Independent Review of the Implementation of RSPO Labour Auditing Guidance

Presentation to the RSPO Assurance Standing Committee - 10th November 2024

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Agenda

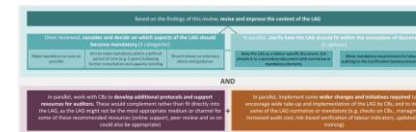|	
Introduction, objectives of the review & methodology	5 mins
Summary of key findings	10 mins
Overarching recommendations & discussion	20 mins
Concrete recommendations & discussion	25 mins

Objectives of the review

1   **Comprehensive review** of the RSPO Labour Auditing Guidance to grasp its objectives, requirements, and audit expectations.

2   Identify and address **gaps, inconsistencies, and areas of ambiguity** and provide **recommendations for improvement**.
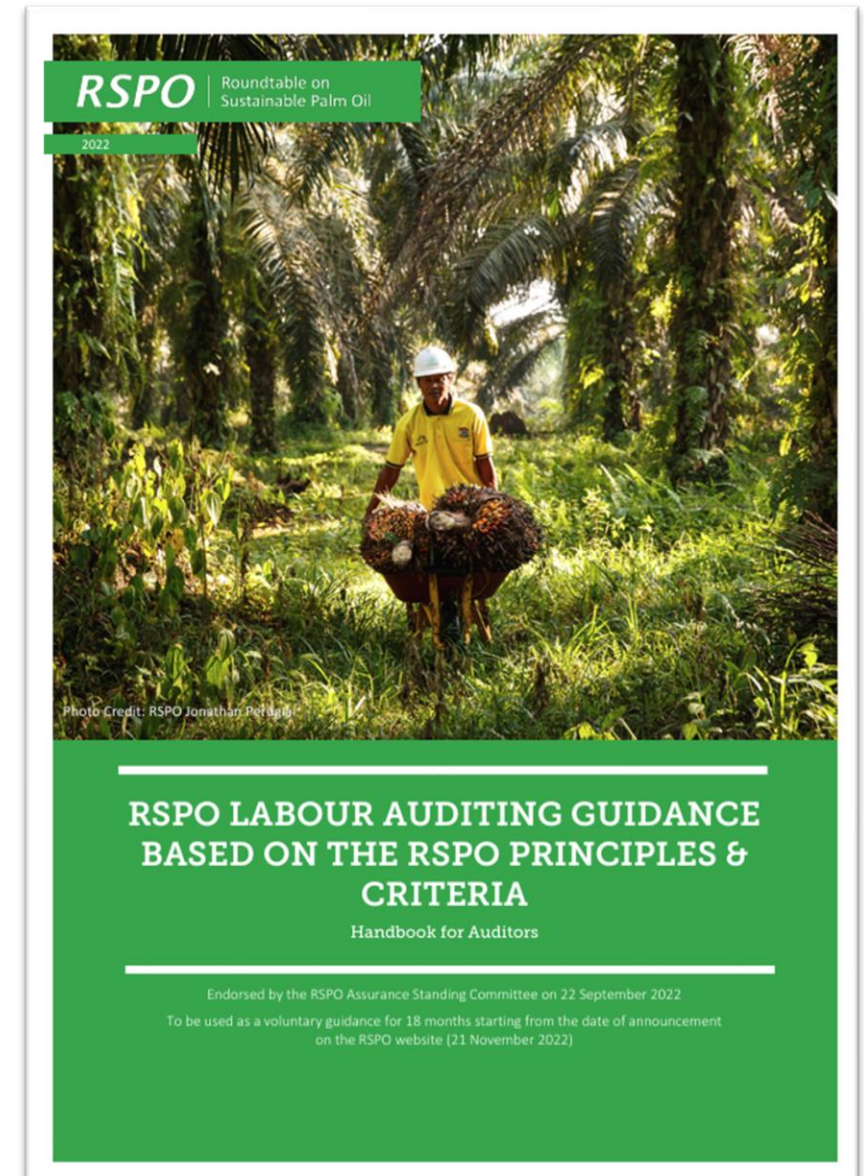
3   Evaluate the Guidance's **applicability to different organisations**, including SMEs.

4   **Review how CBs implement** the audit process as outlined in the Guidance, including the scope, methodology, and evaluation criteria.

5   Understand **why CBs may not be using the guidance**

RSPO | Roundtable on Sustainable Palm Oil

2022

Photo Credit: RSPO Jonathan Perugia

RSPO LABOUR AUDITING GUIDANCE BASED ON THE RSPO PRINCIPLES & CRITERIA

Handbook for Auditors

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 on the RSPO website (21 November 2022)

Objectives of the review

6 Analyse the **strengths and weaknesses of the auditing process** within the Guidance and provide recommendations for improvement.

7 Consider the **broader context and challenges** of the RSPO certification process and explore how the Guidance can better support certification audits.

8 Examine any **gaps between *Principle 6*** in P&C 2018/ future P&C 2024* & propose enhancements to the Guidance, particularly related to audit methodologies.
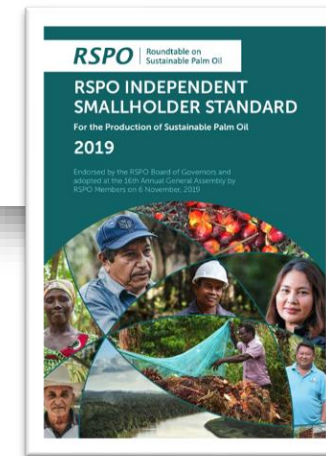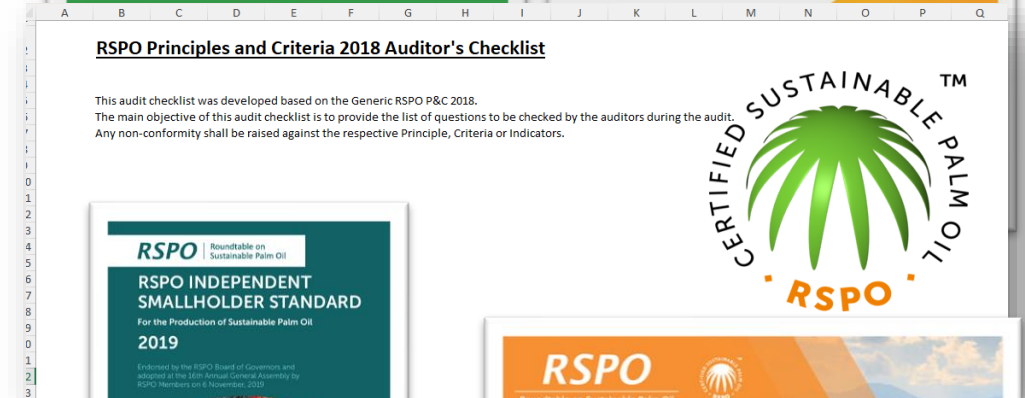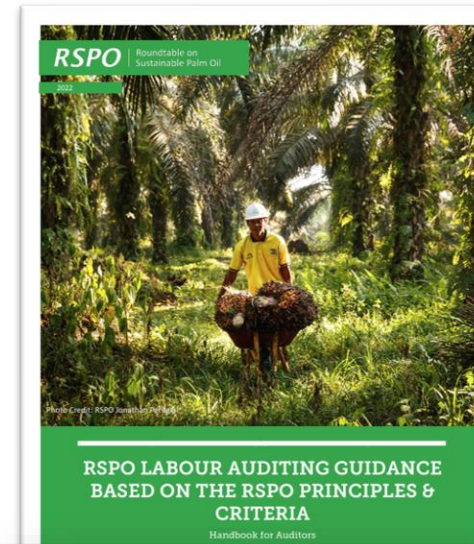
*stipulation in our contract: only if finalised by July 2024; note researchers provided input in P&C consultation and shared report draft

Methodology

A desk-based review:

- literature on labour auditing
- scan of comparable labour auditing guidance published by 10 other standards bodies.
- Development of a framework detailing good labour auditing practices:
  - ➢ used to systematically review the LAG.
- LAG was also evaluated against the 2018 P&C Principle 6*

Interviews:

- To gather opinions on the LAG
- Telephone interviews with representatives of 17 organisations covering auditors, CBs, palm oil producers, other standards bodies, labour unions and NGOs
- Users of the LAG (limited to date) and those with experience in labour auditing or implementation of similar LAGs in other systems

*Note that the revised standard (P&C 2024) has not yet been approved by the GA at the time of finalisation of this report

Methodology

	Organisations interviewed
1	4C (standards body)
2	Sustainability Initiative South Africa/ SIZA (standards body)
3	ASI (accreditation body)
4	Better Cotton (standards body)
5	BSI (certification body)
6	CNV (NGO)
7	Control Union (certification body)
8	Fedepalma (palm oil growers association)
9	Forest Peoples Programme (NGO)

10	Hukatan (labour union)
11	IGC (producers organisation)
12	Oxfam (NGO)
13	Independent palm oil auditor from Malaysia
14	Palmas Montecarmelo (palm oil producer)
15	Rainforest Alliance (standards body)
16	SCS Global (certification body)
17	SGS (certification body)

Key findings

Review of the LAG as a guidance document

- Generally, logically structured and clearly written.

- Needs improvements in visual layout and signposting.

- Formatting and language differ from the Certification Systems document.

Concerns Raised:

- Possible duplication and overlap with Certification Systems, RSPO audit checklist, and Principles and Criteria.

- Perceived as an additional or competing set of requirements, not a handbook.

- LAG sometimes exceeds 2018 P&C Principle 6 requirements.

Clarification Needed:

- Why is it useful to have example interview questions in a guidance document.

- How those example questions relate to both the P&C indicators and the aspects for checking in the audit checklist.

Review of the coverage of the LAG against good practices

General Audit Approach:

- More guidance needed on balancing document checks, site inspections, and interviews.

- Addressing non-visible labour issues (harassment, gender discrimination, forced labour).

- Gender-sensitive auditing methods and identifying high-risk labour issues

Interviews:

- Guidance on prioritizing worker characteristics for interviews.

- Encouragement to consult stakeholders and interview labour providers.

- Importance of gaining workers' trust and protecting them from reprisals.

- Sub-optimal practices: auditors traveling with company staff and discouraging off-site interviews

Review of the coverage of the LAG against good practices

Physical Inspection and Document Review:

- Useful guidance provided, but needs rules for sampling worker records to identify discrepancies

Reaching conclusions:

- Need for clearer guidance on non-compliance and acceptable evidence.

- Consistent interpretation of labour indicators and exceptions for data triangulation

Auditor Competence:

- Challenge in recruiting competent auditors for Principle 6 compliance.

- Need for improved experience requirements and professional training in labour issues

Positive Feedback on LAG:

- Provides clarification and preparation aid for audit teams.

- Useful for auditors who are not social specialists

Audit Process Impact:

- Longer audit process requiring more audit days and auditors.

- Increased costs and need for client explanations

Implementation Challenges:

- Few CBs or auditors have used the LAG since its 2022 endorsement.

- One CB took eight months to adapt their process to the LAG.

- Desk review phase now longer; additional documentation off-putting for some producers.

Mixed Opinions on Mandating LAG:

- Civil society supports making all LAG guidance mandatory.

- CBs and producers have mixed views; some suggest only certain elements should be enforced, as there is a risk of creating a new labour standard through LAG.

- Need for dedicated labour auditing training for auditors.

- Smaller producers may need additional resources or capacity-building support.

Recommendations
for an improved RSPO labour audit process

➢ **Given the findings, a mix of actions is needed and a recognition that there is no quick-fix/simple measure!**

➢ **Need for concrete steps linked to the LAG document**

➢ **But also need for broader measures to enable effectiveness of concrete steps linked to LAG document**
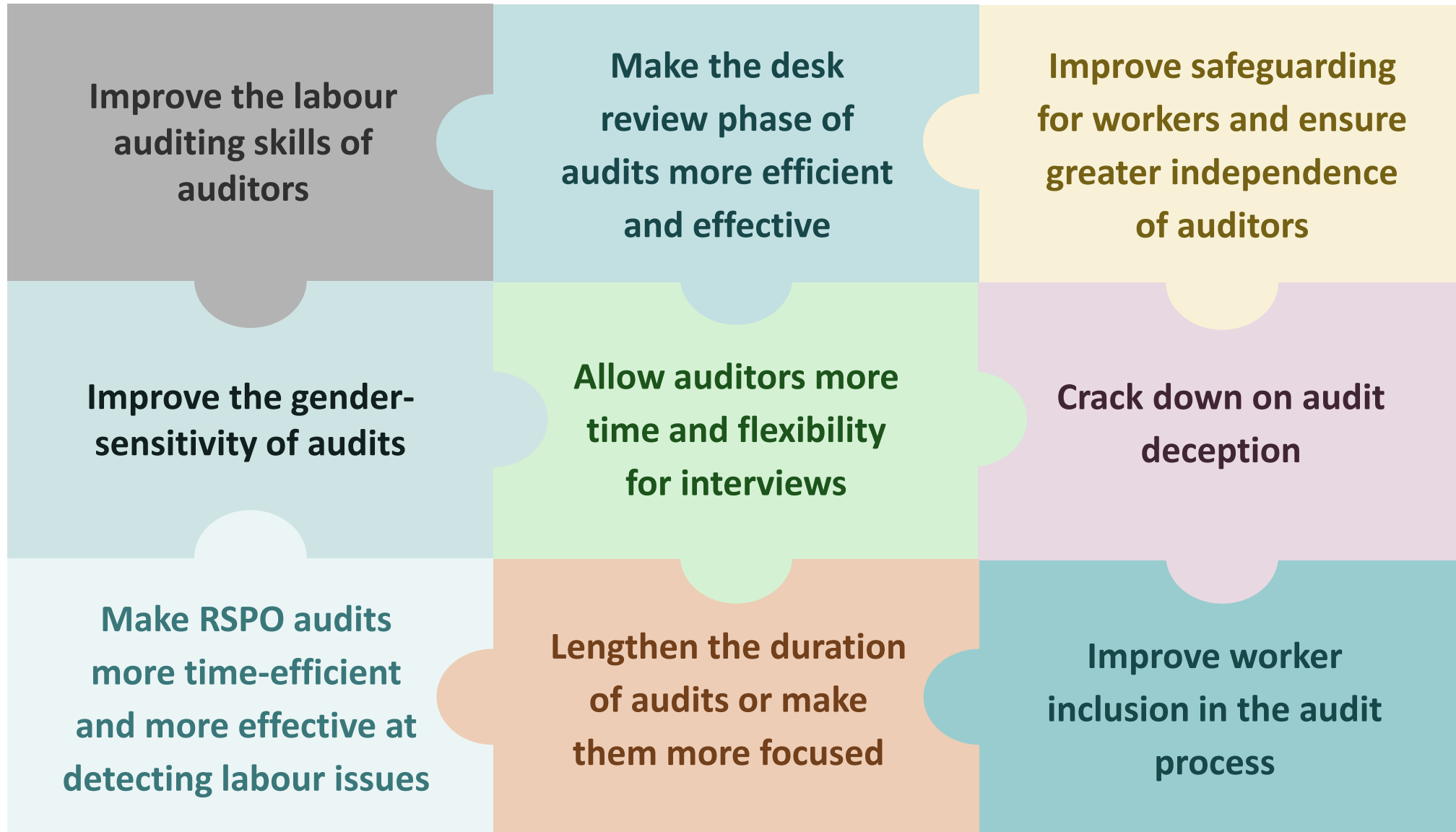
Broader measures
for an improved RSPO labour audit process

Improvements that may be needed to the RSPO auditing process

Improve the labour auditing skills of auditors

Make the desk review phase of audits more efficient and effective

Improve safeguarding for workers and ensure greater independence of auditors

Improve the gender-sensitivity of audits

Allow auditors more time and flexibility for interviews

Crack down on audit deception

Make RSPO audits more time-efficient and more effective at detecting labour issues

Lengthen the duration of audits or make them more focused

Improve worker inclusion in the audit process

Improve the labour auditing skills of auditors

Possible Actions linked to the LAG:
- Improve content and presentation of the Labour Auditing Guide (LAG).
- Consider making some guidance mandatory to ensure good auditing practices.
- Identify mandatory aspects of audit methodology for experienced auditors.
- Overcome resistance to following more guidelines.

Wider support for Auditors:
- Address needs of less experienced auditors, including environmental specialists.
- Specific in-depth labour auditing training.
- Making sure all freelance auditors have access to additional capacity building.
- Improve individual skills (e.g., facilitating focus groups, detecting less visible labour issues).
- Challenge cultural stereotypes and raise awareness of labour rights.

Professional Recognition and Work-Life Balance:
- Increase recognition of auditing as a profession.
- Promote better work-life balance for auditors, especially in the field.
- Example: Rainforest Alliance's rule on audit time limits and compensation for overtime.
- Collaboration with CBs to build auditor capacity and support the profession.

Improve the gender-sensitivity of audits

Gender-sensitivity helps identify gender-related labour non-compliances and rights abuses, improving overall audit effectiveness

Actions:

- Increase pressure and support for CBs to include women auditors in audit teams.

- Improve gender awareness among auditors through training and resources like the LAG.

- Include gender considerations during initial research and desk review phases (e.g., review gender-related legislation, consult women's NGOs).

- Recommend or require female auditors to conduct interviews with female workers when appropriate.

- Provide guidance for situations where no female auditors are available to interview female workers.

- Share techniques for assessing gender discrimination and gender-specific labour issues (e.g., disaggregating data by gender).

Make RSPO audits more time-efficient and more effective at detecting labour issues

➢ Auditors and the auditing system sometimes fail to detect and report labour rights abuses at palm oil estates and mills.
➢ Insufficient time allocated for audits to assess Principle 6 compliance.
➢ More rigorous labour auditing methodology through the LAG adds to time pressures.

Actions:
- Focus audits on high-risk and high-priority labour issues specific to the Management Unit.
- Provide guidance on effective stakeholder consultation with local understanding of employment trends and workplace conditions.
- Prioritize certain categories and groups of workers when selecting worker samples.
- Balance auditors' time between checking documents, site inspection, and interviews.
- Check for documentary evidence of policy implementation, not just existence.
- Respond if certain worker types are unavailable for interviews, especially seasonal and third-party workers.
- Follow the labour supply chain and interview labour providers in contexts with identified forced labour risks.
- Investigate non-visible labour issues like harassment, gender discrimination, or forced labour.
- Clarify acceptable evidence for corroborating worker testimonies and define major and minor non-compliance.

Make the desk review phase of audits more efficient and effective

Feedback from CBs:

- Improve efficiency and effectiveness of audits by streamlining the desk review phase.
- Desk review should perform a risk assessment function to better plan audits and identify priorities for the field part.

Actions for Desk Review:

- Start some desk investigation earlier, at the application stage.

- Provide more advice and guidance in the LAG, including online resources to consult.

- Reduce the number of documents required in the desk review to ease the burden on producers.

- Support small businesses in collating documentation requested by CBs.

Avoiding Duplication:

- Clarify how initial research and desk review relate to document checks in the field.

- Avoid duplication of effort to free up time for interviews with workers and stakeholders

Allow auditors more time and flexibility for interviews

Interview Time and Flexibility:
- Grant auditors more time and flexibility for worker interviews.
- Allow interviews to exceed the 20-minute minimum as needed.
- Allocate more time for focus groups or group interviews.

Sampling Guidance:
- Recommend sampling greater than the square root of the total number of workers.
- Provide guidance on the number of workers to include in group interviews.
- Advise on the pros and cons of different group sizes.

Sampling Approach:
- Consult specialist advice on recommended sampling approaches.
- Continue using random stratified sampling but provide clearer guidance on worker characteristics for stratification.
- Consider recommending purposive sampling to ensure vulnerable workers are included.

Document Review and Interviews:
- Review the approach to sampling worker records during audits.
- Include special advice on interviewing children in auditor training.

Lengthen the duration of audits or make them more focused

- RSPO audits are too short to fully assess Principle 6.
- More rigorous auditing methodology via the LAG will stretch auditors further

Options for Addressing Time Constraints:

Option A – Increase Audit Days

- Allocate more audit-days for RSPO surveillance or recertification audits.
- Increases cost and human resource requirements for Management Units.
- Needs debate within RSPO and discussion with stakeholders.
- Potentially discourages producers from seeking or renewing certification.

Option B – Narrow the Audit Focus

- Keep audits at current level (approx. three audit-days or nine man-days).
- Focus on major indicators and a percentage of minor indicators per surveillance audit.
- Ensure full coverage throughout the certification cycle.
- Requires careful consideration and potential changes to RSPO assurance system.
- Improve links to other information-gathering, monitoring, and due diligence sources to reduce audit burden.

There is a need to conduct worker interviews in more confidential circumstances in order to gain the necessary trust of workers and better protect workers from reprisals after the auditors leave

Need for Confidential Worker Interviews:
- Conduct interviews in more confidential circumstances to gain workers' trust and protect them from reprisals.

- Auditors should operate independently from estate and mill staff to avoid conflicts of interest and ensure audit rigour.

Actions:
- Clarify procedures for auditors receiving follow-up calls from workers.
- Conceal the identity of interviewed workers and those whose records are checked in audit documents.
- Encourage off-site interviews.
- Address issues of auditors travelling with company staff and develop protocols for site arrival.
- Relax group interview sampling requirements to allow larger groups, reducing the risk of worker identification and targeting.
- Strengthen advice on ensuring the independence of unions and worker committees.

Crack down on audit deception

- Widespread evidence of audit deception in garments and agriculture sectors.
- RSPO should emphasize the risk of Management Units covering up non-compliances and labour rights abuses

Alertness to Information Deception:
- Include reminders in the LAG to be alert to fraudulent documents and double book-keeping.

- Make the topic more prominent in the LAG.

Clear Procedures for Auditors:
- Develop procedures for auditors if access to workers, documents, or premises is blocked.

Review Measures and Penalties:
- Consider automatic non-compliance for coaching workers, refusing access, or falsifying information.

Anti-Bribery and Anti-Corruption Policy:
- Present CB's anti-bribery and anti-corruption policy at the opening meeting.
- Require Management Unit to sign a declaration to respect the policy (example from Rainforest Alliance).

Improve worker inclusion in the audit process

Worker-Centric Models of Compliance:
- Growing calls for worker-driven labour rights initiatives.
- Third-party auditing must align with worker-driven principles.

Key Components:
- Auditors with deep industry and labour issue knowledge, operating independently of financial control by buyers.
- In-depth worker interviews under conditions where workers can speak freely.
- Effective worker education to enable partnership with auditors.
- Independent complaint resolution mechanism with central role for workers' organizations.

Recommendations for RSPO Auditing System:
- Engage with unions and local stakeholders to inform workers of their rights and the audit process.
- Develop a protocol for auditors to respond to worker contact.
- Encourage presence of workers and representatives at opening and closing meetings.
- Involve workers in developing corrective action plans for non-compliance.
- Link audits to year-round monitoring and information-gathering on working conditions.

Concrete recommended actions
for the LAG

Concrete recommended actions

Based on the findings of this review, **revise and improve the content of the LAG**

Once reviewed, **consider and decide on which aspects of the LAG should become mandatory** (3 categories)

| Make mandatory as soon as possible | Aim to make mandatory within a defined period of time (e.g. 2 years) following further consultation and capacity-building | Should remain as voluntary advice and guidance. |

In parallel, **clarify how the LAG should fit within the ecosystem of documents** (2 options)

| Keep the LAG as a labour-specific document, but elevate it to a procedure document with normative or mandatory elements | Move mandatory requirements for labour auditing to the Certification Systems document |

AND

In parallel, work with CBs to **develop additional protocols and support resources for auditors.** These would complement rather than fit directly into the LAG, as the LAG might not be the most appropriate medium or channel for some of these recommended resources (online support, peer review and so on could also be appropriate)

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In parallel, implement some **wider changes and initiatives required** to encourage wide take-up and implementation of the LAG by CBs, and to make some of the LAG normative or mandatory (e.g. checks on CBs., managing increased audit cost, risk-based verification of labour indicators, updated CB training).

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Recommendations:

1. Add requirements or make existing requirements stricter

> ➤ to bring the LAG closer in line with best practices identified in the literature;

2. Provide more advice and guidance on labour auditing;

3. Improve the formatting and presentation of the LAG, to make it easier to use;

> ➤ E.g. move some of the tables and templates to an annex

4. Clarify some of the language;

5. Improve consistency between the processes laid out in the LAG and the processes already established in Certification Systems;

6. Refer to protocols, policies or procedures that we recommend should be developed by the RSPO and its CBs (covered later in this presentation).

C.f. Annex 2 of the report for more detailed recommendations on the content

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Category	Examples from the LAG
1. Strive to make mandatory as soon as possible	- Sampling methodology (for sampling workers, worker documents and worker accom. sites) - Team selection - Measures for safeguarding workers - Requirements on stakeholder consultation - Measures on bribery and corruption - Rules on audit reporting
2. Strive to make mandatory following consultation and capacity-building	- Recommendation to hold some interviews off-site - Stronger advice against travelling to work-places in company vehicles /with company staff - Requirements for CBs to provide female auditors and/or ensure that male auditors undergo training in gender-sensitive audit techniques - A new protocol for providing workers with auditors' contact details
3. Present as guidance	- Example interview questions in section 3.2 - Good practices for worker interviews - Proforest's suggestion for additional guidance in the LAG on gender-sensitive auditing and uncovering non-visible labour issues - Suggestions for awareness-raising materials for CBs and auditors to use

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Option A

Keep the LAG as a labour-specific document, but elevate it to a procedure document with normative or mandatory elements.

➢ Remove any elements which are better suited to the Certification Systems document, the audit checklist or the P&C.

➢ Within the LAG, use consistent language and formatting to distinguish mandatory requirements from voluntary recommendations and advice.

➢ Possibly move the advice to an annex. Add cross-references to relevant requirements in the Certification Systems document which relate to audit team selection and auditing methodology.

Option B

Move mandatory requirements (and recommendations) for labour auditing to the Certification Systems document.

➢ Make the LAG more of a guidance document or manual with advice.

➢ Use softer language and avoid presenting the text as numbered rules or requirements.

➢ This document will be linked to RSPO training materials on labour auditing.

➢ Potentially add more guidance specific to palm oil sites in various worldwide contexts.

Timelier option as the RSPO is currently revising the Certification Systems document and developing a new curriculum for the P&C Lead Auditor training.

Develop additional protocols and support resources for auditors

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May include:

1. Lists of stakeholders for main countries and regions to consult in regard to labour issues. The lists could be linked to National Interpretations.

2. Guidance on how stakeholder consultations should be conducted in the preparatory stage and during the field audit, as recommended in the *ISEAL Code of Good Practice*.

3. Advice for auditors to deal with difficult situations with stakeholders.

4. Suggestions for online sources to find information for the initial research or finding ongoing conflicts and grievances to inform the risk assessment.

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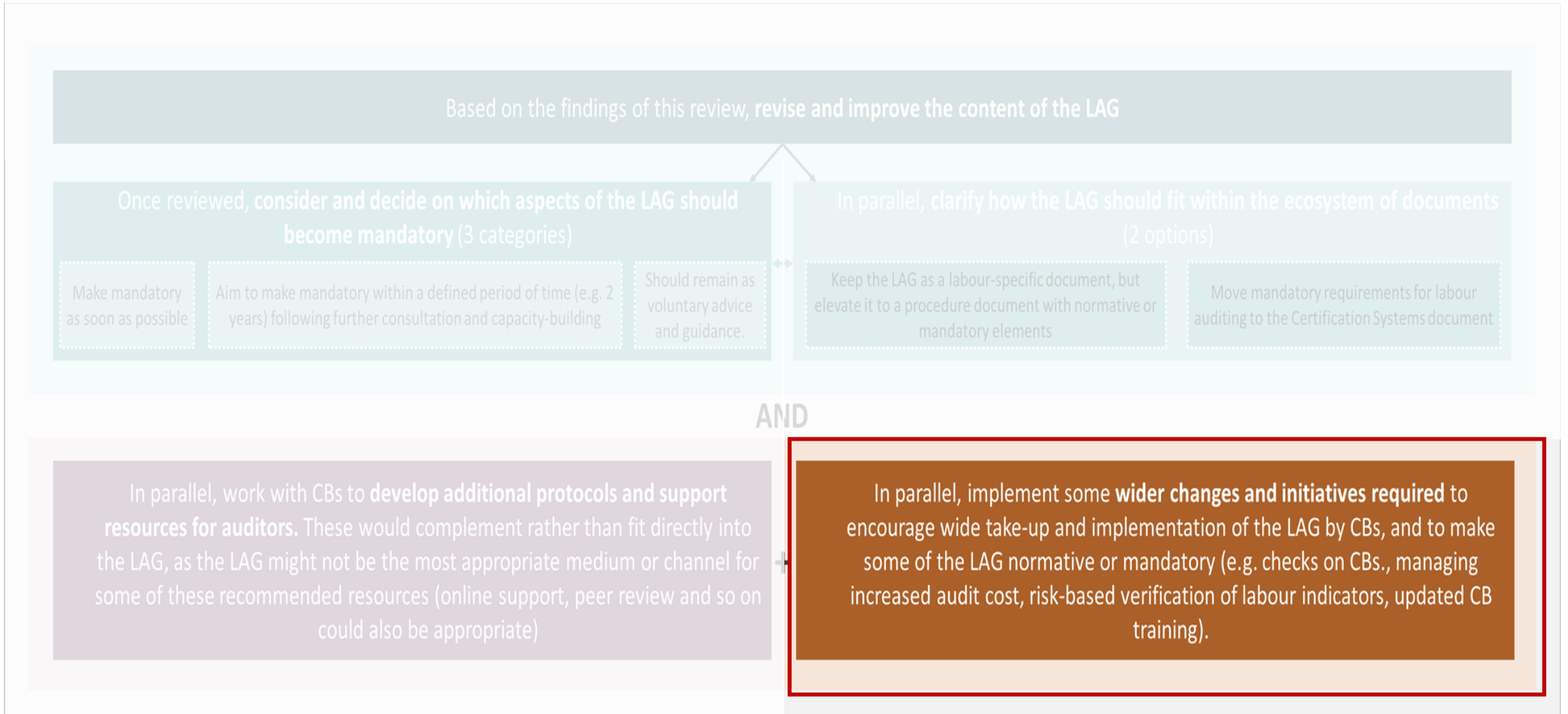
5. Guidance on how to better integrate findings from desk reviews into audit reports.

6. A protocol for auditors to respond if workers contact them. Better Cotton provides just one example of this.

7. Advisory channels and calibration mechanisms to support audit teams to reach conclusions:
   a. Guidance or a procedure to help ensure consistent interpretation of labour-related indicators by individual auditors;
   b. Guidance on any exceptions to requirements for triangulation in instances of certain labour issues;
   c. A protocol for withholding sensitive or uncorroborated findings from closing meetings.

8. Clear procedures for auditors to respond if access to workers, documents or physical premises are blocked by the Management Unit before or during the audit.

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Encouraging LAG Implementation:
- Plan to verify CBs and auditors follow mandatory LAG requirements.
- Draw on experiences from other standards bodies.

Stakeholder Consultation:
- Address issues of auditors being accompanied by company staff and conducting off-site worker interviews.

Managing Audit Costs:
- Develop models for managing increased audit costs.
- Explore Shared Responsibility mechanism.
- Establish tiers of producers based on size and capacity

Minimising Cost Impacts:
- Focus RSPO certification audits to cover less ground.
- Prioritise high-risk labour issues (e.g., child welfare, harassment, social security for vulnerable workers).

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Auditor Training:
- Continue developing auditor training on labour auditing techniques.
- Promote training of female auditors.
- Introduce metrics/KPIs for CBs to recruit and train female auditors.
- Develop training in gender-sensitive auditing techniques.

Year-Round Information Sources:
- Connect audits to wider, year-round sources of information.
- Explore year-round monitoring, worker voice technology, NGO collaboration, human rights due diligence, and deep dive research.

Contact

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