

Module 2. Assess and address child labor

How to implement child labor due diligence

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**RAINFOREST
ALLIANCE**



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This module is the second in the series of six modules to support farms in their child labor due diligence efforts. For further information about other modules, please refer to below overview:

[Module 1: What is child labor: Understanding the root causes of child labor](#)

[Module 2: Assess and Address Child labor: How to implement child labor due diligence](#)

[Module 3: Risk Assessment: How to assess the risk of child labor](#)

[Module 4: Mitigation: How to prevent child labor risks](#)

[Module 5: Remediation: How to respond to cases of child labor](#)

[Module 6: Monitoring: How to monitor child labor risks](#)

[Workbook: Risk Guidance and practical exercises](#)

[Annex A: Engaging with Children](#)

[Annex B: Business Frameworks](#)

[Annex C: Resources](#)



ASSESS AND ADDRESS CHILD LABOR

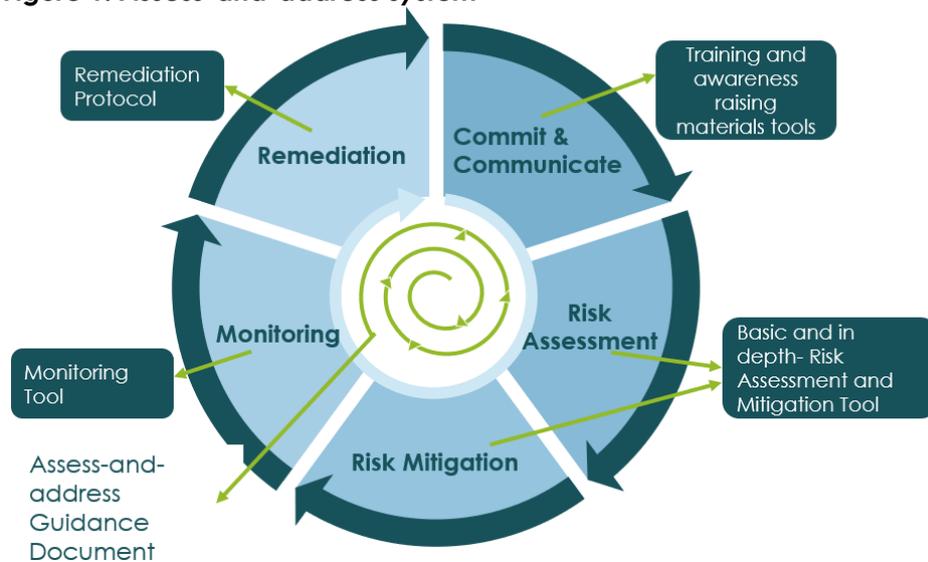
This section explains what RA certified farms and group members must do in order to manage child labor risks, by following the 'assess-and-address' system. This approach is set out in Chapter 5 of the 2020 Sustainable Farm Standard and it involves 5 major steps: 1. making a commitment to prevent child labor, 2. assessing and 3. mitigating your risks, 4. remediating actual cases of child labor, and 5. monitoring what you are doing.

What is child labor assess-and-address?

The Rainforest Alliance 2020 Sustainable Agriculture Standard requires farms or groups to establish an Assess-and-address system to prevent child labor, as well as other related abuses of discrimination, forced labor and workplace violence and harassment. This system is designed to manage the risk of child labor and other labor abuses which are not tolerated on RA certified farms.

Look at the diagram below. It provides an overview of the key elements of the Rainforest Alliance assess-and-address due diligence approach.

Figure 1. Assess-and-address system



In practical terms, assess-and-address for child labor is a set of due diligence measures, including risk assessment, mitigation measures, monitoring and remediation of actual cases. It is a risk-based approach that has proven to be more effective in preventing child labor than a simple prohibition and punitive approach. When severe cases of violations of the standard occur, certification may be withdrawn or suspended.

For more information about Assess-and-address and certification requirements, read the [2020 Sustainable Agriculture Standard](#), and [Guidance Document L: Assess-and-address](#)

The assess-and-address system draws on good practice developed through [ICI's Child Labor Monitoring and Remediation system](#). It is also aligned with the [UN Guiding Principles and Business and Human Rights](#) framework and with the [Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises](#).



The concepts behind assess-and-address

The following are the key concepts underpinning the effectiveness of the assess-and-address approach:

Key principles of assess-and-address	
Prohibition alone is insufficient	
	A punitive approach including immediate decertification after a case of child labor is identified can lead to farmers hiding child labor, making it harder to identify, remediate or prevent. This system incentivizes farmers to tackle child labor, through systematic steps, rather than hiding it.
A risk-based approach	
	Supporting farmers to understand their risks gives them better insights into the root causes of child labor in their local context, and what measures can prevent children from doing banned work. In this risk-based approach, mitigation measures correspond to the type of risk identified.
Continuous improvement	
	Instead of punishing farms that identify higher risks of child labor, Assess-and-address focuses on improvements that enable them to better reduce this risk. This shift in approach moves away from certification as a series of pass/fail requirements to a system that helps farms to improve the way they manage their local child labor risks over time.

Key takeaway:

RA has moved away from a zero-tolerance approach which can drive farms to hide child labor risks, and towards a **continuous improvement** model. This means taking a step-by-step approach to improving practices in response to actual risks and root causes of child labor in that local context.

Use the figure below to analyze why the risk-based Assess-and-address approach can be more effective at preventing child labor

Figure 2. Assess-and-address approach





Check your requirements

This guide focuses specifically on child labor. It sets out the practical steps that a farm needs to take in order to conduct child labor due diligence as part of the assess-and-address system.

First, there are three steps you need to take in order to identify your certification requirements.

Step 1. Understand the type of actions in assess-and-address

There are three types of actions involved in achieving certification:

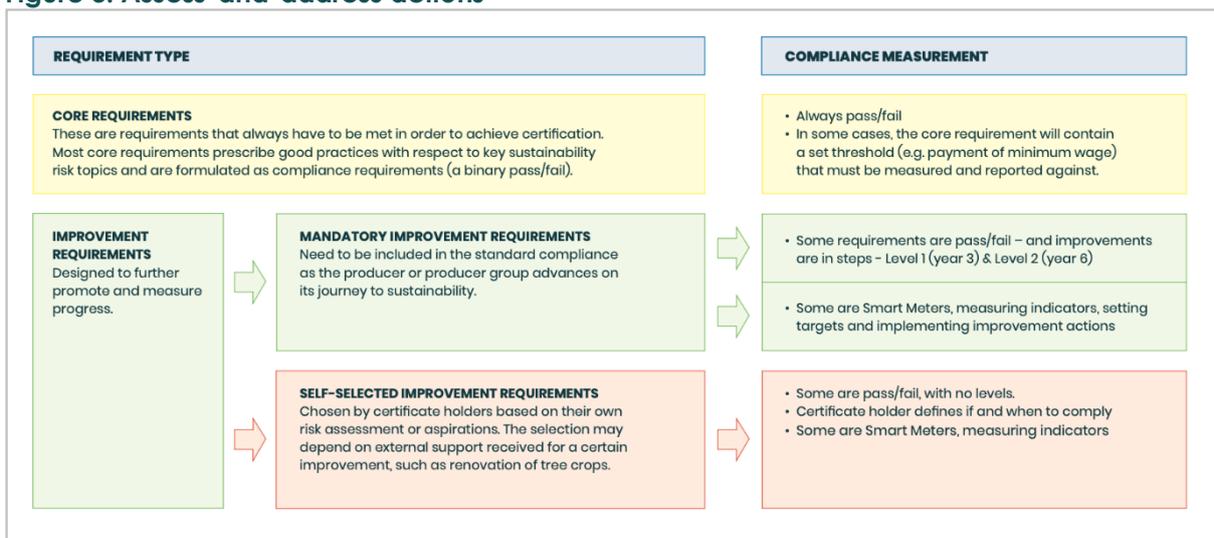
Core requirements – good practice requirements that must be upheld for certification, starting in Year 0

Mandatory improvements – good practice requirements applying to medium and high-risk settings to help members better prevent child labor, starting in Year 1 and onwards of certification. These also include ‘smart meter’ indicators.

Self-selected improvements – good practice measures chosen by the certificate holder based on their needs and aspirations, and according to their timeline

Look at the table to understand the types of actions necessary for compliance, how they are measured and timelines.

Figure 3. Assess-and-address actions



Step 2. Identify what risk category is given to your country and commodity.

If you are in a medium or high-risk category for child labor, this affects the actions you have to take to achieve certification. There are 4 mandatory improvements for child labor that may apply.

Child labor assess-and-address includes:

- 4 x core requirements
- 3 x mandatory improvements (if medium or high risk for child labor)
- 1 x mandatory improvement smart meter (if medium or high risk for child labor)

Step 3. Identify your category of certificate holder

The actions necessary for certification vary depending on whether the certificate holder is a small or large farm, or an individual certificate holder or under group management.



The table shows which types of actions apply to different certificate holders and risk categories.

Figure 4. Child labor assess-and-address actions

Actions	Risk rating	Group certificate holder			Individual certificate holder	
		Small farms	Large farms	Group management	Small farm	Large farm
5 x core requirements (5.1.1-5.1.4)	All	No	Yes	Yes	Yes	Yes
3 x mandatory improvements (5.1.5-5.1.7)	Medium or high-risk for child labor only	No	Yes	Yes	Yes	Yes
1 x mandatory improvement smart meter (5.1.8)	Medium or high-risk for child labor only	No	Yes	Yes	Yes	Yes

Once you have identified your risk rating and your category of certificate holder, you know what requirements you need to meet on child labor. To read about other steps you need to take to qualify for certification, please check the [Standard](#).

Key steps

Ensuring you have the appropriate capacity and ability to set up a due diligence system is important before you start. This section provides a summary of the key steps for child labor due diligence (more detail is available in Chapter 5 of the Standard) and guidance on how to prepare for and implement these steps. More in-depth guidance and information to strengthen your capacity is provided in each module covering these topics.

Use this checklist to identify where you may need extra resources or support. The table includes core requirements and suggested steps to take.

Figure 5. Suggested steps to meet core requirement on child labor

CORE REQUIREMENTS: CHILD LABOR	
Legend:	
	Core requirements
	Suggested steps to meet requirements
Commitment (5.1.1)	
	Appoint a management representative accountable for Assess-and-address
	Consider who in management has the necessary skills
	Set up an Assess-and-address committee including management, and also a representative of workers/group members who is selected by workers/group members
	Workers or group members select their own representatives in a transparent process e.g. through a worker organization or by election. Agree on timeline for regular meetings and reporting on your decisions and actions
	Committee members are knowledgeable about child labor, and impartial, accessible and trusted



	Ensure committee members complete online RA training on assess-and-address, and on child labor including national and international law Use monitoring to check workers/members perceive representatives as impartial, accessible and trusted
	Committee coordinates with management, grievance committee and gender person/committee
	Set up procedures for the committee to regularly coordinate with these persons/committee
	Raises awareness with management about child labor at least annually
	Provide training to management and staff on child labor Include child labor on the agenda of regular management meetings Monitor awareness raising with management in the Management Plan
	Publicly inform management and workers/members that child labor is not tolerated and that the Assess-and-address system is operational
	Consider how best to communicate this message to workers or group members e.g. display a poster explaining assess-and-address and that child labor is not tolerated Check the poster is in public places visible to workers or group members
Core requirements for child labor Risk mitigation (5.1.2)	
	Conduct basic farm risk assessment (1 x 3 years) or Supply chain risk assessment (annual)
	If necessary, train people conducting the risk assessment on child labor and assess-and-address Talk to key partners, including workers' organisations, to ensure information in the risk assessment is more robust, In year 0, consider what sources of information you can access, and document evidence for answers given. In future years you will be able draw on your stakeholders, internal inspections, self-assessments and monitoring reports.
	Implement corresponding mitigation measures
	Select the mitigation actions corresponding to your risks Assign timelines and persons responsible for each mitigation action Engage stakeholders to support different mitigation actions, including child protection specialists
	Track mitigation actions in management plan
	Include risks identified, mitigation actions, person responsible and timeline in Management Plan
Core requirements for child labor Monitoring (5.1.3)	
	Monitor the following: Risk of child labor; implementation of mitigation measures; implementation of remediation measures



	<p>Agree on what you will monitor e.g. risks identified, as well as mitigation and remediation actions</p> <p>Agree how and where you will monitor and who is responsible for this process (e.g. community-based monitoring, internal inspections)</p> <p>Train monitors to understand child labor</p> <p>Work with other organisations to support monitoring</p> <p>Agree how often you will monitor & report to management</p> <p>Use the Management Plan to track any additional mitigation actions arising from monitoring</p> <p>Use and complete the monitoring tool provided</p>
	Report potential cases of child labor to management and the grievance committee
	Document reporting of potential cases
	<p><i>Document information for required indicator:</i></p> <ul style="list-style-type: none"> • The number of potential cases identified by the monitoring system and referred to the Grievance Mechanism (by gender, age, and type of issue)
	Use the Management Plan and Monitoring Tool to track progress and record number of potential cases monitors identified and reported
Core requirements for child labor Remediation (5.1.4)	
	Set out remediation steps in the management plan
	<p>Train all committee members on the Remediation Protocol and child protection guidelines</p> <p>Decide who is responsible for remediation and set out your response plan for child labor cases in the Management Plan</p>
	Remediate and document confirmed cases in line with the Remediation Protocol
	<p>Identify stakeholders who can support with remediation</p> <p>Discuss and agree on the resources or external support necessary to remediate actual cases of child labor, including child protection experts</p> <p>Discuss and agree on potential remediation options for typical child labor scenarios</p> <p>Ensure that remediation cases are included in the monitoring plan</p>
	<p><i>Document information for required indicator:</i></p> <p>Number and percentage of confirmed child labor cases remediated per the Remediation Protocol (by gender, age, and type of issue)</p>
	<p>Establish a system to document each stage of the remediation process is in line with remediation protocol</p> <p>Check monitoring of remediation cases</p>

Key steps for higher risk farms

There are an additional set of mandatory improvements which apply to groups and farms in countries, that are considered medium or high risk for child labor in certain crops. These measures are designed to help these farms manage these higher risks, for example, through an in-depth farm assessment of child labor, checking the good functioning of the assess-and-



address system, and requiring additional training of group members and workers on child labor.

If you are in a medium or high-risk category for child labor, use this checklist to identify what steps you can take to complete mandatory improvements and where you may need extra resources or support.

Figure 6. Suggested steps to implement Mandatory Improvements for child labor

MANDATORY IMPROVEMENTS	
Legend:	
Core requirements	Suggested steps to meet requirements
Mandatory improvement 5.1.5 In-depth farm risk assessment	
	Conduct in-depth farm risk assessment (1 x 3 years), starting in Year 1
	Train risk assessment team on child labor Identify stakeholders who can provide information for the assessment Consult workers or their representatives, and any workers who are vulnerable e.g. women, migrants Collect information from other sources e.g. monitoring reports, grievance committee reports, internal inspections, self-assessment, management capacity checklist, audit. Document evidence for answers
	Implement corresponding mitigation measures
	Select the mitigation actions corresponding to your risks Assign timelines and persons responsible for each mitigation action Engage stakeholders to support different mitigation actions, including child protection specialists
	Track in management plan Complete by Year 3 (Level 1)
	Include risks identified, mitigation actions, person responsible and timeline in Management Plan
Mandatory improvement 5.1.6. Training and awareness raising about child labor	
	Conduct training/awareness raising about child labor with all group members (small farms) or workers (large farms/individually certified farms) Complete by Year 3 (Level 1)
	Agree on a training plan and communication materials on child labor for your farm/group members Include training plan in the Management Plan, with timelines Document number and type of training sessions provided and attendance lists
Mandatory improvement 5.1.7. School attendance Applies to group management only	
	Encourage school attendance of children of group staff, members and workers Complete by Year 3 (Level 1)
	Check internal inspection to assess number of children not in school regularly Identify root cause of non-attendance and plan mitigating activities (e.g. awareness raising, working with local authorities to improve transport or school access etc) Include schools plan in the Management Plan, with timelines Document number and type of activities undertaken by assess-and- address Committee to promote education



Mandatory smart meter

5.1.8. Assessment of Assess-and-address system

Conduct annual assessment of the assess-and-address system (1 x 3 years, starting in Year 1)

Check effectiveness of the following:

1. implementation of mitigation measures
2. training on child labor
3. cooperation with external actors
4. monitoring of assess-and-address system and
5. internal collaboration.

Document information for required indicator:

Scores on the above 5 issues

Using the Smart Meter table, assess the functioning of the Assess-and-address system for each of the 5 elements, selecting the appropriate step.

Select corresponding improvement targets and activities and assign timelines and a person responsible.

Include the activities in the Management Plan, with timelines and person responsible

Document the assessment and evidence for scores received