

# Module 3. Risk assessment

How to assess the risk of child labor

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**RAINFOREST  
ALLIANCE**



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This module is the third 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](#)



## RISK ASSESSMENT

Conducting a risk assessment is a core requirement and central to a successful assess-and-address approach.

This module explains the child labor element of the Rainforest Alliance basic and in-depth farm risk assessment and how it identifies key risks and corresponding mitigation actions. It also provides step-by-step guidance on how to prepare for and conduct a risk assessment.

### What is a child labor risk assessment?



#### Core requirement:

- To conduct a basic farm risk assessment at least every three years (5.1.2)
- To include in the management plan (1.3.2) both the risks and mitigation actions identified in the risk assessment
- To implement the mitigation actions
- If the farm is medium or high risk for child labor, then in year 1 of certification, the management representative/ committee conducts the in-depth farm risk assessment and implements mitigation measures. This is repeated every three years.

Please see [Annex S03: Farm Risk Assessment Tool](#)

A risk assessment is a tool that investigates issues that can result in risks to compliance with the Rainforest Alliance Sustainable Agriculture Standard.

The child labor section of the basic farm risk assessment, in the assess-and-address system, consists of four questions that ask the following:

Focus of question	Groups	Large farm / estate
<b>Age verification</b>	Is there a risk that farm group members are not validating hired workers' ages at the time they are appointed?	Does the site require proof of age and make note of this when hiring workers?
<b>Hazardous work</b>	Has the group management listed any tasks, processes or other working conditions that could be hazardous to young workers?	Has the farm management listed any tasks, processes or other working conditions taking place on the farm that could be hazardous to young workers?
<b>Education</b> (Use the map of the farm / group area to assess this)	Is there a risk that school-going aged children of group staff, or group members, or children of workers, do not attend school within a safe walking / traveling distance?	Are children living on-site and of school-going age going to school within safe walking distance or at reasonable traveling distance using safe transport?



<b>Family work</b>	Is there a risk that under-18s perform work on any of the farms within the group?	Is there a risk that under-18s perform work on the farm?
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By asking these questions, the risk assessment helps you to understand whether there is a risk that children are working when they are too young or should be in school, or that children are doing banned, hazardous tasks that can harm them.

When you know and understand the particular risks you face, you can take targeted actions to address or 'mitigate' them. The basic farm risk assessment contains a set of recommended 'mitigation actions' for every risk. These mitigation actions are tailored to the type of farm you are: they are different for groups than for large farms. They are further tailored to the level of risk the farm is exposed to. The higher the risk, the more mitigation steps there will be. If you implement these actions effectively, you can reduce the likelihood that children will do work that is banned. As mitigation actions are designed to prevent child labor, they will also form part of any remediation plan you develop in response to an actual case of child labor to make sure it doesn't happen again.

The questions in the risk assessment are not meant to assess compliance; they are meant only to find ways to prevent non-compliances in the first place.

The risks you identify in the assessment, and the corresponding mitigation actions, should be recorded in your management plan so that you can coordinate and monitor what you do.

See: [Annex S03 Farm Risk Assessment Tool](#).

Use this box to remind yourself of what child labor means. For more information, read Module 1. What is Child Labor?

**Figure 1. What is child labor**

<b>What is Child Labor?</b>	
<b>IS Child Labor</b>	<b>Is NOT Child Labor</b>
<ul style="list-style-type: none"> <li>• Children of school-going age dropping out of school to work.</li> <li>• Children under age 18 working in hazardous conditions.</li> <li>• Children below legal minimum working age working on non-family farms. If the minimum age set in national law is higher than the Standard, the national law prevails.</li> </ul>	<ul style="list-style-type: none"> <li>• Children as young as 12 doing safe work for less than 14 hours a week that does not harm their health and development, and does not interfere with school.</li> <li>• Age-appropriate farming activities by children on their family's small farm, that do not interfere with school and are supervised by an adult.</li> </ul>

This flowchart sets out the key stages of conducting a risk assessment – getting ready and prepared, conducting the assessment to identify risks, and coordinating the results in the Management Plan so that you can take action to mitigate or remediation.

*Figure 2. Flowchart of risk assessment process*



## Check your requirements

There are two types of risk assessment in the assess-and-address due diligence framework: the basic and the in-depth Farm Risk Assessment.

### Year 0: Basic farm risk assessment

All certificate holders have to conduct a basic farm risk assessment in Year 0 of certification as it enables them to identify and mitigate child labor risks before their certification audit. Repeated once every three years.

### Year 1: In-depth farm risk assessment

Certificate holders in countries or farming crops that are categorised as medium or high risk for child labor have to conduct an in-depth risk assessment in Year 1 of certification. Repeated once every three years.

### Mitigation actions apply to every answer to every question on child labor

There are corresponding mitigation actions for every question on child labor in both the basic and in-depth farm risk assessments. Answering 'no' to a risk question does not mean you have no required mitigation actions. Instead, you will have mitigation actions designed to help you maintain your low risk situation.

See: [Annex S03 Farm Risk Assessment Tool](#)



**Key takeaway:**

For each question about risk in the Basic Risk Assessment tool there is a corresponding mitigation action, which is designed to help you prevent the risk becoming actual cases of child labor.

**Preparing for the risk assessment**

The year in which you conduct your risk assessment, as well as the type of risk assessment, will affect your planning and preparation. It is useful to bear these different challenges in mind as you prepare to conduct a risk assessment.

- Doing a basic risk assessment in Year 0, when you are still setting up all the assess-and-address tools, will be very different to when you repeat that basic assessment in Year 3, because by then you will have access to more information to answer the questions.
- Doing an in-depth assessment in Year 1 will also be different to doing your first basic assessment in Year 0 because you will have access to more information. But, it will also differ because it will require a greater mobilisation across your organisation to answer the more detailed, 'in-depth' questions.

The following are a set of good practice guidelines to help you prepare to conduct a risk assessment.

**GOOD PRACTICE GUIDELINES: Preparation for child labor risk assessment**



**Risk mitigation (5.1.2)**

**Identify who is accountable and responsible for risk assessment**

The Management is accountable and the assess-and-address committee is responsible for conducting risk assessments and implementing mitigation actions

Identify which Committee member is responsible for answering the child labor questions. Consider what this role involves: for the basic assessment, it means finding the information and/or working with others to find the information; for the in-depth assessment, it could also involve coordinating a wider team.

**How to select those responsible for risk assessment**

When choosing who to coordinate the risk assessment or conduct research it can be helpful to consider the following:

- *Knowledge:* Consider the person's experience on local farms and their knowledge of child labor
- *Relationships:* Consider their connections to group/farm management, farmers and local stakeholders
- *Gender:* Engage the support of the gender person/committee and women's groups to ensure your information is representative and also to widen your potential source of contacts
- *Follow-up:* Consider who can also support with implementation of mitigation actions
- *Training:* Is it necessary to provide training to those involved on child labor or any aspect of the assessment process?

**Identify what information you need and how to find it**

To answer the basic risk assessment questions on child labor, you need information about:

- How farms validate workers' ages when they are hired?
- If there is a list of hazardous tasks banned for children?
- If there is a school and if so, how far away is it?
- If it is typical for under-18s to work on farm/s?



Key sources of information include:

- Group/farm management documentation (policies, procedures, registry of workers, map of area)
- Local stakeholders e.g. teachers, farmers, agronomists, community leaders, women's groups, local authorities)
- Self-assessment (1.4.4. starting in Year 0)
- Management Capacity assessment (1.1.1 starting in Year 0, Group Mgt. only)
- Management Plan (1.3.2. starting in Year 0)
- Monitoring data (starting in Year 1)
- Internal inspection reports (1.4.1. starting in Year 1)

Identify how you will document and store data

When you collect information the risk assessment questions on child labor, take notes and document how you arrived at your answer. The auditor may ask for these records.

As far as possible, try to find a variety of different sources to verify your conclusions, for example, a combination of official documents, interviews and observation.

Store data securely and following data privacy and protection regulations

Never share any information about specific child labor cases publicly.

Use the table for good practice suggestions on how to find information to answer questions on child labor in the basic farm assessment.

**Figure 3. Basic farm risk assessment child labor questions**

**GOOD PRACTICE GUIDELINES: Answering child labor risk questions**



**Risk mitigation (5.1.2)**

**Age verification**

- Check with management if they have a policy or procedure for age verification
- Check verification involves identity documents, school or medical records
- Check how management communicates this policy or procedure e.g. posters, training etc
- Check internal inspection reports to see if workers' age of birth is being registered
- Check monitoring data
- Consult local stakeholders (e.g. agronomists, farmers, teachers)

**Non-attendance at school**

- Check the group map to identify if there is a school nearby
- Identify any farms where the distance from school could stop children from attending
- Check monitoring data
- Consult local stakeholders (e.g. teacher, headteacher, local authority, community organisations, women's group)

**Hazardous tasks**

- Check with management if there is a list of hazardous tasks banned for young workers
- Check how they communicate this list to farms
- Check monitoring data
- Consult local stakeholders (e.g. health centre, women's group)

**Risk of under-18s working on farms**

- Check with management that farms are informed about the difference between child labor and work permitted
- Check monitoring data
- Check management plan for progress on implementation of mitigation and remediation
- Consult local stakeholders (farmers, teachers, union representatives, community leaders, social services, agronomists, children)
- Consider if root causes of child labor might affect this area.



## Working with stakeholders

As you can see from the table, local stakeholders can provide essential information to identify child labor risks. Indeed, local stakeholders are fundamental to a successful Assess-and-address system.

Stakeholders are people who may be affected by farm decisions, or who can influence and support the actions farms take. They can help you understand why a child is doing tasks that are banned on a particular farm, and what action is appropriate for remediation. Stakeholders may also provide practical support because of the roles they have, for example, as teachers, in community organisations, or in child protection.

Stakeholder engagement can support your assess-and-address due diligence by helping you:

- Know and understand what child labor exists on your farms and its root causes locally and the region
- Understand how you can remediate actual cases of child labor
- Manage the risk with limited resources by gaining support and knowledge from others

### Stakeholder mapping

To find out who your stakeholders are, you undertake a process known as ‘stakeholder mapping’. This is a process by which you list people and organisations associated with the farm (workers, agronomist), local area (community leaders, local authority) and country as a whole (government, NGOs). Ensure that the stakeholders you include are people who will provide you with legitimate and trustworthy information.

### Complete the Stakeholder Mapping Exercise in the Workbook

The purpose of doing this is to identify people who can help you to prevent child labor happening on your farm/s. Consider who has information about different aspects of child labor and the root causes and who can help you manage child labor risks. For example, teachers can tell you what prevents children attending school, whereas local child protection organisations can support your remediation activities for victims of child labor.

Using the mapping exercise, identify which stakeholders can help to answer specific questions in the assessment. They might provide information you don’t have, or supplement and verify what you know.

**Figure 4. Stakeholder Risk assessment exercise**

Risk question	Information needed	Stakeholder	How to consult
Age verification			
Hazardous tasks			
Non-attendance at school			
Risk of under-18s working on farms			

### How to engage with stakeholders

The following are some key guidelines for engaging safely with stakeholders and building a sustainable relationship.





Consider how best to consult each stakeholder, for example, in official meetings, phone calls, community meetings, focus group discussions, village health centres, schools, farm extension services etc.

GOOD PRACTICE GUIDELINES: Engaging with stakeholders	
	Ensure your meeting is inclusive and representative
	<p>Include groups that may be marginalised (e.g. migrants, minorities) and ensure questions are culturally-appropriate</p> <p>Ensure you are asking questions to both women and men, boys and girls</p> <p>Allow for safe spaces for girls and women where they can speak freely about sensitive issues</p> <p>Ensure stakeholders are legitimate and trustworthy</p>
	Ensure that stakeholder engagement is voluntary by:
	<ul style="list-style-type: none"> <li>• Receiving any necessary permissions from government or community leaders</li> <li>• Asking stakeholders for their consent to engage</li> <li>• Agreeing what personal data and information can be used</li> <li>• Making sure everyone is clear on the purpose of the engagement</li> </ul>
	If you are interviewing children or engaging directly with children
	Follow the guidelines in Annex A (working with children) and ask for expert support from social workers, NGOs or others working with children. This will enable you to prioritise children's safety and use child-friendly tools for the consultation.
	Follow-up with the stakeholders you interviewed
	<p>It is good practice to follow-up with stakeholders to let them know how their information has been used and what action you are taking.</p> <p>If you have engaged with children, your follow-up should be in a child-friendly format.</p> <p>Report on the results of the risk assessment and what mitigation actions you are taking. The same stakeholders could play a key role in supporting implementation of these actions.</p>

**Key takeaway**  
 Note! It is important you consider when it is appropriate to engage with children or if it is better to engage with those who can speak on their behalf such as parents, guardians or child rights advocates. If you decide you need to engage with children, use the guidance in the knowledge guide annex A which provides guidance on how to do this safely.

*See: Annex A: Guidance on how to work with children*

### Understanding your legal and local risks

The operating context of a farm can increase or decrease the risk of child labor. Risks may increase if national law is not in line with international law or with Rainforest Alliance standards on child labor. For example, if the minimum age for work is lower than the



international standard, local farmers might employ children in child labor even though they are following national law.

Use the Legal Exercise in the Workbook to compare your national law to international law.

Risks of child labor are also affected by a combination of social, political and economic factors in the area that either push or pull children into the labor market. For example, if crop prices rise families may want children to work to earn the extra profit available.

Review Module 1. What is child labor, to assess what factors may increase risks in your area.

Understanding these legal and local issues before starting your risk assessment can help to prepare you to answer your questions effectively.

Analysing both the legal and local context can inform your understanding of risk. For example, if your assessment of local root causes identifies a large number of foreign migrant workers on farms, you will want to check that national law guarantees migrants the same working conditions as other workers. If it does not, migrant children may not be attending school and parents may be receiving very low wages.

Questions to consider if there are migrant workers at your farm/group:

- Does national law guarantee migrant workers the same rights and working conditions as other workers?

Similarly, if your analysis of the local context identifies a collective bargaining agreement for your crop workers, you may wish to check that it covers the wages, benefits and working conditions of migrant workers and young workers.

Questions to consider if there is a collective bargaining agreement at your farm/group:

- Does the collective bargaining agreement cover children and guarantee young workers the same rights and working conditions as other workers?

If you are unsure where to find information about your national laws, speak to RA, and/or UNICEF, ILO and the Department of Labor and Social Affairs, who will be able to advise you on the legislative framework for children working in agriculture in your country and region.

### Key takeaway:

Where the national law is stricter than the ILO Conventions on child labor, RA requires you to follow the national law;

Where the national law is less strict than the ILO Conventions, RA requires you to follow the ILO Conventions.

## Example risk questions and mitigation actions

The Risk Guidance in the Workbook provides farm management with a checklist of additional risk questions to help identify child labor risks. Each question has guidance explaining why the issue could be a risk of child labor. It also has a set of corresponding mitigation actions.



This resource can be used to help the Assess-and-address committee identify and understand potential risks, including and in addition to those in the Basic Farm Risk Assessment.

Many of the mitigation actions in the Risk Guidance can also be part of an effective remediation plan, designed to prevent child labor recurring.

[Go to the Workbook to use the Risk Guidance questions and mitigation actions.](#)

There are four topics which are covered in the Risk Guidance:

**Under-age work:** When children work or do tasks when they are under the legal minimum age for work.

Children aged 13- 15 years (or 12-14 years in some developing countries) are allowed to do light work for no more than 14 hours a week during school term time, and the work must be supervised and not interfere with school. Children younger than 13 years (or 12 years in some developing countries) are not allowed to work, except for when it is their parents' own farm, is light and supervised work and does not interfere with the child's education. Sometimes family work or light work can become child labor because the child cannot go to school, is working too long hours and doing tasks that are not safe or age appropriate.

**Hazardous work:** When children do tasks that have been banned because they are potentially harmful to children.

Children under the age of 18 are not allowed to do hazardous work or tasks because they can harm a child's physical, mental and social development. Hazardous work can include work that is dangerous, hot, unhygienic, at height, underground, involves long hours, or heavy loads, or working at night, or dangerous tools etc. Often people may not be informed about the tasks that are banned for children, and as a result, young workers may be doing hazardous work.

**Access to education:** When children miss school because they have to work.

In many rural communities, children drop out of school before the end of compulsory education because families cannot afford school costs, or the secondary school is too far away, or because the child has to work. If a child leaves school early, they are probably still under the minimum age for work, as this usually aligned with the end of compulsory schooling. This increases the risk that they will be in child labor. Also, children who work too hard while they are at school may be too tired to study or may drop out because they have to miss too many classes. Missing school harms children's long-term development.

**Assessing worker vulnerabilities on your farms – including to (the worst forms of) child labor:** Issues that can make children more vulnerable to (the worst forms of) child labor

The vulnerability of children is linked to a variety of reasons, such as the socio-economic context (e.g. poverty, parent illiteracy, crop prices (rise and fall)), whether they are subject to discrimination (e.g. migrants), or how well their permitted work is managed (e.g. family or light work). For example, children from poorer households are more likely to work in order to supplement household income or because adult labor is too costly. Thinking about the specific situation for children on your farm(s) can help you to identify children who could be at higher risk of child labor.



## Management Plan

Core requirement: Management Plan



The management representative/committee include in the management plan (1.3.2) both the risks and mitigation actions identified in the risk assessment

A Management Plan must contain:

The risks identified in your basic or in-depth risk assessment (See Basic Farm Risk Assessment/In-depth Farm Risk Assessment)

The corresponding mitigation measures (See Basic Farm Risk Assessment/ In-depth Farm Risk Assessment)

The Remediation Plan (See Remediation Protocol)

The Management Plan is an important basic, coordinating document, where you record your goals and actions in the due diligence process, and track your progress.

When you complete your basic farm risk assessment, you must record your risks and mitigation actions in the Management Plan. It is a core requirement to use the Management Plan to track implementation of risk mitigation, and also to set out your remediation plan (See Module 5; Remediation).

You can use the Management Plan to help coordinate and track all the various actions you have to take within certain timelines, by assigning actions, persons responsible, stakeholders who can support and completion dates.

**Figure 5. Example Management Plan, tracking risk and mitigation actions**

Management plan example Risk mitigation								
Risk	Mitigation action	Person accountable	Implementing person/s	Stakeholders supporting	Costs	Completion date	Last monitoring date	Monitoring comments
<b>No list of hazardous tasks</b>	Communicate list of hazardous tasks to workers/member	A&A committee member A	A&A committee member A	Women's Community leader, union rep, farmers	\$xx	Year 0 01.01.2021	01.06.2020	Completed 01.03.2020

In addition, if you find it helpful, you can include a section in your Management Plan to coordinate and track all the actions you have to take to complete child labor due diligence. You can use the core requirements and mandatory improvements as well as good practice guides to ensure you meet your certification goal.

**Figure 6. Example Management Plan, tracking overall activities**

Management plan example Overall								
Type	Action	Who accountable	Who implements	Stakeholder	Cost	Completion by	Last monitor	Monitoring comments
<b>Core Requirement</b>	Training of management on child labor	A&A committee member A	Community trainer	Women's Community leader	\$xx	Year 0 01.01.2021	01.06.2020	Training of all management completed 01.05.2020



<b>Mandatory improvement</b>	In-depth risk assessment (RA)	A&A committee member B	A&A committee member B and team	See RA plan	\$xx	Year 1 End of 2021	01.06.2020	In progress
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Use the example Management Plan sections in the Workbook to build your own plan.

To see the Remediation Plan go to the Workbook, or the Remediation Protocol