

RAINFOREST ALLIANCE

POLICY AND GUIDANCE TO CONDUCT INVESTIGATION AUDITS

August 2020

Version 1.0



**RAINFOREST
ALLIANCE**



Issue Date:	Binding date:	Expiration date
17 August 2020	17 August 2020	Open – until next review
Developed by:		Approved by:
Standards and Assurance		Director, Standards and Assurance
Linked to (code and name of documents, if applicable):		
<ul style="list-style-type: none"> • Rainforest Alliance Sustainable Agriculture Standard For farms and producer groups involved in crop and cattle production, July, 2017 Version 1.2 • Chain of Custody Policy, Rainforest Alliance, version 3 • Rainforest Alliance Certification Rules, For Single Farms and Group Administrators, July 2017, Version 2. • Rules for Planning and Conducting Audits Farms and producer groups involved in crop and cattle production, April 2018 Version 1 • Rainforest Alliance Grievance Procedure • RA-P-SP-2-V3.2 Policy on Auditing Methodologies for Freedom of Association and Trade Union Freedom 		
Applicable to:		
All Certification Bodies (CBs) authorized by Rainforest Alliance.		
Regions:		
All		
Crops:	Type of organizations:	
All	Individual farms, group of producers and chain of custody operators / chain of supply actors (ACS).	

[More information?](#)

For more information about the Rainforest Alliance, visit www.rainforest-alliance.org or contact info@ra.org

[Translation Disclaimer](#)

Translation accuracy of any Rainforest Alliance sustainable agriculture certification program document into languages other than English is not guaranteed nor implied. Any question related to the accuracy of the information contained in the translation, refer to the English official version. Any discrepancies or differences created in the translation are not binding and have no effect for auditing or certification purposes.



1. INTRODUCTION

Rainforest Alliance is a growing network of people who are inspired and committed to working together to achieve our mission of conserving biodiversity and ensuring sustainable livelihoods. For more information about Rainforest Alliance, visit its website: <http://www.rainforest-alliance.org>

This document contains the binding clauses that Certification Bodies (CBs) need to comply with when conducting an investigation audit of any Certificate Holder certified against any of the standards of the Rainforest Alliance¹ (hereinafter referred as the audited organization). It also sets out the responsibilities of the Rainforest Alliance in relation to the conduct of Investigation audits. These rules are additional to the existing Rainforest Alliance Certification Rules for Single Farms and Group Administrators, July, 2017 Version 2, and Rainforest Alliance Rules for Planning and Conducting Audits, April, 2018, Version 1.

Further guidance on how on how to conduct an Investigation Audits is provided in the annexes I and II.

2. INVESTIGATION AUDIT DEFINITION

An investigation audit is a non-regular audit process, conducted at any time, by a CB or directly by Rainforest Alliance, as a result of a complaint, reported incident or important information (hereinafter referred to as the complaint), about the performance of a certified organization, that the Rainforest Alliance or the Certification Body believes might jeopardize the credibility of the certification program.

3. GENERAL CONDITIONS

- a. Chapter 6.5 of [Rainforest Alliance Certification Rules for Single Farms and Group Administrators, July 2017, Version 2](#) applies.
- b. An investigation audit will be conducted after a complaint (see definition in chapter 2 in this document) is found eligible as determined by Rainforest Alliance.
- c. Rainforest Alliance reserves the right to combine (or to authorize the CB to do so) an investigation audit with a regular audit when a regular audit is already scheduled.
- d. If the complaint against the audited organization is confirmed during the audit process, all costs resulting from the investigation audit shall be covered by the audited organization. Otherwise, the CB will cover the costs.
- e. Investigation audits are unannounced, however, Rainforest Alliance, or the CB on its behalf, may notify the audited organization, no more than 48 hours before the audit takes place.
- f. If a notification is made, it shall be made in writing and in a period no longer than 48 hours prior to the audit. The notification letter shall include the date when the investigation audit

¹ Rainforest Alliance Sustainable Agriculture Standard, For farms and producer groups involved in crop and cattle production, July, 2017 Version 1.2

Rainforest Alliance Chain of Custody Standard, July, 2015 Version 3



will take place and the consequences resulting from rejecting the audit or from any action involving attempts to disrupt the audit process.

- g. The audit plan must be shared with the audited organization at the time of arrival at the organisation's office. Acknowledgement of receipt of the audit plan by the audited organization shall be requested before initiating the audit.
- h. The audited organization may reject the investigation audit and request it to be rescheduled for proven reasons of force majeure². Rainforest Alliance, or the CB on its behalf, may decide to reschedule the audit immediately within 24 hours; if the organization rejects the audit a second time, the certificate shall be canceled immediately.
- i. Investigation audits shall be conducted on-site, however, Rainforest Alliance reserves the right to verify evidence remotely or to authorize the CB to do so.
- j. When the complaint relates to freedom of association issues, the Policy on Audit Methodologies for Freedom of Association applies.

4. SCOPE

- a. Chapter 4.4 of Rainforest Alliance Rules for Planning and Conducting Audits, April, 2018, Version 1, applies.
- b. The scope of the investigation audit concerns at least the standard criteria and farm(s)/sites or management unit(s) on which the complaint is focused.
- c. The Rainforest Alliance or the CB on its behalf, reserve the right to expand the scope of the investigation audit, to include other certification criteria where the risk of non-conformities exists and/or which have material bearing on the issues raised in the complaint.

5. AUDIT PREPARATION

- a. Chapter 5 of Rainforest Alliance Rules for Planning and Conducting Audits, April, 2018, Version 1, applies.
- b. The investigation audit must be completed, and a certification decision taken, within 2 calendar months from the time RA agrees to launch an investigation audit process.
- c. The CB will select an audit team with appropriate competencies to address the nature of the criteria or control points that are the object of the complaint. The selected audit team must be competent and familiar with the local context and the applicable law. The lead auditor shall have demonstrated experience with the production system or the type of operation of the organization to be audited and particular experience in the subjects covered by the criteria or control points to be evaluated, as well as communication and leadership skills. (See Annex I for guidance on composition of the Audit team)
- d. The Certification Body shall ensure that there is no conflict of interest with any member of the audit team, or the CB itself, and the organization that is being audited.
- e. The CB shall allocate the necessary time to conduct the investigation audit based on the size of the sample, the location of the main offices, as well as the farms/sites to be included and the complexity and level of risk of each operation. The auditor shall define a minimum number of interviews to be conducted on the visit to the site taking account of the number of workers and relevant external actors. The size of the interview sample may be adjusted

² Such as (but not limited to): natural disasters, political conflicts in a region, epidemics or where the producer/representative of the group/multi-site can demonstrate medical reasons or previous commitments limiting access to evidence



once the auditor confirms the presence and availability of personnel during the audit. (See Annex II for guidance on sample selection)

- f. The certification body must conduct a preliminary documentation review, including the applicable law, risk assessments and any related open/closed lawsuits involving the audited organisation linked to the criteria and control points to be evaluated.
- g. The audit plan shall clearly define: the objective, scope (organization, areas and processes), the criteria or control points to be evaluated, the location, as well as the dates, schedule and time foreseen for the activities to be implemented, including the opening and closing meeting along with the audit team roles and responsibilities. In addition, the audit plan will specify the methods that the auditor will use for collecting evidence, including information on the size and criteria for sample selection, Information and personnel required to be available during the visit and the requirement that the audited organisation will facilitate the access of the auditor to all facilities, staff and documents necessary to verify compliance.
- h. The preparation of the investigation audit shall consider the participation of the complaint submitter, as well as any other stakeholder relevant to the issue that leads to the investigation. The actors to be considered include, but are not limited to: social /environmental organisations, local authorities, representatives of the communities in which the organization to be audited is located, labor union representatives or another type of worker representatives (welfare committee, occupational health and safety committee, etc. Rainforest Alliance reserves the right to provide information from its own systems and interactions with stakeholders to the CB to inform the Investigation Audit process)
- i. If external parties are to be interviewed, the auditor shall establish contact with them prior to the on-site audit to coordinate the interview date and time and, if necessary, to manage any permit or authorization required for a visit. The auditor needs to be aware that this may reduce the surprise effect of an un-announced audits.
- j. The number of interviews to be conducted with third parties will depend on the nature of the complaint. Interviews with other stakeholders are counted independently from the interviews with workers and will be conducted.
- k. If interested parties refuse to participate in the investigation audit, the process shall be carried out as far as possible without their participation, in accordance with the audit plan. The auditor must ensure that, both in the closing log and the report, the situation is stated, indicating the reasons given by interested parties for not participating in each case. This also applies when the person or organization who issued the complaint is invited to be part of the investigation audit process but refuses to do so.
- l. When the investigation audit relates to sensitive issues – such as sexual harassment, discrimination, or psychological violence, the Rainforest Alliance Additional Social Auditing Methods for Workplace Sexual and Psychological Harassment and Violence applies.

6. AUDIT EXECUTION

- a. Chapter 6 of Rainforest Alliance Rules for Planning and Conducting Audits, April, 2018, Version 1, applies.
- b. The Lead auditor shall conduct an opening meeting before initiating the on-site audit process, to confirm that the representatives of the audited organization and the audit team agree on the objective, scope and activities planned for the audit. The conclusions of the opening meeting together with the name and signature of the attendees shall be recorded in the opening log.



- c. The Audit team shall inform the audited organisation that the confidentiality of participants will be respected, including the need to conduct interviews with workers privately in or outside the farm/site, if necessary.
- d. The auditor shall inform the audited organization who will receive the information on the investigation audit.
- e. The auditor shall confirm with the audited organization which communication channels shall be used between the CB and the audited organization, to ensure agile communication that supports an efficient and effective resolution of the investigation when follow-ups to the audit are needed.
- f. The auditor shall inform the audited organization that the audit process could be terminated in cases where the auditor perceives restriction on access to evidence, coercion, bribery or he/she feel that his/her safety is compromised.
- g. All interviews with workers on sensitive labor issues are only conducted in a confidential environment and without the presence of management staff.
- h. If the audit plan needs to be adjusted, the auditor may make the changes without the Rainforest Alliance or the CB approval, as long as these do not modify the objective and scope of the visit; any modification has to be registered in the log, indicating the reasons that generated it.
- i. The lead auditor will conduct a closing meeting with the representatives of the audited organization to present the audit findings and conclusions. The presentation of the audit findings and conclusions must provide sufficient detail to ensure that attendees identify, understand, and recognize the nature and scope of the non-conformities found against the relevant standard criteria.
- j. The auditor must explain the post-audit activities and timelines related to the preparation, review and approval of the preliminary report and the delivery of a certification decision. The auditor must also explain the system for management of appeals and the grievance processes for the CB and RA.
- k. If the audited organization disagrees with the audit findings or conclusions, the reasons for the disagreement shall be discussed at the closing meeting and, if possible, resolved. If a resolution is not possible, the lead auditor shall record them in the log.
- l. All audit conclusions along with the attendance list of the closing meeting shall be recorded in the formats established by the CB or RA and must be saved.

7. AUDIT REPORT AND REVIEW

- a. Chapter 7 of Rainforest Alliance Rules for Planning and Conducting Audits, April, 2018, Version 1 applies.
- b. The lead auditor shall prepare the report with the results from the audit using the format provided by RA or the CB and submit it to the respective entity no longer than ten (10) calendar days for review.
- c. The report shall include information about the number and type of interviews conducted during the audit, including the methodology for selection of the sample.
- d. The preliminary report submitted by the lead auditor will undergo a quality review. When the investigation audit is conducted by an RA auditor, RA will conduct the quality review; when the investigation audit is conducted by a CB, the quality review must be done by the CB. The reviewer, in addition to receiving the audit report, must have access to information on the complaint that led to the investigation audit, the audit plan, opening and closing logs and any other evidence that the lead auditor has attached to his/her report.



- e. The reviewer will verify that the auditor has submitted a complete, precise, concrete, and clear audit report, in which the audit findings and assessment of compliance are solid and evidence related to each criteria or control are identified. The reviewer will also take account of any divergent opinion without resolution between the audit team and the audited organization.
- f. The reviewer shall inform the lead auditor in writing of the results of the review and request any clarification or adjustment before issuing its approval, in a maximum of five (5) calendar days following receipt of the report.
- g. If requested, the CB must share with RA the initial version of the audit report prior to sending it to the audited organization.
- h. Once the report is approved by the quality reviewer, the final version will be sent to the audited organization for review and approval, before a certification decision is taken. The audited organization may make observations on the findings of the report and provide feedback to the CB about the audit process. The audited organisation may not submit additional evidence or documents that have not been verified during the audit. The review and approval period of the report shall not exceed five (5) calendar days.
- i. The investigation audit engagement is kept up-to-date in SalesForce, or any other way of reporting established by Rainforest Alliance. At the end of the process, the engagement is closed, and the respective documents are uploaded, including the public report.
- j. The CB shall share with RA the final version of the audit report prior to it being sent to the audited organization.



ANNEX I – GUIDANCE ON COMPOSITION OF INVESTIGATION AUDIT TEAM

The nature of the criteria, object of the complaint, will define the profile of the audit team required for conducting the audit, including the competences of the specialist that could support the interpretation and analysis of the evidence, if necessary.

The following table (table 1) summarizes the role and responsibilities of different members of the investigation audit team:

Table 1. Composition of the Audit team: roles and responsibilities

ROLE	RESPONSIBILITIES
Certification Body	<ul style="list-style-type: none">✓ Issues the certification decision✓ Reception of complaints✓ Audit planning✓ Technical review of the report
Reviewer / Certifier	<ul style="list-style-type: none">✓ Conduct the quality review of the audit reports and ensure that accurate and consistent information is recorded in the Certification Database.✓ Notify the auditor team of any inaccuracies in the non-conformities evaluated in the audit report.✓ Propose improvements to the Certification Manager in the certification process for the audit quality review and auditor competence.
Lead Auditor (CBs or RA)	<ul style="list-style-type: none">✓ Audit preparation✓ Audit implementation✓ Audit report writing
Specialist (External, CBs or RA)	<ul style="list-style-type: none">✓ Supports the auditor by interpreting the evidence from his/her education and experience in specific subjects of the Standard (e.g. Lawyers, Environmental/Industrial Engineers, Biologists, Sociologists, etc.)
Translator (External, CBs or RA)	<ul style="list-style-type: none">✓ Supports the auditor with the communication with workers and representatives of the different stakeholders when the auditor cannot speak the local language.



ANNEX II- GUIDANCE ON EVIDENCE AND SAMPLE SELECTION

The following tables are guidance for the aspects that must be considered for evidence triangulation and sample selection (table 2) and Parameters for the interview sampling calculation in an investigation audit (table 3).

Table 2. Guidance on evidence and sample selection

COLLECTION METHOD	SOURCE OF EVIDENCE	ASPECTS TO BE CONSIDERED FOR SAMPLING
INTERVIEWS	At group level/multi-site scheme	
	<ul style="list-style-type: none"> ✓ Producer members ✓ Representative of committees ✓ Internal auditors ✓ Executors ✓ Other workers 	<ul style="list-style-type: none"> ✓ Number of farm members ✓ Number of executors and internal auditors ✓ Number of products/processes certified ✓ Group Governance-Organizational structure/ /multisite scheme ✓ Training responsibility of members/sites ✓ Continuous improvement responsibility for the members/sites ✓ Traceability responsibility and custody of the Certified product
	At farm/site level	
	<ul style="list-style-type: none"> ✓ Representative of management ✓ Representative of workers ✓ Workers ✓ Family of workers living in the farm/site ✓ Representative of the community ✓ Representative of local social/environmental agencies ✓ Representative of the complainant ✓ Contractors 	<ul style="list-style-type: none"> ✓ Number and type of workers. ✓ Organizational structure of the management system ✓ Gender, age, and race/ethnicity of the workers (sociodemographic profile) ✓ Number of members in the household, in case of small producers. ✓ Hiring of permanent force labor. ✓ Hiring of temporary force labor. ✓ Presence of workers housing. ✓ Presence of collective bargaining organizations/agreements ✓ Staff responsible of the implementation of processes. ✓ Staff responsible of record preparation and control.
At community level		
<ul style="list-style-type: none"> ✓ Community members ✓ Service providers ✓ Representatives of the communities ✓ Representatives of local social/labor/environmental agencies ✓ Representatives or user of communitarian entities, such as 	<ul style="list-style-type: none"> ✓ People or Entities directly affected (positive and/or negatively) by the activities in the farm/site audited. ✓ People or organizations providing services to the farm /site audited. ✓ Entities that provide support at local level. ✓ Enforcement entities of legal compliance at local level. 	



	schools, health centers, associations, aqueducts, cultural centers, etc.	
OBSERVATION	<ul style="list-style-type: none"> ✓ Management facilities ✓ Certified product Processing and /or storing facilities ✓ Supply storing facilities ✓ Sanitary facilities ✓ Housing ✓ Production areas (e.g. lots, plots, etc.) ✓ Leased areas ✓ Conservation areas: areas with high conservation values, ecosystems, non-application zones, fallow lands. ✓ Collection and disposal sites (liquid and solids) ✓ Water catchment and supply sites 	<ul style="list-style-type: none"> ✓ Cultural labors/processes implemented during the audit. ✓ Inclined topography of production areas. ✓ Presence of conservation areas on the farm. ✓ Worker accommodations ✓ Production or purchase of non-certified products. ✓ Rental of facilities for storing of supplies or certified product. ✓ Existence of several supply storing sites. ✓ Handling of harvested product (reception, collection, pulping, selection, cleaning, disinfecting, waxing, packing, labeled, dispatch, etc.) ✓ Presence of populated centers or community facilities (e.g. schools, community health centers, aqueducts, etc.)
REVIEW OF THE DOCUMENTED INFORMATION	<ul style="list-style-type: none"> ✓ Plans, programs, and procedures related with the management system of the farm/site. ✓ Plans, programs, and procedures related with the social, environmental, and agricultural management of the farm assessed. ✓ Plans, programs, and procedures related with the chain of custody management system. ✓ Labor records: contracts, payrolls, workers files, affiliations to social security, work rules. ✓ Training records ✓ Records of supply use in the different tasks in the farm: fertilizers, agrochemicals, water, and energy. ✓ Records of purchase, storage, processing, and sales of Certified and non-certified product. ✓ Inventory of certified and non-certified product. ✓ Traceability reports of RA commercial websites ✓ Transaction certificates issued from the RA commercial websites ✓ License agreements for the use of RA seals and trademarks 	<ul style="list-style-type: none"> ✓ Child labor risk ✓ Workers in the sample of interviews ✓ Sub-contracted ✓ Validity of the labor union agreements, if applies ✓ Recent changes to management/labor conditions of the farm/site ✓ Allegations/complaints before local agencies (related files) ✓ Periods in which the situation related with the complaint was noticeable ✓ Validity of the existing environmental permits ✓ Changes in the property and soil use. ✓ Programs and procedures applicable to the audited activities ✓ Estimated yield for the zone where the audited farm is located ✓ Productivity of the farm during the last two harvests ✓ Harvest period ✓ Scope expansion of the existing certificate ✓ Use of the seal and trademark on certified product



Table 3. Parameters for the interview sampling calculation in an investigation audit

Number of workers ³	Size of the sample	Sample Stratification	Length of the interview
<= 100	10% of the labor force or 5 workers minimum, whichever is greater.	<ul style="list-style-type: none"> ➤ Sample selection shall consider workers in operative positions, administrative or manager positions shall not be included in this estimation, even if they will have to be interviewed. 	<p>The length of an interview will depend on the subjects addressed at each case. Nevertheless, taking into consideration the time of the audit itself, it shall consider at least 15 minutes for individual interviews and no more than 40 minutes for group interviews.</p>
101-500	7% of the labor force or 10 workers minimum, whichever is greater.	<ul style="list-style-type: none"> ➤ Within each sub-group (permanents/temporary/sub-contracted) interviewed shall be considered proportionally, aspects such as gender, age and race/ethnicity of the workers. 	
501-1.000	5% of the labor force or 35 workers minimum, whichever is greater.	<ul style="list-style-type: none"> ➤ Up to 33% of the interviews can be in groups of no more than five people. 	
> 1.000	3% of the labor force or 50 workers, whichever is greater.	<ul style="list-style-type: none"> ➤ In case several workers organization exist, the sample shall be distributed proportionally among the workers members, including their representative and those that are not. The interview with labor union representative shall be conducted independently from the affiliated workers. 	

³ The calculation of the total number of workers should include permanent, temporary, and subcontracted.