidation or threat, particularly losing his/her job; or the minimum wage not being met for time spent speaking to auditor/s with the assurance that time spent speaking to them is paid time.
  - ii. Workers wages or benefits regardless of category of workers (permanent, full-time, casual/seasonal and day labour), should not be deducted for time spent speaking to auditors.

**F. On-site evidence collection by auditors**

- i. The auditor should explain at the opening meeting that audit evidence will be gathered by way of documents and records review, interview and site visits, therefore some photos will be captured throughout the audit process and that these will relate solely to the requirements of the RSPO P&C related to labour.

## 3.2. GUIDANCE FOR VERIFICATION OF PRINCIPLE 6 - RESPECT WORKERS' RIGHTS AND CONDITIONS

- 3.2.1. A triangulation methodology is recommended to obtain more accurate and conclusive results. This includes interviews with relevant personnel (management, workers and/or relevant stakeholders), review of documentation/records, and site/field observations. Evidence collected during the audit will be either conformance or non-conformance to the requirements relevant to Principle 6 of the P&C, particularly regarding labour aspects.
- 3.2.2. General Guidance for all criteria within Principle 6:
- a. 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*), it is recommended that auditors do a cross check on the documents requested during the documentation review with the sample of individual workers that they are interviewing.
  - b. For Criteria 6.4 (*prohibition against child labour*), a general note that the presence of children on plantations is not an absolute indication of child labour within the Management Unit. Probing questions are advisable to distinguish between actual child labour, young workers conducting hazardous work, school dropouts/absenteeism, and children who accompany their parents to the plantations (due to lack of childcare facilities, for non-working purposes).
  - c. A general recommendation is to observe the reaction and gesture of workers when they are interviewed to identify any signs of fear, reluctance or hesitation towards answering particular questions.
  - d. Auditors may choose to randomly interview individual meeting attendees to ascertain if the meetings were held and to cross-check information contained within the meeting records, including recollection of the issues raised.
  - e. Documents requested at the Offsite Desk Review stage may be requested again during audit execution upon the discretion of the auditor.

Criteria	Document Review <sup>13</sup>	Observations during site visit	Interviews – Example Questions <i>These are selected examples of questions that auditors may ask during the interview, however, it is at the discretion of the CBs and the auditor to develop more comprehensive questionnaires related to labour aspects as required in Principle 6.</i>
<b>6.1 Discrimination</b>	<ul style="list-style-type: none"> <li>● Recruitment policies and procedures</li> <li>● Job advertisement</li> <li>● Job description</li> <li>● Records on promotion</li> <li>● Compare:               <ul style="list-style-type: none"> <li>○ Contract between Management Unit and recruitment agency</li> <li>○ Contract between workers and recruitment agency</li> </ul> </li> <li>● Discrimination-related grievance mechanism records</li> <li>● Cross check employment contracts of men</li> </ul>	<ul style="list-style-type: none"> <li>● Observe employee notice boards and bulletins for any gender-specific communications or signs of discriminatory postings               <ul style="list-style-type: none"> <li>○ Signs of discriminatory practices</li> <li>○ Discriminatory job postings</li> </ul> </li> <li>● Discriminatory acts among supervisors and workers</li> <li>● Assess whether (may include interviewing, asking probing questions, document checking)               <ul style="list-style-type: none"> <li>○ There are disproportionate opportunities for men or women in roles that have higher pay or position</li> <li>○ Potentially vulnerable workers within the workforce <i>i.e.</i> <i>temporary, seasonal, migrants, subcontracted workers, piece-rate workers</i> are subjected to discrimination e.g. pay, treatment at work, disciplinary</li> </ul> </li> </ul>	<p><u>Management</u></p> <ul style="list-style-type: none"> <li>● What policies and procedures are related to recruitment of employees? How do you implement the policy? Could you show us a sample of some frequently used job advertisements?</li> <li>● Does the company provide other jobs for pregnant women on site? Can you give some examples on how this has been implemented?</li> <li>● Is there any procedure introduced by the management to check the workers’ pregnancy status? What action is taken if the workers are found pregnant?</li> <li>● Is it legally mandated to conduct pregnancy testing?</li> </ul> <p><u>Workforce</u></p> <ul style="list-style-type: none"> <li>● For migrant workers: What payments have you made before arriving at this company to work?</li> <li>● Are you aware of a Gender Committee or any of the activities/ training organised by this committee?</li> <li>● Is the company conducting pregnancy testing?</li> <li>● Have you faced any disciplinary issues?</li> </ul>

<sup>13</sup> To be requested and reviewed on a sample basis

Criteria	Document Review <sup>13</sup>	Observations during site visit	Interviews – Example Questions <i>These are selected examples of questions that auditors may ask during the interview, however, it is at the discretion of the CBs and the auditor to develop more comprehensive questionnaires related to labour aspects as required in Principle 6.</i>
	<ul style="list-style-type: none"> <li>and women for work of the same scope</li> <li>● Compare:               <ul style="list-style-type: none"> <li>○ Pay slips of local and migrant workers</li> </ul> </li> </ul>	<p>measures, promotions, incentives</p> <ul style="list-style-type: none"> <li>● Percentage of female vs. male dismissals/resignations</li> </ul>	<ul style="list-style-type: none"> <li>● Do you feel you are treated differently because of your:               <ul style="list-style-type: none"> <li>○ Gender</li> <li>○ Gender identity/ sexual orientation</li> <li>○ Nationality</li> <li>○ Ethnic Identity</li> <li>○ Religion</li> <li>○ Age</li> <li>○ Pregnancy status</li> <li>○ Membership in union, etc.</li> </ul> </li> </ul>
6.2 Pay and conditions	<ul style="list-style-type: none"> <li>● Employment contracts and related documents (information: working hours, deductions, overtime, sick leaves, holiday entitlement, maternity leave, criteria for dismissal, period of notice etc.) in national languages</li> <li>● Collective agreements in national languages</li> </ul>	<ul style="list-style-type: none"> <li>● Transparency and awareness on the quotas or production targets</li> <li>● Inspection of workers' living conditions and amenities in terms of accessibility (e.g. distance, ease of access), availability (e.g. sufficient stock) and quality (e.g. clean and adequate for a decent standard of living).               <ul style="list-style-type: none"> <li>○ Housing</li> <li>○ Clean water and electricity supply</li> <li>○ Access to sufficient and affordable food and daily necessities</li> <li>○ Sanitation facilities</li> </ul> </li> </ul>	<p><u>Management</u></p> <ul style="list-style-type: none"> <li>● What types of worker categories are there in the company? (e.g. permanent, full time, casual/seasonal and day labour, and contract workers)</li> <li>● For workers' accommodation, what type of accommodation do you provide?</li> <li>● How many rooms are there per house? How many workers are allocated to each house?</li> <li>● How does the Management Unit ensure compliance to legal requirements related to housing/accommodation?</li> <li>● What utilities and facilities are provided in the workers' accommodation?</li> <li>● For acquisition of non-certified units: In a situation where the Management Unit is still in the process</li> </ul>

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	<ul style="list-style-type: none"> <li>● Payroll documentation [e.g. payslips (including for temporary/ casual workers), bonuses, incentives]</li> <li>● Compare:               <ul style="list-style-type: none"> <li>○ Employment contracts and payslips</li> <li>○ HR/ legal records of compliance to national requirements for workers</li> </ul> </li> <li>● Plans - detailing upgrade of infrastructure (for acquisition of non-certified units)</li> </ul>	<ul style="list-style-type: none"> <li>○ Educational establishment</li> <li>○ Medical establishment</li> <li>○ Child care facilities</li> <li>○ Transportation</li> <li>● Signs of hidden working hour records (e.g. separate logbooks)</li> <li>● Excessive working hours for specific groups</li> <li>● Visible fatigue of workers</li> <li>● Unclear, unverifiable or ambiguous deductions on workers' payslips.</li> </ul>	<p>of upgrading the housing / accommodation, what is the timeline to do so?</p> <ul style="list-style-type: none"> <li>● Do your current salaries paid to workers meet national/provincial requirements?</li> <li>● What allowances and bonuses (production/ incentive) if any, are provided to workers who achieve their targets during regular working hours?</li> <li>● What are the other in-kind benefits (e.g. housing, food, transportation, utilities, child care, medical services, facilities, private medical insurance) you are providing for workers?</li> <li>● Has a prevailing wage assessment been made to quantify the cost of the above?</li> <li>● How many permanent and casual workers do you employ for core work (e.g. harvesting)?</li> </ul> <p><u>Workforce</u></p> <ul style="list-style-type: none"> <li>● Were the terms of the employment contract explained to you? Do you understand the terms and conditions of your contract? If no, what parts are not understood?</li> <li>● Do you have access to applicable local labour laws and was it explained to you in a language that you understand?</li> </ul>

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			<ul style="list-style-type: none"> <li>● Do the salary, benefits, housing, amenities and leave entitlements you receive meet the terms of your employment contract?</li> <li>● Do you understand how your wages are calculated?</li> <li>● Do you understand your payslip and the breakdown of payments and/or deductions?</li> <li>● Are wages daily-rated, piece-rated or monthly-rated? Have you ever been paid late? If yes, how often?</li> <li>● How often do you work overtime, on Sundays or public holidays? Are you paid extra for working overtime?</li> <li>● How many days of paid annual leave and medical leave are you entitled to?</li> <li>● For female workers: How much maternity leave are you entitled to? For males, paternity leave(if legally required)?</li> <li>● Are there any issues with your accommodation in this company?</li> <li>● How many hours are provided for water and electricity? Is it supplied for free or subsidised? Any problems with access to clean water and electricity supply?</li> </ul>

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			<ul style="list-style-type: none"> <li>● Are there nearby shops to buy necessities and are they regularly stocked? If yes, are prices reasonable?</li> <li>● Does management provide transport to the work site? Is it free or subsidised?</li> <li>● Any other facilities provided? Are you satisfied overall with the housing, facilities provided and living environment?</li> </ul>
<p><b>6.3 Freedom of Association and Collective Bargaining</b></p>	<p>Please refer to the Desk Review section for related documents.</p>	<ul style="list-style-type: none"> <li>● General impression and understanding related to union/worker committees</li> <li>● Organisational chart for union/worker committees</li> <li>● Notice boards displaying information on unions, contact information and activities</li> </ul>	<p><u>Management:</u></p> <ul style="list-style-type: none"> <li>● How have you communicated to workers about freedom of association and collective bargaining?</li> <li>● Are there any local trade unions and worker representatives/ worker organisations? If yes, how many workers are members of these?</li> <li>● What is your commitment to recognise and encourage workers to join worker unions?</li> <li>● When was the last workers union election?</li> <li>● How frequent are the meetings between the management and the union?</li> <li>● What was the most recent issue raised by the union and what action was taken by the Management Unit to resolve the issue?</li> </ul> <p><u>Workforce:</u></p> <ul style="list-style-type: none"> <li>● Are you aware of any workers unions or committees and their functions? Are there any restrictions to join these unions/committees?</li> </ul>

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			<ul style="list-style-type: none"> <li>● Have you received unfair treatment by the Management Unit because of your participation in unions/committees?</li> <li>● Are you able to access copies of union agreements, if any? Is it explained to you in a language that you understand ?</li> <li>● Has anyone in management been involved in the formation or operation of unions?</li> <li>● What is the process of electing the worker representatives? Are the representatives freely and democratically elected?</li> </ul>
<b>6.4 Child Labour</b>	<ul style="list-style-type: none"> <li>● Number of children living within the Management Unit</li> <li>● School/child care attendance records</li> <li>● Age screening verification and records (e.g. birth certificates, passports, national identity documents)</li> <li>● Records of working hours and type of work for young workers</li> </ul>	<ul style="list-style-type: none"> <li>● Underaged/young looking workers</li> <li>● Children who are not in school during school hours within the Management Unit</li> <li>● Children in school uniforms loitering within the Management Unit</li> <li>● “No child labour” policy displayed as announcements/notices</li> <li>● Assess whether (may include interviewing, asking probing questions, document checking) workers who have been identified as having higher targets obtain assistance from children</li> </ul>	<p><u>Management:</u></p> <ul style="list-style-type: none"> <li>● How effective has the implementation of the “no child labour” policy been?</li> <li>● Is there any history of child labour in the Management Unit? <ul style="list-style-type: none"> <li>○ If so, how was this addressed and what were the challenges faced?</li> </ul> </li> <li>● How do you verify the age of workers during recruitment?</li> <li>● How do you ensure that contractors and suppliers verify the age of workers?</li> </ul> <p><u>Workforce:</u></p> <ul style="list-style-type: none"> <li>● Are the targets/quotas set by the company achievable during regular working hours?</li> </ul>



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		<ul style="list-style-type: none"> <li>● Observe where the children usually go while their parents are at work (eg. close to housing area, within plantations)</li> </ul>	<ul style="list-style-type: none"> <li>● Do you get any family members or friends to help you achieve your quotas? <ul style="list-style-type: none"> <li>○ If yes, how long and frequently have they been helping you with your work?</li> <li>○ What type of work do they normally do?</li> </ul> </li> <li>● What do your children do when you go to work? Are there schools close by/accessible for your children to attend?</li> <li>● If the school is far, is transport provided for your child to attend school?</li> <li>● For young persons/ workers: How long have you been working at this company? What sort of work do you do? How long have you been doing this type of work? What does your daily work schedule look like?</li> <li>● To the best of your knowledge, do you know of any young workers working in the estate?</li> </ul> <p><u>Stakeholders</u></p> <ul style="list-style-type: none"> <li>● Have you seen children in the Management Unit during school hours?</li> <li>● Have you seen children helping their parents at the plantation? <ul style="list-style-type: none"> <li>○ If yes, when and how frequently does this happen?</li> <li>○ If yes, have you seen children carrying equipment around the Management Unit?</li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>● Did you receive any reports regarding the use of child labour in this Management Unit?</li> </ul>
<b>6.5 Harassment and Protection of Reproductive Rights</b>	<ul style="list-style-type: none"> <li>● Grievance records (specifically related to harassment or reproductive rights)</li> <li>● Pay attention to: <ul style="list-style-type: none"> <li>○ Matters raised at Gender Committee meetings minutes (e.g. keywords used during meetings such as “touch”, “grobe”, “sexual harrasment”, “rape”, “violence”,etc.)</li> <li>○ Record of new mothers (mothers with children of 2 yrs old and below)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● Observe workers’ interaction with supervisors, management personnel.</li> <li>● Observe notice boards and bulletins for any notices on prevention of sexual and all other forms of harassment and violence.</li> <li>● Assess the accessibility and conditions for workers to use the grievance mechanism, including the placement of complaints box.</li> <li>● Facilities for pregnant and/or breastfeeding women (e.g. dedicated room, milk storage).</li> <li>● Availability of separate restrooms for men and women.</li> </ul>	<p><u>Management:</u></p> <ul style="list-style-type: none"> <li>● How do workers channel their grievances?</li> <li>● Are there any historical cases of sexual and all other forms of harassment and violence being reported? If yes, what actions have been taken?</li> <li>● Has the management assessed the needs of new mothers? How was this done?</li> </ul> <p><u>Workforce :</u></p> <ul style="list-style-type: none"> <li>● When someone has a complaint or needs to report an issue, who can they go to that will listen and hear them out?</li> <li>● If the complaint is sensitive or private, is there a safe space or system for you to lodge your complaint?</li> <li>● Is there any case of sexual and all other forms of harassment and violence being reported? If yes, what actions have been taken?</li> <li>● How would you describe your relationship with your supervisor, management personnel and other workers?</li> <li>● What happens if you do something wrong at work?</li> <li>● Are you comfortable discussing problems with your supervisor?</li> </ul>

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			<ul style="list-style-type: none"> <li>● Are female workers (e.g. sprayers) given alternate work when pregnant or breast-feeding?</li> <li>● Are nursing mothers allowed breaks to breastfeed?</li> </ul> <p><u>Female Workers</u></p> <ul style="list-style-type: none"> <li>● Are there sufficient female clinical staff?</li> <li>● Does the company provide an appropriate channel for you to speak freely about sexual harassment and reproductive rights?</li> <li>● Have you experienced any sexual harassment /abuse? If yes, was it raised to management? How was it resolved?</li> <li>● Have there been any historical incidents where a worker was forced/ intimidated to abort their pregnancy?</li> <li>● Are there any schools or childcare facilities available? Are these facilities suitable for your needs?</li> <li>● For new mothers: What kind of facilities has been provided to you as a new mother?</li> </ul>
<p><b>6.6 Forced/ Trafficked Labour</b></p>	<ul style="list-style-type: none"> <li>● Employment contracts for workers</li> <li>● Specifically for migrant workers - Compare the employment contract:</li> </ul>	<ul style="list-style-type: none"> <li>● Notices and bulletins on “no trafficking”</li> <li>● Signs of segregation between groups, isolated individuals, or a hidden workforce</li> </ul>	<p><u>Management</u></p> <ul style="list-style-type: none"> <li>● What is the detailed recruitment process used by the Management Unit (including migrant workers)?</li> </ul>

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	<ul style="list-style-type: none"> <li>○ At source country</li> <li>○ At destination country</li> </ul> <p>to check for contract substitution<sup>14</sup></p> <ul style="list-style-type: none"> <li>● Recruitment and termination processes</li> <li>● Payroll documents for deductions, deposits, loans, levies, and unpaid benefits</li> </ul>	<ul style="list-style-type: none"> <li>● Restricted areas (not production or hazard related)</li> <li>● Security guards’ behaviours when interacting with workers</li> <li>● In case the Management Unit provides a safe place for workers to keep their passport, it is accessible to the worker at all times without any restrictions</li> </ul>	<ul style="list-style-type: none"> <li>● Are recruitment agencies used to recruit migrant workers?</li> <li>● How does the Management Unit select the recruitment agencies?</li> <li>● How does the management evaluate the performance of the recruitment agencies, specifically on labour trafficking?</li> <li>● What costs have been covered by the Management Unit during the recruitment process?</li> <li>● What mechanisms have been introduced by the Management Unit to evaluate costs paid by the workers during the recruitment process?</li> <li>● If workers have incurred costs during the recruitment process, what do these costs cover and what actions have been taken to remediate?</li> <li>● When overtime is necessary, are workers free to refuse it?</li> <li>● What are the types of deductions from workers’ pay?</li> </ul> <p><u>Workforce</u></p> <ul style="list-style-type: none"> <li>● Can you quit if you want to stop working at this company? What would you have to do?</li> </ul>

<sup>14</sup> P&C 2018 - Annex 1: Definition - The practice of substituting or changing the terms of employment to which the worker originally agreed, either in writing or verbally, which results in worse conditions or less benefits. Changes to the employment agreement or contract are prohibited unless these changes are made to meet local law and provide equal or better terms.

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			<ul style="list-style-type: none"> <li>● Do you have to pay anything if you want to quit?</li> <li>● What are your usual working hours and schedule? Do you usually work overtime?</li> <li>● Have you felt forced to work overtime?</li> <li>● Is there any dispute on the overtime payment?</li> <li>● What happens if you don't want to work overtime?</li> <li>● How frequently do you receive your payment and proof of it? Do you understand the breakdown in your payslip? What are the deductions for?</li> <li>● Have you ever received an advance on your wages or a loan (official or unofficial) from the Management Unit or a recruitment agency? If yes, what were the terms of this loan including the interest rate and time to repay the loan? Have the terms of the loan ever been changed after your agreement? Do you know how much longer you need to pay this loan?</li> <li>● Is there any restriction imposed by the Management Unit?</li> </ul> <p><u>Workforce - Migrant Workers</u></p> <ul style="list-style-type: none"> <li>● How did you get your job? What was the process like? How much did you pay to work here? If yes, what were the payments for?</li> <li>● In your journey from your home country to here, what did you pay for?</li> <li>● Did you receive any orientation when you arrived? What was covered during the orientation?</li> </ul>

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			<ul style="list-style-type: none"> <li>● When and where did you sign the employment contract? Is this the same contract you signed in your country?</li> <li>● Do you keep your passports with you? If the company keeps it, do they return it to you if you ask for it?</li> <li>● For migrant worker representatives: Do you understand the labour policy and procedures in the Management Unit?</li> </ul>
<p><b>6.7 Health and Safety</b></p>	<ul style="list-style-type: none"> <li>● Safety and Health Policy</li> <li>● Safety operating procedure</li> <li>● Risk Assessment and Management Plan (e.g. Hazard Identification, Risk Assessment and Risk Control (HIRARC)</li> <li>● Records on annual medical surveillance</li> <li>● Accident and investigation reports</li> <li>● First aid qualifications/training for assigned operator (i.e.. fire</li> </ul>	<ul style="list-style-type: none"> <li>● Public display of Health and Safety notices and announcements (e.g. accident and emergency procedures in languages that workers understand)</li> <li>● Noticeable/visible risks to workers' health and exposure to hazardous substances or dangerous work positions, e.g.:             <ul style="list-style-type: none"> <li>○ Work environment (working space, temperature, height, housekeeping, cleanliness etc.);</li> <li>○ Fire fighting and emergency equipment;</li> <li>○ Machinery/ working equipment condition protection and maintenance;</li> </ul> </li> </ul>	<p><u>Management</u></p> <ul style="list-style-type: none"> <li>● What is the commitment for the management of workers safety and health? Any written commitments available? How do you communicate that? Were all measures established by the management applied by the workforce?</li> <li>● Is there a specific team formed to discuss issues related to workers' safety and health? How was it established? How frequent is the meeting? What are the key issues discussed?</li> <li>● How did you monitor accidents/near misses? Who is responsible for conducting risk assessment for any new activity? Do you have accident reports (with action taken for resolution)? Is it reported to the relevant authority?</li> <li>● What are the most common injuries or health issues at the Management Unit? How often do they occur?</li> </ul>

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	extinguisher, PPE, etc.) <ul style="list-style-type: none"> <li>● Safety training plan</li> <li>● Material Safety Data Sheets (MSDS) (if applicable)</li> <li>● Safety committee/Emergency Response Team’s org. Chart, minutes of meeting</li> </ul>	<ul style="list-style-type: none"> <li>○ Hazardous substance storage, handling and disposal; and</li> <li>○ Waste management.</li> <li>● Availability and accessibility to sanitation facilities and first aid equipment</li> <li>● Use of appropriate personal protective equipment (PPE).</li> <li>● Evaluate if sanitation facilities provide privacy, clean, and are adequate for the number of workers</li> </ul>	<ul style="list-style-type: none"> <li>● How do you ensure all workers fulfil the safety operating procedure when performing their task? Is there any penalty if the workers do not comply with the safety procedure?</li> </ul> <p><u>Workforce</u></p> <ul style="list-style-type: none"> <li>● What kind of training do you have to go through before starting any work? With your current working equipment and condition, does it compromise your safety? How did you obtain the PPE and other health and safety equipment (e.g. fire extinguisher, first aid equipment, etc.) from the management?</li> <li>● Can you explain the process for any emergency situation? Who and how will you contact the person in charge? Is there any vehicle ready to bring the injured/sick worker to obtain medical treatment?</li> <li>● Where is the nearby First Aid facility available? Have you been trained on how to use the First Aid kit? What is provided in the First Aid kit? Is a person trained in First Aid always available at your worksite?</li> <li>● Are there any regular checks on the First Aid box conducted? What was your experience in applying your First Aid training? Are the First Aid supplies and disposal easily accessible and sufficient?</li> </ul>

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			<ul style="list-style-type: none"> <li>● Is PPE and replacements provided for you? Did you have to pay for it? Did the PPE provided improve your safety and provide adequate protection for your job?</li> <li>● Where is the nearest clinic available and is it easily accessible including after regular working hours?</li> <li>● Are you covered by accident insurance?</li> <li>● Have you been trained to handle machinery, equipment or handling of chemicals?</li> <li>● Do you have a licence to operate the machines/vehicle you use (when applicable)? How do you find yourself competent to handle this equipment/vehicles?</li> <li>● Have you experienced any pain, injury or sickness when dealing with the chemicals and equipment?</li> </ul>

**Source:** Adapted and modified from TUV Rheinland Audit Questionnaire used in the Field test; [Verite Fair Hiring Toolkit](#) and [BSR Gender Equality in Social Auditing Guidance](#).



### 3.3. SITE/FIELD TOUR

- 3.3.1. In order to ensure a smooth interview process during the site visit, the auditor should explain and limit it to only a maximum of two people from the management representative to accompany the auditors during the site/field tour (unless it would involve high security risk to the audit team).
- 3.3.2. The auditors shall always ensure strict compliance with the safety rules set by the local authority and/or the Management Unit.
- 3.3.3. Auditors should be aware of site traffic conditions and avoid walking where workers are trying to move or transport hazardous products when conducting the site visit.
- 3.3.4. The auditor at their professional judgement should ensure all areas which are important for the operations and workforce are identified and covered during the site visit. Those areas might include, but not necessarily be limited to the following:
  - a. operation/production areas (e.g. harvesting, nursery, spraying, manuring, upkeep, FFB receiving area, production area, dispatch area, etc.)
  - b. store/warehouses (e.g. fertiliser store, chemical store, schedule waste store, lubricant store, general store, etc.)
  - c. Facilities and/or amenities provided for the workforce (e.g. workers' canteen, rest area, kitchen, grocery store, creche, place of worship, school, clinics, etc.)
- 3.3.5. The auditor at their professional judgement should be able to pay attention and evaluate the following aspects when conducting the site visit, but not necessarily be limited to the following:
  - a. Understanding the work being done at the audit site;
  - b. Evaluating health and safety practices;
  - c. Identifying potentially vulnerable workers and/or family member(s) living in the Management Unit site;
  - d. Observing management systems and practices, including atmosphere between management, supervisors and workers;
  - e. Note any physical observable evidence that relate to the requirements of the RSPO P&C.

### 3.4 INTERVIEWS WITH WORKERS

- 3.4.1. Based on the Initial Research, Desk Review, documentation review or other means, the auditor should determine the number of samples to represent a cross section of the workforce.
- 3.4.2. The audit team should develop an interview questions template for workers – refer to the **Guidance for Verification of Principle 6 - Respect Workers' Rights and Conditions**. If a generic template is used, questions should be adapted to the social and labour risks at the audit location and be based on the working environment at the audit site.
- 3.4.3. Auditors should introduce themselves and the purpose of the audit prior to conducting the interviews.
- 3.4.4. The purpose of personal workers' interviews is to 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;

- 3.4.5 Auditors should be flexible to adapting to the current situation (e.g. emotions, environment, weather, etc.) and use appropriate skills and techniques when interviewing workers at different audit sites such as the mill, plantations and common areas. For this to take effect, the auditor who carries out workers interviews should have skills to make workers feel at ease.

## GOOD PRACTICES FOR WORKER INTERVIEWS

**1) Setting the context:** When conducting face-to-face interviews, auditors should first set the context of the issues to be covered and then read out the relevant statements, exploring if the worker agrees or disagrees with each statement.

**2) Starting with the least sensitive topics first:** Auditors should structure interviews in a way that less sensitive topics are covered first (such as health and safety) followed by the more sensitive (Such as discrimination and sexual harassment). This is to give time to the interviewer to create a safe space and build rapport with the worker before touching on the more sensitive topics, which may be perceived as more threatening.

**3) Introducing sensitive issues:** It is not easy to begin a discussion about a negative experience during face-to-face interviews. When speaking to workers about violence or harassment, it's important to open the discussion by talking about less sensitive issues, such as women's health or well-being, their life experiences, or their relationships at home, at work, and in the communities, before broaching the more difficult questions.

**4) Dealing with worker distress:** During an interview, workers may be overwhelmed and feel distressed thinking about their experiences of violence. As necessary, take breaks during the interview and give workers time to collect themselves if needed. To support workers, reinforce their coping strategies and let them know that by sharing their experiences, they are helping others who may be going through similar experiences.

*Source: Adapted from BSR Gender Data Impact Framework*

- 3.4.6 Auditors should have already identified if they need interpreters/translators for the interviews with the workers. Translators/interpreters shall be present when interviewing workers who do not speak the main language used at the Management Unit.

- 3.4.7 All information communicated by the interviewees should be captured by the auditor, even if it is his/her personal opinions or perspectives. The auditor should avoid writing notes while conducting the interview to avoid distress. This information shall be properly kept by the CB at least one certification cycle for the purpose of validation and verification during the subsequent audits.

- 3.4.8 It is always best for all interviews to take place on-site. Off-site interviews should only take place when there is a perceived threat to workers by the management for providing information to auditors; or when the audit site does not have a space that would allow the workers to speak confidentially.

- 3.4.9 All interviews should take place in a quiet, private area without the presence of management representatives or those in supervisory and/or administrative roles as mentioned during the Opening Meeting.

- 3.4.10 During the site visit at the workplace, casual interviews can take place during meals and rest breaks.
- 3.4.11 All samples that have been interviewed should be provided with the contact information (e.g. communication channel) of the CBs and the ABs, as an alternative channel for them to reach and share any information after the audit. While sharing the contact information, the workers should be assured by the auditor of the confidentiality of the information shared.
- 3.4.12 Interviews may be conducted in the presence of a trade union member with the permission of the worker and if the CB auditor feels worker/s are comfortable with this arrangement;
- 3.4.13 The auditor should maintain a list of workers that have been interviewed (individually and/or in groups) at each audit. This list should be considered as audit evidence to ensure the same workers are not spoken to in the subsequent audits unless there are valid grounds for speaking to them;
- 3.4.14 Points raised by workers should be fed back to and shared as early as possible with members of the audit team carrying out management interviews or performing a document review to facilitate verification and corroboration;
- 3.4.15 Personnel (non-field staff) interviews should be held with administrative and clerical staff, recruitment staff, security guards, HSE Officer/Manager and those trained in health and safety and members of workers committees, grievance mechanism officers, that may exist.
- 3.4.16 For the selection of workers for interviews, refer to **Sampling Methodology**.

### 3.5. CLOSING MEETING

- 3.5.1. Generic requirements to conduct the Closing Meeting are explained in the ISO/IEC 17021 series and RSPO P&C Certification Systems document. In addition, the audit team should consider ensuring the following when conducting the closing meeting at the management unit:
  - a. The findings related to labour indicators should be presented at the Closing Meeting of the RSPO P&C audit.
  - b. It is good to ensure the attendees at the closing meeting are the same groups of people that attended the Opening Meeting.
  - c. The closing meeting should be conducted in the language that is understandable by the majority of the people present at the meeting. Usage of a translator/interpreter service should be considered in the event that the language used by the audit team is different from the language understood by the attendees.

## 4. AUDIT REPORTING

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- 4.1. In addition to audit reporting requirements that are specified in the RSPO P&C Certification Systems document, the CB should include the following information for each audit conducted at the Management Unit's site:
- a. A record of interviews conducted that includes:
    - i. Categories of workers (permanent, full-time, casual/seasonal and day labour, and contract workers) spoken to and their genders;
    - ii. number of individual and group interviews;
    - iii. number of workers in each group interview; and
    - iv. location of interviews (i.e., on-site or offsite).
  - b. 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;
  - c. 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;
  - d. Names of recognised Trade Unions are established at the audit site and the names of worker representatives as well as how the Representatives are elected and their function, where relevant;
  - e. The current CBA with the effective date and the period of validity (where applicable);
  - f. A table noting the number, types of subcontractors working at the audit site, nature of subcontracting activities and the number of workers employed by each subcontractor.

### 4.2. AUDIT RECORD-KEEPING

- 4.2.1 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.
- 4.2.2 Audit evidence should be available in the file of the Management Unit and should be kept for at least one certification cycle (5 years).



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.

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