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# SOCIAL COMPLIANCE SYSTEMS FOR THE PALM OIL INDUSTRY:

## A TOOLKIT FOR IMPLEMENTATION BY SMALLHOLDER PALM OIL FARMS IN LATIN AMERICA





## ACKNOWLEDGEMENTS

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# INTRODUCTION

## ABOUT PALMA FUTURO

The Palma Futuro project works to improve the implementation of Social Compliance Systems that promote acceptable conditions of work and the reduction of child labor and forced labor in the palm oil supply chains. Led by grantee Partners of the Americas, sub-grantee Social Accountability International (SAI) is an implementing partner for the project in Colombia and Ecuador from 2019-2023. The project is also supported by sub-grantee JE Austin Associates. The expected outcomes are:

- Strengthened capacity of private sector partners in the Colombian and Ecuadorian palm oil sector to implement a robust Social Compliance System;
- Increased understanding, at regional and global levels, of promising practices in Social Compliance Systems in the palm oil supply chain.

Learn more: <https://palmafuturo.com/>

The handbook and accompanying toolkits are two of the final outputs from the Palma Futuro project. The handbook compiles good practices and lessons learned during the project—conducted with a select group of companies in Colombia and Ecuador—and publishes them as a public good, enabling palm oil employers throughout South and Central America to apply them in their own operations.

## ABOUT PARTNERS OF THE AMERICAS

Partners of the Americas is a Non-Governmental Organization (NGO) based in Washington D.C., United States, founded in 1964 with the aim of creating ties of regional cooperation and social development between the United States and Latin America and the Caribbean. Partners has more than 58 years of experience implementing cutting edge, multi-million-dollar programs and grassroots initiatives through a portfolio of donors and partnerships to promote social and economic change in the western hemisphere. In Colombia, specifically, POA has worked for over 50 years in the following areas: education and youth exchange; combatting child labor promoting youth leadership; and agriculture and food security.

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## ABOUT SOCIAL ACCOUNTABILITY INTERNATIONAL

Founded in 1997, Social Accountability International (SAI) is a global non-governmental organization advancing human rights at work. SAI's vision is of decent work everywhere—sustained by an understanding that socially responsible workplaces benefit business while securing fundamental human rights. SAI empowers workers and managers at all levels of businesses and supply chains, using its multi-industry SA8000® Standard, as well as Social Fingerprint®, TenSquared, and other training and capacity building programs. SAI is a leader in policy and implementation, working together with a diverse group of stakeholders, including brands, suppliers, governments, trade unions, non-profits, and academia. Website: [sa-intl.org](http://sa-intl.org)

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## ABOUT THIS TOOLKIT

This toolkit and the accompanying **handbook** are two of the final outputs from the Palma Futuro project. The handbook compiles good practices and lessons learned during the project—conducted with a select group of companies in Colombia and Ecuador—and publishes them as a public good. The toolkit consolidates hands-on templates, guides, checklists, examples, and general guidance to help readers apply those lessons within their own farms. If the handbook is the “why”, this toolkit is the “how”.

### Who should use it?

This toolkit is for **smallholder palm oil farms** in Central and South America that employ fewer than 50 workers, and can be used by those employees responsible for social and labor compliance.

**Medium-large palm farms** with 50 workers or more should refer to the customized medium-large palm oil farm toolkit. Employees at **palm oil extractor plants** should refer to the customized extractor plant toolkit.

### How should it be used?

This toolkit should be used in close conjunction with a handbook. Employees at smallholder farms are encouraged to use the outputs side-by-side, starting by reading the lessons in the handbook before using the toolkit. The **handbook** is broken down into four chapters:

**CHAPTER 1** Labor Compliance in Latin America’s Palm Oil Industry: Background on labor issues and Social Compliance Systems in the palm oil industry in Central and South America.

**CHAPTER 2** Introduction to Social Compliance Systems: Introduction to the Palma Futuro Social Compliance System (SCS), its key definitions and components.

**CHAPTER 3** Labor Performance Elements: Detailed information on labor standards relevant in the palm oil industry in Central and South America, including guidance to help companies implement the standards in each labor category.

**CHAPTER 4** Management System Categories: Step-by-step instructions on how to develop and implement an SCS, including links to accompanying tools.

This **toolkit** draws on lessons described throughout the handbook, but is specifically linked to the concepts introduced in Chapter 4 (Management System Categories). Each of the eight toolkit chapters correspond to one of the eight management system categories, broken down into sub-sections within the handbook’s Chapter 4. The following table details where to find the handbook section for each toolkit chapter.

TOOLKIT CHAPTER	Page	HANDBOOK SECTION	Page
Chapter 1: Allocating People and Resources	9	Section 4.1: Allocating People and Resources	121
Chapter 2: Assessing Risks and Impacts	14	Section 4.2: Assessing Risks and Impacts	128
Chapter 3: Developing Code, Policy and Commitments	28	Section 4.3: Developing Code, Policy and Commitments	134
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Chapter 8: Reporting on Performance	85	Section 4.8: Reporting on Performance	174

**ABOUT THE TOOLS**

Each tool offers step-by-step guidance for implementing the lessons from the Palma Futuro handbook. This guidance is presented in a range of different formats including: guided exercises, templates, protocols and more.

Despite the variation in format, the content of the tools is complementary and coordinated. They build on one another: much of the information gathered using tools in early chapters feeds directly into tools in later chapters. For example, Chapter 2 includes two different tools to identify impacts of those risks. Chapter 2 are actually manifest as issues in the workplace or management. Finally, tools in Chapter 7 will help farms on how to correct or remediate those impacts.

All the tools are designed to be customized by the users to fit their farm’s needs. If, for example, a farm has already conducted a comprehensive audit for a certification process, they may not need as much information provided in the Monitoring Tool (6.1) as a farm that has not. Farms should take what is useful to fill the gaps in their Social Compliance Systems.

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The Palma Futuro team hopes this toolkit boosts understanding of, appreciation for, and commitment to adequate working conditions throughout the Latin American palm oil sector.







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# 1

## INTRODUCTION TO ALLOCATING PEOPLE AND RESOURCES

Allocating people and resources to be responsible for your Social Compliance System (SCS) is key to its success. If you have enough employees, you should create a Social Performance Team (SPT), but if your farm is too small to assign the responsibility to multiple people, selecting only one person is acceptable.

This chapter includes the following tools:

### 1.1 ASSIGNING PEOPLE TO MANAGE YOUR SCS

This tool guides you through the process of selecting someone or a group of people to be in charge of your SCS. It then helps you define the scope of their job responsibilities.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.1.*



# 1.1 ASSIGNING PEOPLE TO MANAGE YOUR SCS

## Tool



**WHAT:** A guide to assigning responsibility for managing your Social Compliance System.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.1) of the Palma Futuro Handbook

**WHO:** Manager(s) of palm oil farms

**SCS CATEGORY:** Allocating People and Resources.

## INTRODUCTION

The first step toward creating your Social Compliance System (SCS) is assigning responsibility for the system to someone or a group of people in your organization. This group of people are called the Social Performance Team (SPT). For farms with multiple departments and distinct roles, the key is to involve people that represent the company's full range of functions. For very small operations, this may mean assigning responsibility to just one person.

This person, or group of people, should come from within your farm and will take on the responsibility of managing the SCS in addition to their typical job responsibilities.

## INSTRUCTIONS

The following exercise will help you define the role of the person or people responsible for managing your SCS. It will guide you through the process of creating a job profile, though instead of then posting that for hire, you will add the list of responsibilities you develop into the SCS-assigned person's job description. With that information, you can then select the person or group of people who will be responsible.

**Note:** Depending on the size of your farm, you as the farm owner or manager may adopt responsibility for managing the SCS. If this is the case, follow the steps below to get a better understanding of your responsibilities.

**STEP 1.** Review the following list of responsibilities for the person or people managing your SCS.

- Facilitate labor risk assessments.
- Conduct stakeholder identification, engagement and monitoring.
- Support the achievement of good labor performance (Child Labor, Forced Labor, Health and Safety, Freedom of Association and the Right to Collective Bargaining, Discrimination, Disciplinary Practices, Working Hours, Remuneration, and Regular Work) through the implementation of management systems.
- Be familiar with and have access to all documents and procedures related to your SCS.





- Periodically review policies, procedures, records, and indicators of each SCS component, and provide recommendations for improvements.
- Provide and be trained as needed on labor topics, management system concepts, and related skills as needed.
- Facilitate periodic internal and external audits, as well as continuous improvement, according to the corrective and preventive actions identified.
- Facilitate root cause analysis and help prepare corrective and preventive actions of issues identified through risk assessments, stakeholder engagement, grievance mechanisms, etc.
- Support the resolution of complaints.
- Coordinate the social performance reports.

**STEP 2.** Place a ‘check-mark’ next to each of the responsibilities in that list that you think are necessary to meet your farm’s needs. For example, if your farm is not aware of the specific risks to labor conditions it faces, you should check off “facilitate labor risk assessments.” You may end up checking off every responsibility.

**STEP 3.** Write all the responsibilities you checked off in the “Responsibilities” section of the Sample Job Description in **Annex 1.1** below.

**STEP 4.** Consider the skills the person should bring in order to be able to meet all the responsibilities of the position. Write these under the “Qualifications” section of **Annex 1.1** below.

**STEP 5.** Fill out general information about the position in the “General” section of **Annex 1.1** below, including who prepared the job description (“Prepared By”, which will be your name), when the person would begin working on the SCS responsibilities (“Start Date”), and where they would perform those duties (“Location of the Work”, which will most likely be at your farm). Then, write out the purpose of the position in the designated box in **Annex 1.1** below. This can be based on the information in the introduction to this tool, or in the Palma Futuro Handbook Chapter 4.1.

**STEP 6.** Based on these qualifications and responsibilities, select a person or group of people in your farm who will be in charge of managing your SCS. If you are selecting multiple people, ensure there is a representation of both supervisors and non-supervisors. Once completed, you will provide those people or that person with this sample job description.



**STEP 7.** Regardless of whether you selected one person or multiple people to be in charge of your SCS, consider how to balance their SCS responsibilities with their typical job responsibilities. For example, you could designate a day or two during the week when they have a lighter workload to dedicate a few hours to SCS responsibilities. Then, write this in the “Work Schedule” box in **Annex 1.1** below.

**STEP 8.** First order of business for the selected person or people should be to coordinate the completion of a farm-wide risk assessment. Proceed to the next chapter, Chapter 2, for tool 2.1, Sample Risk Assessment.

**Ongoing:** Remember to meet on a regular basis with this person to routinely discuss progress made and areas of improvement for your SCS.

**Annex 1.1:** Blank Template Job Description

GENERAL			
TITLE OF POSITION	Social Compliance System Monitor		
PREPARED BY			
START DATE			
LOCATION OF THE WORK		WORK SCHEDULE	
RESPONSIBILITIES			
PURPOSE OF THE POSITION			
RESPONSIBILITIES AND ACTIVITIES			
QUALIFICATIONS/REQUIREMENTS			
PREFERRED SKILLS			
EDUCATION			
EXPERIENCE			
OHS REQUIREMENTS			
PHYSICAL ABILITIES			
WORK CONDITIONS			
SUPERVISOR			
PERSONAL PROTECTIVE EQUIPMENT			
TOOLS REQUIRED			
OTHER CHARACTERISTICS			







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# 2

## INTRODUCTION TO ASSESSING RISK AND IMPACTS

Once you have assigned people or a person within your farm to manage your Social Compliance System, those people should facilitate the assessment of your farm's labor risks. Conducting regular labor risk assessments ensures that you are aware of any potential or actual labor issues, which in turn supports effective actions and allocation of resources in your SCS.

To do so, this chapter includes the following two tools:

### **2.1 PROCESS MAPPING TOOL**

The operational process mapping tool allows farms to identify potential risks at every step in their production process.

### **2.2 RISK ASSESSMENT**

The Risk Assessment provides a framework for assessing risks in each of the nine Labor Performance Elements of your SCS.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.2.*





# 2.1 OPERATIONAL PROCESS MAPPING TOOL

## INTRODUCTION

The Operational Process Mapping Tool guides companies to break each of their production process down into steps and then identify potential risks for each work activity.

Process maps are particularly useful in identifying the labor risks associated with your operations. They can also help you pinpoint inefficiencies within your workflow so that you can streamline processes and maximize productivity, which can benefit your production and your workers. Finally, it can also help farms comply with legislation in many countries that requires OHS risk assessment (though the scope of the process mapping extends beyond OHS, to all labor risks).

## INSTRUCTIONS

### 1. MAP THE OPERATIONS PROCESS STEP-BY-STEP

Breakdown your farm's operations into a step-by-step process of the work activities. An initial step could be planting the palm trees on your farms, maintenance of the plantation, agricultural tasks and harvesting, then delivery, and so on. If you have conducted an assessment of this type before, you can go beyond your own farm to include the labor activities in your supply chain. Otherwise, just stick with your farm's activities.

Then map those work activities to show the directional relationship between the steps. When mapping a process, draw a box for each step and connect them with arrows to show a flow. You can use an online tool or word processor to create a map or draw it by hand. A simple process map can be found below:

## Tool



**WHAT:** A guide to assessing a company's potential risks within every work activity.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.2) of the Palma Futuro Handbook.

**WHO:** Operational, Human Resources and OHS managers. SPT will coordinate.

**SCS CATEGORY:** Assessing Risks and Impacts.

## Note

You can also use the information gathered by this tool to answer the questions posed in the Procedure Template 3A.3 Health and Safety Checklist



# PALM OIL HARVESTING

## Process Map



Mature palm oil plantation



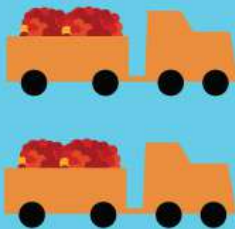
1 Palm oil fruit bunches in tree



2 Harvesting palm fruit



3 Loading palm fruit



4 Truck containing palm fruit



5 Delivering palm fruit to the processing facility



## 2. RISK IDENTIFICATION

Once you have broken down all the steps, you will then list the unique risks inherent to each step. You should consider asking the following questions at each step:

- What are the specific risks associated with this step of a work activity?
- Who are the stakeholders affected at this step of the process?
- What are the possible labor risks to said stakeholder(s)?
- What are the process changes necessary to address/mitigate those risks?

It is essential to include people from all levels of your farm in this activity. Supervisors and workers, especially, can offer valuable insight into the way things are actually done and the risks and stakeholders involved in their day-to-day work. If you can't bring everyone together to complete the process map, you should ask supervisors to consult with the workers they oversee to obtain their input, and then incorporate that information into the process map.

## 3. BRAINSTORMING SOLUTIONS

After you have identified the risks through this tool and your comprehensive risk assessment (see Tool 2.2), you can start to think of the possible solutions. These can range from revising your crop practices to better control the risks, to improving the use of personal protective equipment by your workers, to converting to organic practices or reducing the use of hazardous agrochemicals, and more. This information will form the basis for your Corrective Action Improvement Plan (Tool 7.3).

### Note

For example: say the work activity being mapped is delivering the harvested palm seeds from the supplier farms to the extractor plants.

**Step 1:** Transfer the palm oil seeds from the fields to the delivery vehicle.

**Risks to labor conditions at Step 1:** Being hit by falling branches, heat exhaustion, dehydration

**Step 2:** Drive the palm oil from the supplier farm to the extractor plant.

**Risks to labor conditions at Step 2:** vehicular accidents.



# 2.2 LABOR RISK AND IMPACT ASSESSMENT

## Tool



**WHAT:** A guide to assessing and mapping a company's potential labor risks workspace

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.2) of the Palma Futuro Handbook

**WHO:** OHS Manager, with operational managers and workers - Should be conducted by a professional with knowledge of how to conduct an OHS risk assessment

**SCS CATEGORY:** Assessing Risks and Impacts

### INTRODUCTION

A labor risk and impact assessment is a means of recognizing areas where labor violations are more likely to occur and therefore require special attention. Note that a risk assessment identifies and measures risk and potential impacts. It does not measure actual impacts i.e., cases where you have violated a labor standard. These will be uncovered through your monitoring and evaluation activities (Chapter 6).

Use the information from this tool to focus your attention on actions to prevent or respond to any potential negative impacts. You will use the tools in Chapter 6 and Chapter 7 of this toolkit to help you do so.

### INSTRUCTIONS

For this tool, you will need colored markers in black, red, yellow, orange, green and blue. For each instruction, (1) write the applicable answer under the designated column and then (2) shade over that answer with the applicable color. The "Potential Negative Impact by Labor Performance Element" column shows you the general risk areas that a specific risk could impact. Keep in mind that many risk factors might not represent a problem that you face now, but you should consider the potential of these risks to emerge in the future.



INSTRUCTIONS	COLUMN WHERE YOU PUT YOUR ANSWER	ANSWER OPTIONS	COLOR SHADING FOR EACH ANSWER OPTION
1. For each risk, determine the likelihood of that risk actually occurring.	<i>Likelihood of the risk factor (Almost Certain, Likely, Possible, Unlikely, Rare)</i>	<b>Almost certain:</b> This risk occurs often, but not 100% of the time.	Red
		<b>Likely:</b> We expect this risk to occur, but it might not.	Orange
		<b>Possible:</b> The risk could occur.	Yellow
		<b>Unlikely:</b> We do not expect this risk to occur, but it might.	Blue
		<b>Rare:</b> This risk does not occur, but there is a chance it could.	Green
2. Then, determine the potential impact on labor conditions if that risk were to actually occur.	<i>Impact of the risk factor (Severe, Major, Moderate, or Minor)</i>	<b>Severe:</b> This risk would have a critical impact on working conditions.	Red
		<b>Major:</b> This risk would have a considerable impact on working conditions.	Orange
		<b>Moderate:</b> This risk would have a manageable impact on working conditions.	Yellow
		<b>Minor:</b> This risk would have a slight impact on working conditions.	Green
3. Calculate the severity using the severity calculator below.	<i>Severity (Severe, Major, Moderate, Minor)</i>	<b>Severe:</b> This is a risk area of very high concern. It should be addressed immediately.	Red
		<b>Major:</b> This is a risk area of major concern.	Orange
		<b>Moderate:</b> This is a risk area of moderate concern. It could be addressed in the medium to long term.	Yellow
		<b>Minor:</b> This is a risk area of minor concern. You could address it in the long term.	Green





### SEVERITY CALCULATOR

LIKELIHOOD	IMPACT	SEVERITY
Almost Certain	Severe	Severe
Almost Certain	Major	Severe
Almost Certain	Moderate	Severe
Almost Certain	Minor	Major
Likely	Severe	Severe
Likely	Major	Severe
Likely	Moderate	Major
Likely	Minor	Major
Possible	Severe	Severe
Possible	Major	Major
Possible	Moderate	Major
Possible	Minor	Moderate
Unlikely	Severe	Major
Unlikely	Major	Major
Unlikely	Moderate	Moderate
Unlikely	Minor	Minor
Rare	Severe	Major
Rare	Major	Moderate
Rare	Moderate	Minor
Rare	Minor	Minor

### VISUAL REPRESENTATION OF SEVERITY CALCULATOR

Almost certain				
Likely				
Possible				
Unlikely			<b>DEFAULT RISK APPETITE</b>	
Rare				
	Minor	Moderate	Major	Severe



LABOR RISK AND IMPACT ASSESSMENT

RISK FACTOR	LABOR PERFORMANCE ELEMENT	LIKELIHOOD OF THE RISK FACTOR (ALMOST CERTAIN, LIKELY, POSSIBLE, UNLIKELY, RARE)	IMPACT OF THE RISK FACTOR (SEVERE, MAJOR, MODERATE, MINOR, INSIGNIFICANT)	SEVERITY (MAJOR, MODERATE, MINOR)
<b>LABOR AND WORKING CONDITIONS</b>				
There is a difference in nationality, race or religion between workers and managers.	Discrimination	Likely	Moderate	Major
	Forced Labor			
	Disciplinary Practices			
Our managers and supervisors are aware of few to none of the workers' rights under the national labor law or collective agreements.	Wages and Benefits			
	Regular Employment			
	Working Hours			
	Disciplinary Practices			
	Discrimination			
Workers' terms of employment are agreed upon verbally, rather than in a written contract	Wages and Benefits			
	Regular Employment			
	Working Hours			
	Discrimination			
If there is a written employment contract, only the employer has a copy of it (and the worker does not)	Forced Labor			
	Regular Employment			
We provide fewer social security benefits than required by law.	Wages and Benefits			
	Regular Employment			
We accept juvenile workers (workers under the age of 18).	Child Labor			
We have an apprentice program that provides young workers with training and work experience.	Forced Labor			
	Child Labor			
Some workers have children that accompany their parents during work or leisure time	Child Labor			
Children will or have occasionally join(ed) visitors to the farm.	Child Labor			
Female workers make up the majority of the workforce, while most managers and/or security staff are male workers.	Discrimination			
	Disciplinary Practices			
Workers enter and exit the workplace without recording the exact time they enter or exit.	Working Hours			
	Wages and Benefits			
Some workers are paid based upon the tasks performed (quota) rather than hours worked.	Health and Safety			
	Wages and Benefits			
	Working Hours			



**LABOR RISK AND IMPACT ASSESSMENT**

RISK FACTOR	LABOR PERFORMANCE ELEMENT	LIKELIHOOD OF THE RISK FACTOR (ALMOST CERTAIN, LIKELY, POSSIBLE, UNLIKELY, RARE)	IMPACT OF THE RISK FACTOR (SEVERE, MAJOR, MODERATE, MINOR, INSIGNIFICANT)	SEVERITY (MAJOR, MODERATE, MINOR)
We work with an employment agency or any third party to contract workers (including for jobs like security)	Discrimination			
	Forced Labor			
	Wages and Benefits			
If we work with an employment agency or any third party to contract workers (including for jobs like security), the terms are agreed upon verbally (there is no contract)	Discrimination			
	Forced Labor			
	Wages and Benefits			
Wages paid do not always meet the legal minimum wage or a level to meet the basic needs of a family.	Health and Safety			
	Child Labor			
	Working Hours			
We routinely hire temporary contract workers (as opposed to permanent basis).	Wages and Benefits			
	Regular Employment			
	Forced Labor			
Some of the workers are migrants from another area or immigrants from another country.	Wages and Benefits			
	Regular Employment			
	Working Hours			
	Forced Labor			
	Discrimination			
Migrant workers or seasonal workers are employed in more hazardous jobs	Discrimination			
We provide a dormitory for some or all of our workers.	Forced Labor			
	Wages and Benefits			
	Health and Safety			
The dormitories rarely or never inspected for their cleanliness, hygienic conditions, availability of adequate space, emergency signage, or safe drinking water and sanitation.	Health and Safety			
There is a shortage of housing for all who need it (including the families of the workers)	Forced Labor			
	Health and Safety			
Workers' free movement within and/or in/out of the dormitories is limited (for example, workers cannot leave the dormitories after a certain hour).	Forced Labor			



**LABOR RISK AND IMPACT ASSESSMENT**

<b>RISK FACTOR</b>	<b>LABOR PERFORMANCE ELEMENT</b>	<b>LIKELIHOOD OF THE RISK FACTOR (ALMOST CERTAIN, LIKELY, POSSIBLE, UNLIKELY, RARE)</b>	<b>IMPACT OF THE RISK FACTOR (SEVERE, MAJOR, MODERATE, MINOR, INSIGNIFICANT)</b>	<b>SEVERITY (MAJOR, MODERATE, MINOR)</b>
There are security guards at our farm.	Forced Labor			
	Discrimination			
There are large fluctuations in working hours based on work demand.	Wages and Benefits			
	Regular Employment			
	Forced Labor			
There is a labor shortage in the area.	Child Labor			
	Forced Labor			
The young people in the area generally would prefer to work in a non-agricultural sector in the future - for example, they want to move to the city.	Child Labor			
Our region does not have a strongly established union structure.	Discrimination			
	Freedom of Association			
There is no history of collective bargaining, unions or other forms of worker representation at our company.	Freedom of Association			
The union members have fewer benefits than non-union workers.	Discrimination			
	Freedom of Association			
There have been instances of workplace harassment or abuse	Disciplinary Practices			
We tolerate corporal physical punishment or verbal or physical coercion.	Disciplinary Practices			
Disciplinary measures have been taken against employees, but they have not been recorded in writing.	Disciplinary Practices			
Employees lack awareness of the rules of the workplace.	Disciplinary Practices			
The hiring, compensation and promotion of workers is based on who management likes, and not on the job requirements or workers' skills.	Discrimination			
There is no procedure for workers to express their complaints	Discrimination			
	Disciplinary Practices			
	Health and Safety			
The organization has done a collective dismissal in the past or it may be vulnerable to collective dismissal due to poor financial conditions or technical reasons.	Discrimination			
We do not verify the age of workers at the time of hiring.	Child Labor			

**LABOR RISK AND IMPACT ASSESSMENT**

<b>RISK FACTOR</b>	<b>LABOR PERFORMANCE ELEMENT</b>	<b>LIKELIHOOD OF THE RISK FACTOR (ALMOST CERTAIN, LIKELY, POSSIBLE, UNLIKELY, RARE)</b>	<b>IMPACT OF THE RISK FACTOR (SEVERE, MAJOR, MODERATE, MINOR, INSIGNIFICANT)</b>	<b>SEVERITY (MAJOR, MODERATE, MINOR)</b>
Workers are required to deposit money or their original documents (e.g. certificates, landing documents, passports, etc.) as a condition of their employment.	Forced Labor			
	Discrimination			
We withhold one-month salary from workers as security deposit.	Forced Labor			
Our workers don't have access to separate and clean areas for changing clothes.	Health and Safety			
Sanitation and washing facilities are rarely or never inspected.	Health and Safety			
Our production activities include significant lifting, carrying or repetitive motions.	Health and Safety			
Large equipment is used in our operations.	Health and Safety			
Equipment, machinery and tools are not rarely or never inspected or maintained.	Health and Safety			
Our production activities involve workers routinely interacting with machinery.	Health and Safety			
There are dust emissions/high noise levels due to certain activities.	Health and Safety			
Our workers work long hours in areas with exposure to sunlight, ultraviolet radiation and/or excessive heat.	Health and Safety			
Workers are required to work at precarious levels and high elevations.	Health and Safety			
Workers have to bring their own water because we do not provide access to potable water.	Health and Safety			
When accidents happen at the workplace we do not record them in writing.	Health and Safety			
The organization has done a collective dismissal in the past or it may be vulnerable to collective dismissal due to poor financial conditions or technical reasons.	Discrimination			
We do not verify the age of workers at the time of hiring.	Child Labor			
Workers do not receive medical exams.	Health and Safety			
First aid boxes are located far from the worksite.	Health and Safety			
We do not have first aid boxes.	Health and Safety			

**LABOR RISK AND IMPACT ASSESSMENT**

<b>RISK FACTOR</b>	<b>LABOR PERFORMANCE ELEMENT</b>	<b>LIKELIHOOD OF THE RISK FACTOR (ALMOST CERTAIN, LIKELY, POSSIBLE, UNLIKELY, RARE)</b>	<b>IMPACT OF THE RISK FACTOR (SEVERE, MAJOR, MODERATE, MINOR, INSIGNIFICANT)</b>	<b>SEVERITY (MAJOR, MODERATE, MINOR)</b>
Some or all of the supplies in our first aid boxes have expired.	Health and Safety			
We do not have a fire extinguisher.	Health and Safety			
We do not have procedures in place in case of a workplace emergency.	Health and Safety			
Workers are not aware of what to do in case of a workplace emergency.	Health and Safety			
Chemicals are handled by anyone, regardless of training.	Health and Safety			
Our tools are not well maintained or ill designed for the job.	Health and Safety			
Roadways and paths are narrow, restricting vehicular or personnel movements.	Health and Safety			
Electrical equipment used is not regularly inspected and maintained.	Health and Safety			
Confined spaces are not yet identified and workers are not fully trained on safe operating practices.	Health and Safety			
We use open trucks to transport workers from location to another.	Health and Safety			
Our production activities involve hazardous materials or processes that could cause fires or explosions.	Health and Safety			
Some or all hazardous materials are not identified or labeled.	Health and Safety			
Some or all of the workers are not trained in safe handling of chemicals or other hazardous substances.	Health and Safety			
We have not identified all operations where personal protective equipment (PPEs) is required.	Health and Safety			
Not all workers who use PPE are trained on how to use it	Health and Safety			
There is a lack of appropriate signage around the workplace related to emergency procedures.	Health and Safety			
We do not have drills in place in case of an emergency.	Health and Safety			
We do have emergency drills, but our workers are not aware of them.	Health and Safety			



**LABOR RISK AND IMPACT ASSESSMENT**

RISK FACTOR	LABOR PERFORMANCE ELEMENT	LIKELIHOOD OF THE RISK FACTOR (ALMOST CERTAIN, LIKELY, POSSIBLE, UNLIKELY, RARE)	IMPACT OF THE RISK FACTOR (SEVERE, MAJOR, MODERATE, MINOR, INSIGNIFICANT)	SEVERITY (MAJOR, MODERATE, MINOR)
The companies in our supply chain would probably answer “Yes” to most of the questions above.	Health and Safety			
Workers do not receive payslips that clearly indicate all deductions made.	Forced Labor			
	Wages and Benefits			
	Regular Employment			
<b>COMMUNITY, HEALTH, AND SAFETY</b>				
Our operations involve air emissions, water discharge, solid waste disposal, leakage of chemicals or gases, etc, that may pass on to the surrounding community				
We use certain banned or restricted chemicals, pesticides or herbicides in our operations.				
We plan to decommission and dispose of old infrastructure, buildings, equipment and other facilities.				
There is significant movement of vehicles in and around the communities near our facilities due to our operations.				
We store hazardous chemicals or hazardous waste in our facility.				
We discharge untreated water from our operations.				
Few or none of our workers are from the surrounding communities.				
We sometimes have complaints from the local community.				
Our operations use large quantities of fresh water.				
Our operations involve a high risk of fires and explosions. Our building is not fit or does not have a permit for the operations taking place.				
Our building is not fit or does not have a permit for the operations taking place.				







*Photography: Palma Futuro Project, funded 100% by the United States Department of Labor*



# 3

## INTRODUCTION TO DEVELOPING CODE, POLICY AND COMMITMENTS

A code, or set of policies is the foundation of your Social Compliance System (SCS). Once you have assigned people within your farm to manage your Social Compliance System and assessed your farm's risks, you can develop policies to manage all aspects of your labor performance – with a focus on your risk areas. You will also need to develop procedures, which act as the “how-to” for implementing your policies. If you already have policies and/or procedures, use this chapter to check whether they adequately cover all applicable topics and then adapt accordingly.

To do so, this chapter includes 2 tools:

**3.1 TOOL FOR DEVELOPING LABOR POLICIES:** A guide to creating your farm's labor policies. It covers all nine labor performance elements included in the SCS framework.

**3.2 TOOL FOR DEVELOPING PROCEDURES:** This tool helps you develop the step-by-step instructions implementing the policies created in the previous tool.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.3.*





# 3.1 TOOL FOR DEVELOPING LABOR POLICIES

## INTRODUCTION

Policies are the foundation of successfully implementing a Social Compliance System (SCS).

Simply put, the policies are the rules. They summarize your farm's commitment to managing labor risks and impacts and establish the expectations for conduct, by telling your workers and all external stakeholders what you do and do not allow when it comes to labor conditions. **Labor policies**, which this tool helps you develop, are the rules and expectations for your farm's working conditions.

## INSTRUCTIONS

Follow the steps below to create your labor policies.

### STEP 1.

Be sure to have Chapter 3 (Labor Elements) of the Palma Futuro Handbook handy as you work through this tool. As a reminder, the nine labor performance elements are:

1. Child Labor
2. Forced Labor
3. Occupational Health and Safety
4. Freedom of Association
5. Discrimination
6. Disciplinary Practices
7. Working Hours
8. Wages and Benefits
9. Regular Employment

Tool



**WHAT:** A guide to developing or refining labor policies.

**HOW:** Use in conjunction with Chapter 4 (Section 4.3) of the Palma Futuro handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**SCS CATEGORY:** Developing Code, Policy and Commitments



## STEP 2.

Start with Child Labor. Read the applicable sub-section in the handbook (3.1), paying particular attention to the “Key Considerations” section. Then, review the policy statement example for Child Labor in the table below.

### ANNEX 3.1

LABOR ELEMENT		POLICY STATEMENT
1	Child Labor	We are committed to not hiring children under the legal minimum age.
2	Forced Labor	We will ensure all workers enjoy the freedom to move around the workplace, and in and out of the workplace, as they please, and that all workers are aware of their true working conditions and job expectations prior to starting.
3	Occupational Health and Safety	We are committed to creating a clean, safe working environment.
4	Freedom of Association	All workers are allowed to join or form unions in accordance with the law, and will not be treated differently if they do.
5	Discrimination	All workers will be treated equally and enjoy the same opportunities regardless of their gender, migrant status, or sexual orientation.
6	Disciplinary Practices	Discipline is not arbitrary and only employed if violations that were specified as such occur. When it is employed, there is no corporal or physical punishment nor is there the threat of such.
7	Working Hours	Workers will not be required to work more than the legal limit. If they do, they will be compensated for overtime.
8	Wages and Benefits	We are committed to paying all workers in a timely, consistent manner, and providing them with the benefits they are entitled to by law.
9	Regular Employment	All workers will have written contracts that describe the terms of their employment.

## STEP 3.

In **Annex 3.2** below, write your own policy statement to summarize how your farm will uphold the standards described in the Child Labor section. This is a freestyle policy statement that represents your farm’s commitments, beliefs and principles, which gives you the opportunity to use your imagination and creativity. You could base it off the policy statement above or any of the ideas below. You may also include more than one statement per labor element.



1. Describe the set of labor requirements that your farm is committed to meeting. For example: “We are committed to not hiring children under the legal minimum age.”
2. Reflect on the specific labor risks in the palm oil industry that the handbook describes, or based on the findings from your Risk Assessment (Tool 2.1). For example: “We are committed to ensuring children are not found in any part of the workplace, even on the weekends and holidays.”
3. Establish expectations for how personnel should act in order to implement your commitments. For example: “We do not tolerate any worker bringing a child to the workplace.”

**STEP 4.**

Write your policy statement for Child Labor in the table below. Repeat the process for all eight remaining labor elements.

**ANNEX 3.2**

LABOR ELEMENT		POLICY STATEMENT
1	Child Labor	
2	Forced Labor	
3	Occupational Health and Safety	
4	Freedom of Association	
5	Discrimination	
6	Disciplinary Practices	
7	Working Hours	
8	Wages and Benefits	
9	Regular Employment	





## 3.2 TOOL FOR DEVELOPING PROCEDURES

### INTRODUCTION

Once you have developed or refined your labor policies using tool 3.1, the next step is to develop a plan for how to ensure these policies are followed. This is where procedures come in: procedures are step-by-step instructions for workers, supervisors, and owners apply your farm's policies. They should align with your policies consistently, define how to adhere to them, and explain the consequences for violating them.

### INSTRUCTIONS

**STEP 1.** Take out your farm's labor policies, which you developed in the previous exercise (3.1). Write them in the "Policy" column for their corresponding labor element table in **Annex 3.4** below.

**STEP 2** Starting with your Child Labor policy, brainstorm what actions need to be carried out to ensure that policy is followed. These actions, which are your procedures, should define how to adhere to a policy and explain the consequences for violating them. For each policy statement, consider at what point in the employment life-cycle the procedure would need to occur: the moment a worker is hired, during their time working at the farm, and/or at their employment termination.

**STEP 3** Write down the procedure and the employment stage for each of your policies in **Annex 3.4** below. Refer to **Annex 3.3** for examples.

The final list represents the procedures for each of your farm's labor policies.

**STEP 4** Repeat Steps 2 and 3 for all eight remaining labor element policies.

### Tool



**WHAT:** A guide to developing procedures to help implement policies.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.3) of the Palma Futuro Handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**SCS CATEGORY:** Developing Code, Policy and Commitments

### ANNEX 3.3: EXAMPLE PROCEDURES FOR LABOR POLICIES

LABOR ELEMENT	POLICY	ACTION(S) NEEDED	EMPLOYMENT STAGE AT WHICH IT SHOULD BE CARRIED OUT
Child Labor	We do not hire underage workers.	Check age verification documents of all prospective workers	Recruitment or hiring
Forced Labor	We will ensure all workers enjoy the freedom to move around the workplace, and in and out of the workplace, as they please, and that all workers are aware of their true working conditions and job expectations prior to starting.	Ensure doors are left open all day and night, especially in the dormitories.  Monitor all third party contractors to ensure they are providing prospective workers with accurate information.	Recruitment, Employment
Occupational Health and Safety	We are committed to creating a clean, safe working environment.	Regularly clean and update equipment.  Train all workers on how to use the proper equipment	Employment
Freedom of Association	All workers are allowed to join or form unions in accordance with the law, and will not be treated differently if they do.	Make workers aware of their rights to freely associate.  Ensure all worker representatives and union employees receive the same wages and benefits as non-union employees.	Employment, Termination
Discrimination	All workers will be treated equally and enjoy the same opportunities regardless of their gender, migrant status, or sexual orientation.	Train all employees on their rights.  Develop guidelines for promotions and bonuses based on merit.	Employment
Disciplinary Practices	Discipline is not arbitrary and only employed if violations that were specified as such occur. When it is employed, there is no corporal or physical punishment nor is there the threat of such.	Develop a list of actions that are in violation and could be grounds for termination.  Train all managers on importance of not wielding or employing threats.	Employment, termination
Working Hours	Workers will not be required to work more than the legal limit. If they do, they will be compensated for overtime.	Develop a system to track and manage each workers' hours.  Ensure overtime is compensated per national legislation.	
Wages and Benefits	We are committed to paying all workers in a timely, consistent manner, and providing them with the benefits they are entitled to by law.	Develop a system for tracking payments to each worker.	
Regular Employment	All workers will have written contracts that describe the terms of their employment.	Develop written employment contracts for every worker, to be reviewed and agreed to prior to starting work.  Provide each worker a copy of their contract	Recruitment and hiring



**ANNEX 3.4: PROCEDURES FOR LABOR POLICIES**

LABOR ELEMENT	POLICY	ACTION(S) NEEDED	EMPLOYMENT STAGE AT WHICH IT SHOULD BE CARRIED OUT
Child Labor			
Forced Labor			
Occupational Health and Safety			
Freedom of Association			
Discrimination			
Disciplinary Practices			
Working Hours			
Wages and Benefits			
Regular Employment			





## CHAPTER 3A: TEMPLATES

Palma Futuro has created a handful of templates to help you implement various labor policies. This is not an exhaustive list of the documents your farm will need to develop for your SCS policies, but it is a good start.

There are 3 Templates:

### **3A.1 REGISTRY OF HOURS WORKED**

The Working Hours Log is a template that can help you monitor and manage the working hours of your employees.

*To be used alongside Palma Futuro Handbook Chapter 3.7 (Working Hours)*

### **3A.2 REGISTRY OF FOOD PROVIDED**

The Registry of Food Provided can help you monitor and manage workers' daily food consumption.

*To be used alongside Palma Futuro Handbook Chapter 3.8 (Wages and Benefits)*

### **3A.3 HEALTH AND SAFETY CHECKLIST**

The Health and Safety monitoring checklist can be used as a complement to reinforce overall monitoring of health and safety measures, included as a part of the Social Compliance System Monitoring Tool (Tool 6.1).

*To be used alongside Palma Futuro Handbook Chapter 3.3 (Health and Safety)*







# TEMPLATE 3A.1 WORKING HOURS LOG

## INTRODUCTION

The Working Hours Log is a template that can help you monitor and manage the working hours of your employees, so that you can ensure compliance with working hour regulations and respect the worker's rights to minimum weekly rest as enshrined in national law and international standards. It is a source of verification that also serves to promote transparency of working hours for workers.

## INSTRUCTIONS

1. First, upon arrival at the farm or plantation, each worker must update their record from the morning, fill out the record with the date, their identity number (if relevant), their name, and the time of entry. Make sure to include the time spent preparing for work, including time spent changing clothes. Also consider that workers entering and exiting and recording time will take time and workers should be paid for this wait time.
2. When leaving work at the end of the day, each worker must update their record from the morning, filling in the time of departure in the same row. Once completed, the worker signs it.
3. The most important thing is that the workers fill it out themselves. It cannot be done by someone else in the company or farm. It is the responsibility of the supervisors to ensure that each worker fills it out and to check for inaccuracies/errors.







# TEMPLATE 3A.02

## REGISTRY OF FOOD PROVIDED

### INTRODUCTION

The Registry of Food Provided is a template that can help you monitor and manage the daily food consumption of each worker for those companies, farms, and/or plantations that are required to provide food to their employees. It is a source of verification that can ensure compliance with daily food regulations and thus respect the rights of workers to food as enshrined in national and international legislation, while serving to promote transparency of food consumed for workers.

### INSTRUCTIONS

1. First of all, after the first meal -breakfast- each worker must fill in the log with the date, his/her name, and a “check” or “x” in the breakfast box to verify that they received it.
2. For both lunch and dinner, that same worker must fill in the same row, with a “check” or “x”, as if they received each of these meals. Once completed, the worker signs it.
3. After dinner, the worker also indicates the total value of the food consumed on that day, before signing it.
4. The most important thing is that each worker fill it out for themselves. It cannot be filled out by someone else in the company or farm. It is the responsibility of the supervisors to ensure that each worker fills it out and to check for inaccuracies/errors.
5. Keep a log of the contents of each meal to track that it fulfills caloric and nutritional requirements in the columns under “Description of Meals”.









# TEMPLATE 3A.03

## HEALTH AND SAFETY MONITORING CHECKLIST

### INTRODUCTION

The Health and Safety monitoring checklist can be used to complement and reinforce the overall monitoring of health and safety measures in conjunction with the Social Compliance System Monitoring Tool (Tool 6.1). While the two tools overlap, it is important to thoroughly monitor health and safety because of the potential for severe impacts on workers lives.

### INSTRUCTIONS

1. Ensure that the health and safety review is conducted by a qualified member of either a social compliance team, a sustainability team, or human resources.
2. As that person reviews the various work areas, check off the degree of compliance. Include any notes in the observation box.
3. For all the questions that your organization either partially complies with or does not comply with, write the recommendation for how to fix it, the person or department responsible for fixing it, and the proposed deadline by which the issue should be fixed.
4. Once completed, you can translate this information over to the Corrective Action improvement plan, included as tool 7.3.



## OCCUPATIONAL HEALTH AND SAFETY MONITORING

PLANTATION NAME		DATE THE REVIEW WAS PERFORMED				
NAME OF EXTRACTION PLANT WITH WHOM YOU HAVE A COMMERCIAL RELATIONSHIP		NAME OF THE PERSON WHO PERFORMED THE REVIEW				
OCCUPATIONAL HEALTH AND SAFETY MONITORING LIST		COMPLIANCE(CHOOSE ONE)	OBSERVATIONS (PARTIAL EXPLAIN)	RECOMMENDATION	RESPONSIBLE	DEADLINE FOR CORRECTIVE ACTION
<b>MANAGEMENT</b>	1. The licenses and permits necessary to legally operate the farm in accordance with health and safety laws are in place and are up to date.	YES/NO/PARTIAL/DOES NOT APPLY				
	2. The farm has an updated health and safety risk assessment.	YES/NO/PARTIAL/DOES NOT APPLY				
	3. Periodic Occupational Health and Safety training is held for all farm workers (during initial onboarding, regular training, PPE, special OHS conditions such as chemicals, emergency procedures, among others).	YES/NO/PARTIAL/DOES NOT APPLY				
	4. There is a qualified person on the farm responsible for Occupational Health and Safety (whatever legally applies).	YES/NO/PARTIAL/DOES NOT APPLY				
	5. There is a health and safety committee or its equivalent (where required by law). Review minutes.	YES/NO/PARTIAL/DOES NOT APPLY				
	6. All machines and tools have the necessary safety devices and guards, including field tools (for example: blade and saw guards, pulley covers, emergency stop buttons, etc.). Check last record.	YES/NO/PARTIAL/DOES NOT APPLY				
	7. Records are kept of inspections and repairs of machinery, equipment and wiring, including tools and equipment used in the field. Check last record.	YES/NO/PARTIAL/DOES NOT APPLY				
	8. Work areas, buildings and the field are maintained to prevent hazards (examples: slipping and tripping). Check last record.	YES/NO/PARTIAL/DOES NOT APPLY				
	9. The buildings, administrative areas, or work zones where the work is performed are structurally sound (for example, no structural cracks in ceilings and walls). Check last record.	YES/NO/PARTIAL/DOES NOT APPLY				
	10. There is adequate electrical wiring (examples: not damaged/exposed or loose, potential for electrical shock and/or tripping hazard, no extension cords used in lieu of wall outlets), in all facilities.	YES/NO/PARTIAL/DOES NOT APPLY				
<b>MAINTENANCE</b>						





## OCCUPATIONAL HEALTH AND SAFETY MONITORING

PLANTATION NAME	DATE THE REVIEW WAS PERFORMED				
NAME OF EXTRACTION PLANT WITH WHOM YOU HAVE A COMMERCIAL RELATIONSHIP	NAME OF THE PERSON WHO PERFORMED THE REVIEW				
OCCUPATIONAL HEALTH AND SAFETY MONITORING LIST	COMPLIANCE(CHOOSE ONE)	OBSERVATIONS	RECOMMENDATION	RESPONSIBLE	DEADLINE FOR CORRECTIVE ACTION
<b>BATHROOM AND AREAS WHERE FOOD IS TAKEN</b>	11. There is unlimited and free access to restrooms, both on the premises and in the field.	YES/NO/PARTIAL/DOES NOT APPLY			
	12. There are restrooms both in the facilities and on the field, they are separate and private.	YES/NO/PARTIAL/DOES NOT APPLY			
	13. Restrooms, both in the facilities and in the field, are regularly cleaned, have good ventilation and lighting, as well as water and supplies (toilet paper, soap, towels). Check last record.	YES/NO/PARTIAL/DOES NOT APPLY			
	14. The food preparation/dining area in the facilities is separate from the work areas, has hygienic conditions and are suitable for all workers.	YES/NO/PARTIAL/DOES NOT APPLY			
	15. There is free and unlimited access to drinking water for all (water potability study), both at the facilities and in the field.	YES/NO/PARTIAL/DOES NOT APPLY			
<b>PERSONAL PROTECTIVE EQUIPMENT</b>	16. Workers use the Personal Protection Equipment (PPE) assigned according to the OHS risk assessment.	YES/NO/PARTIAL/DOES NOT APPLY			
	17. The Personal Protection Equipment, and its replacement is free for all workers. Review delivery tickets.	YES/NO/PARTIAL/DOES NOT APPLY			
<b>FIRST AID AND MEDICAL CARE</b>	18. There are first aid personnel identified with a visible badge, trained and qualified both in the facilities and in the field, and medical follow-up is provided in case of emergencies.	YES/NO/PARTIAL/DOES NOT APPLY			
	19. First aid kits are accessible, visible, and adequately stocked with non-expired products and materials both in the facilities and in the field. Visible emergency telephone numbers.	YES/NO/PARTIAL/DOES NOT APPLY			
	20. There are up-to-date medical records of facility and field workers (example: cholinesterase test), who need it according to their activities and comply with the requirements of the law.	YES/NO/PARTIAL/DOES NOT APPLY			
	21. There are periodic controls for Incidents/Accidents and adequate legal documentation, both for facility workers and for the field.	YES/NO/PARTIAL/DOES NOT APPLY			

# OCCUPATIONAL HEALTH AND SAFETY MONITORING

PLANTATION NAME		DATE THE REVIEW WAS PERFORMED				
NAME OF EXTRACTION PLANT WITH WHOM YOU HAVE A COMMERCIAL RELATIONSHIP		NAME OF THE PERSON WHO PERFORMED THE REVIEW				
OCCUPATIONAL HEALTH AND SAFETY MONITORING LIST		COMPLIANCE(CHOOSE ONE)	OBSERVATIONS	RECOMMENDATION	RESPONSIBLE	DEADLINE FOR CORRECTIVE ACTION
<b>HANDLING AND STORAGE OF CHEMICALS AND HAZARDOUS MATERIAL</b>	22. There are adequate procedures that meet the requirements for the safe storage of chemicals and hazardous materials.	YES/NO/PARTIAL/DOES NOT APPLY				
	23. All chemical and hazardous, combustible or flammable or other materials are properly labeled.	YES/NO/PARTIAL/DOES NOT APPLY				
	24. All chemical and dangerous, combustible or flammable products are separated from the production areas, in areas designated with their material safety data sheet (MSDS) where these products are handled.	YES/NO/PARTIAL/DOES NOT APPLY				
	25. Chemicals are stored taking into account their chemical activity.	YES/NO/PARTIAL/DOES NOT APPLY				
	26. All chemical and hazardous, combustible or flammable materials are kept away from emergency exits.	YES/NO/PARTIAL/DOES NOT APPLY				
	27. In the facilities and in the field, there is an adequate and well-maintained fire-fighting system. Review the inspection record.	YES/NO/PARTIAL/DOES NOT APPLY				
<b>FIRE SYSTEM AND EMERGENCY PREPAREDNESS</b>	28. There are alarms for emergencies both in the facilities and in the field. Alarms are free of obstructions and are marked with clear and visible signage that is understood by workers	YES/NO/PARTIAL/DOES NOT APPLY				
	29. The location, signage of the fire extinguishers and the route to reach them is visibly marked in the facilities. There are mobile fire extinguishers in the field.	YES/NO/PARTIAL/DOES NOT APPLY				
	30. The exits, evacuation routes and emergency signage in the facilities and field are adequate and visible.	YES/NO/PARTIAL/DOES NOT APPLY				
	31. Emergency exits in the facilities (doors and windows) are identified with visible signage, are not obstructed, locked or blocked and have an alternate source of lighting and power, for example batteries.	YES/NO/PARTIAL/DOES NOT APPLY				
	32. Clearly demarcated "you are here" evacuation plans are in place both at the facility and in the field.	YES/NO/PARTIAL/DOES NOT APPLY				
	33. Documented and periodic drills were carried out for all workers in the facilities, field and all work shifts. Review records.	YES/NO/PARTIAL/DOES NOT APPLY				
<b>HOUSING</b>	34. Meeting points are visible and in good condition, both for the facilities and in the field.	YES/NO/PARTIAL/DOES NOT APPLY				
	35. The houses on the farm meet the basic requirements of the law (distance from production areas, water, showers, toilets, lighting, ventilation, kitchen, cleaning, beds or hammocks, adequate sewage collection). Applies to all homes located on the farms. Explain details.	YES/NO/PARTIAL/DOES NOT APPLY				
<b>GENERAL OBSERVATIONS</b>	36. The farm has houses on its premises and meets the minimum health and safety requirements of the law (electrical system, security signage, emergency exits or doors with alternative lighting, meeting points, fire extinguishers, drills, emergency alarms in case it is necessary, first aid kits). Explain details.	YES/NO/PARTIAL/DOES NOT APPLY				





*Photography: Palma Futuro Project, funded 100% by the United States Department of Labor*



# 4

## INTRODUCTION TO ENGAGING STAKEHOLDERS AND PARTNERS

Involving the right stakeholders can improve your internal farm operations. Early and regular communication with stakeholders provides important input for your risk assessment, policies, procedures, monitoring, and other SCS activities.

A comprehensive stakeholder engagement plan follows four consecutive steps: stakeholder identification, stakeholder mapping, initial stakeholder engagement, and ongoing stakeholder engagement.

To that end, this chapter includes the following tool:

### **4.1 STAKEHOLDER TOOL**

A step-by-step guide to identifying, mapping, and engaging stakeholders.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.4.*



## Tool



**WHAT:** Step-by-step guidance for developing a comprehensive stakeholder engagement plan

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.4) of the Palma Futuro handbook

**WHO:** Management and social compliance designee(s) at small palm oil farms

**SCS CATEGORY:** Engaging Stakeholders and Partners

## Note

Remember, your farm's neighbors and surrounding community are an important stakeholder that require unique, consistent engagement. When identifying stakeholders, consider specific people as well as community leaders that are affected by your operations due to their proximity to your farm - be it from trucks driving through their neighborhood, pesticide use, water run-off, or other impacts.

# 4.1 STAKEHOLDER TOOL

## INTRODUCTION

### What is a stakeholder?

**Stakeholders** are individuals and groups that have an interest in or are affected by your farm. They include workers and their families, investors, suppliers/vendors, neighbors, nearby schools, local civil society organizations, government bodies, industry associations, academics, other experts, and more. All of these people and organizations have a stake in your farm's financial, environmental, and social performance.

### Why engage stakeholders?

Involving the right stakeholders can improve your internal farm operations. Early and regular communication with stakeholders provides important input for your risk assessment, your policies and procedures, and all other SCS activities. The relationship between your stakeholders and your farm should be mutually beneficial: while they provide you with **positive** expertise on how to improve a given risk area, they also provide feedback on how your operations **negatively** impact them, which you can then address.

A comprehensive stakeholder engagement plan follows four consecutive steps: stakeholder identification, stakeholder mapping, initial stakeholder engagement, and ongoing stakeholder engagement.

## INSTRUCTIONS

### STEP 1. Identify the relevant, interested stakeholders.

As a group or on your own, brainstorm people, organizations, groups, and communities who are affected by and/or connected to your farms, operations using the questions below. Write your answer in the space provided. Be as specific as possible - use names where you can.

To whom does the organization have legal obligations?

Who might be positively or negatively affected by the farm's decisions or activities?

Who is likely to express concerns about the decisions and activities of the farm?

Who has been involved in the past when similar issues needed to be fixed?

Who can help the farm address specific issues?

Who can affect the farm's ability to meet its responsibilities?

Who would be disadvantaged if excluded from the stakeholder engagement?





**STEP 2. Write the stakeholders you identified in Step 1 in the table below. This is your *List of Identified Stakeholders*.**

For each, you will also identify the type of stakeholder. Some types of stakeholders include:

- **Non Governmental Organizations (NGOs) and Civil Society organizations (CSOs):** Groups that advocate for a cause and/or provide services that are not profit seeking and not government entities. For example UNICEF is a type of NGO/CSO.
- **Unions**
- **Governmental institutions**
- **Clients**
- **Communities or Neighbors**
- **Workers**
- **Owners**

N°	STAKEHOLDER NAME	TYPE OF STAKEHOLDER	STAKEHOLDER POINT OF CONTACT (IF KNOWN)
1	<i>Neighboring school next to the farm</i>	<i>Communities or Neighbors</i>	<i>School leader</i>
2			
3			
4			
5			
6			

*Note*

Remember to consider the risks that impact your neighbors and surrounding communities. For example, if you identified fault equipment as a risk, and one piece of that equipment is your transport truck, that could impact your neighbors as the truck drives by them every day.

**STEP 3. Link your farm’s risks to the stakeholders related to each risk in the table below**

As identified in the Risk Assessment you carried out using the tool in Chapter 2 (Assessing Risks and Impacts), list the “Severe” risks in the first column and the Labor Performance Elements each severe risk is connected to (see the Labor Performance Elements column on the Risk Assessment). Then, connect each risk to a stakeholder or multiple stakeholders from the previous table that has either expertise or is affected by that risk. Finally, describe your farm’s existing relationship with that stakeholder: is it existent or nonexistent? Close or distant? Formal or informal? Positive or negative? You can choose how to categorize the relationship.



SEVERE RISKS	RELEVANT LABOR PERFORMANCE ELEMENTS	STAKEHOLDER	EXISTING RELATIONSHIP WITH YOUR FARM
<i>There are children close to the work stations but no signage telling them where they can and cannot go.</i>	<i>Child labor</i>	<i>Neighboring school next to the farm</i>	<i>Close</i>

**STEP 4. “Map” your stakeholders in the table below**

Now, for each stakeholder listed above, determine their (1) importance, (2) interest in engaging, (3) capacity to participate, and (4) level of influence. This process, called “stakeholder mapping”, allows you to prioritize which stakeholders to engage.

Write all the stakeholders from the table above in the stakeholder map table below. Then, choose the answer that best describes the stakeholder for the following three categories, and write them in the table below. Where you don’t have all the necessary information, just fill out the table to the best of your ability. For example you may not know the stakeholder’s capacity to participate and that is fine, you do not necessarily need to include it if you don’t know

(1) Level of importance (high or low)

- High Importance: The stakeholder’s impact on my work activities is significant.
- Low Importance: The stakeholder’s impact on my work activities is minimal, either positive or negative.

(2) Interest in engaging (high or low)

- High Interest in Engaging: The stakeholder is very interested in working with us.
- Low Interest in Engaging: The stakeholder is not interested in working with us.



## Note

Communities and neighbors should always be considered important stakeholders, despite being potentially difficult to engage because they may not have an organized representative body like an NGO does, for example. Your farm needs to make an additional effort to gather their feedback and address any potential negative impacts accordingly. One way to overcome this hurdle with communities is to ensure they have an accessible, anonymous way to provide your farm with feedback. Use the tool in the next chapter, 5.4 Grievance Mechanism Tool, to do so.

### (3) Capacity to participate (high or low)

- High Capacity to Participate: The stakeholder has enough resources and personnel to engage our farm.
- Low Capacity to Participate: The stakeholder does not have enough resources to engage our farm.

### (4) Level of influence (high or low)

- High Level of Influence: The stakeholder has control over key decisions, implementation, and can cause others to take action.
- Low Level of Influence: The stakeholder does not have control over key decisions, implementation, and cannot cause others to take action.

Finally, in the last column determine who amongst your team will be the point-person for engaging each stakeholder. If you are the only one, write yourself.

Stakeholder	Importance	Interest in Engaging	Capacity to Participate	Level of Influence	Person Responsible for Engaging
Neighboring school next to the farm	High	High	Low	Low	



**STEP 5. Group your stakeholders by influence and interest in the table below**

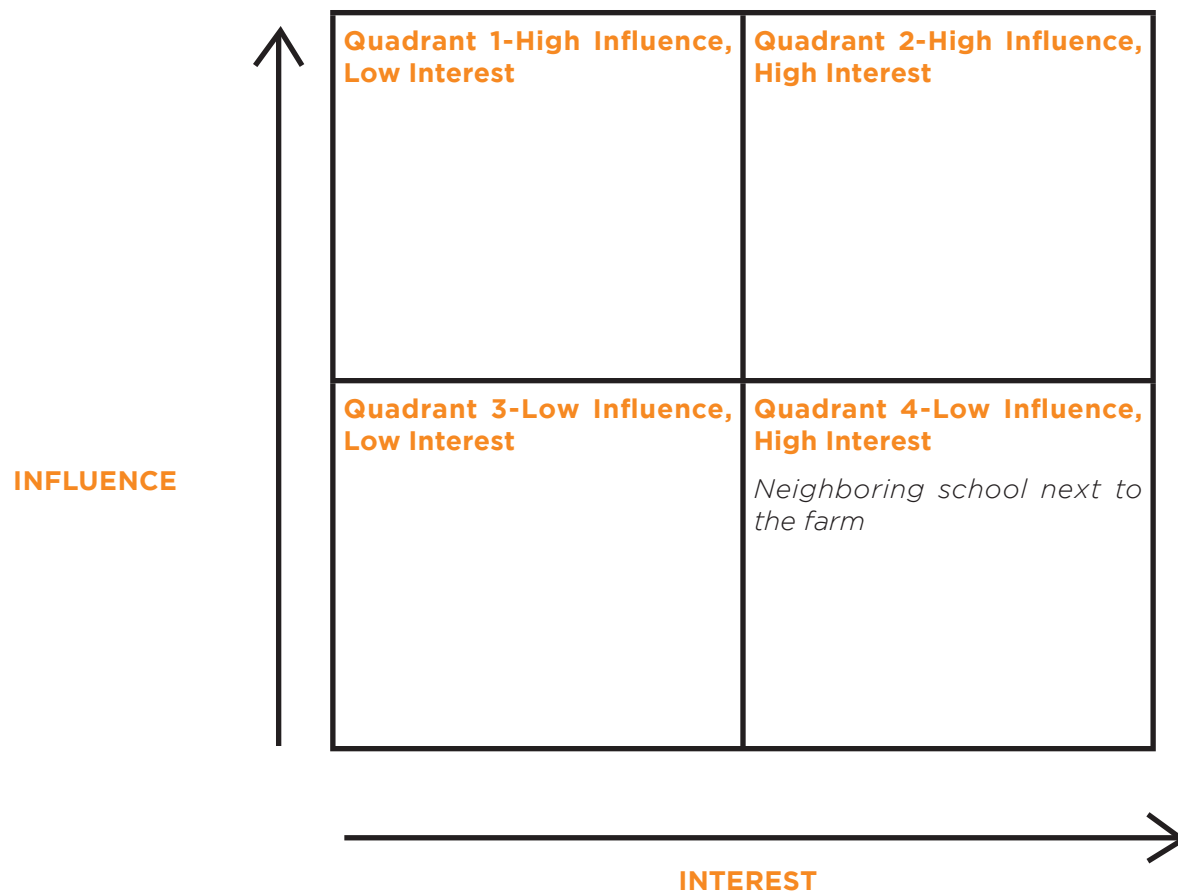
In the table below, write the name of each stakeholder from above in the relevant quadrant based on their level of influence and interest in engaging. The following describes each quadrant, and how to engage these stakeholders in each quadrant:

**Quadrant 1, High Influence, Low Interest:** Stakeholders should be involved as needed

**Quadrant 2, High Influence, High Interest:** Stakeholders must be actively approached and supported

**Quadrant 3, Low Influence, Low Interest:** Stakeholders must be kept informed

**Quadrant 4, Low Influence, High Interest:** Farm must respond to requests/concerns from Stakeholders



**STEP 6. Create a stakeholder engagement plan in the table below**

In the table below, re-write all stakeholders listed in each of the 4 quadrants above. Re-write the risk they are associated with. Refer to your Labor Risk and Impact Assessment (Tool 2.2). Then, determine the initial outreach strategy and the long-term outreach strategy. This should be based on the quadrant they are in above. For example, if they are in Quadrant 2, the initial strategy could be “call the group by the end of this week and ask for a meeting.”

Stakeholder	Risk Area	Identified risk	Initial Outreach Strategy	Follow up outreach strategy	Date	Person Responsible
<i>Neighboring school next to the farm</i>	<i>Child Labor</i>	<i>Children walking through farm on way to/ from school</i>	<i>Reach out to school leader</i>	<i>Invite them to a meeting with farm management.</i>	<i>January 1 2022</i>	





**RESPONSABILIDAD SOCIAL**



**RESPONSABILIDAD AMBIENTAL**



Documentos de información y procedimientos de emergencia.

### TELÉFONOS DE EMERGENCIA

EMERGENCIAS MÉDICAS		
ENTIDAD	DIRECCION	TELÉFONOS
LÍNEA ATENCIÓN EMERGENCIAS	NA	112
CRUZ ROJA	NA	152
MIL SUVA	NA	3100281144 619611794
HOSPITAL LAZARO ALFONSO	SAN ALBERTO CALLE 245-42	3940000 3940001
HOSPITAL ALVARO FARIAS	SAN MARTIN CALLE 8 NO. 20-01	3940000 3940001
HOSPITAL JOSE DAVID PADILLA	LAGACHEA CALLE 8 NO. 41	3917804

EMERGENCIAS DE ORDEN PÚBLICO		
ENTIDAD	TELÉFONOS	
POLICIA SAN ALBERTO	31120000 3940000 3940001	
POLICIA SAN MARTIN	31120000 3940000 3940001	
GUARDA ELERERTO	3940000	

EMERGENCIAS NATURALES (INCENDIOS, FURACANES)		
ENTIDAD	TELÉFONOS	
BOMBEROS SAN ALBERTO	31120000 3940000 3940001	
BOMBEROS SAN MARTIN	31120000 3940000 3940001	
BOMBEROS PALMACHA	3940000 3940001 3940002	
DEFENSA CIVIL SAN MARTIN	31120000	

NOTA: Agregue este listado de emergencias a su libro de contactos del celular. Imprima los teléfonos de sus teléfonos móviles.

### GUIA ENTREGA DE RESIDUOS PELIGROSOS

Guía para la entrega de Residuos Peligrosos a Palmas del Cesar S.A

1. Horario de entrega: Lunes a Viernes de 8am a 10am
2. Nombre del lugar: Palmas del Cesar S.A - Miras en la Manera Principal en frente de la planta de aterrizaje
3. Se reciben los residuos en las siguientes condiciones:
  - Las botellas y envases totalmente vacíos
  - Los envases o botellas deben venir limpios con el triple lavado
  - Si tienen facilidad para traer los envases y canecas perforados esta bien, de lo contrario los entregamos con el triple lavado.
4. Siempre para la entrega de residuos peligrosos, deben relacionarlos en el formato denominado "ENTREGA DE REGISTROS PELIGROSOS PROVEEDORES", que se envía anexo a este instructivo.
5. Que recibe Palmas del Cesar S.A, denominado como residuo peligroso: Insumos de productos agroquímicos (Insecticidas, Bactericidas, Fungicidas, Herbicidas), botellas o envases de fertilizantes.

Cualquier inquietud se pueden comunicar con Nancy Aparicio 314 35 30 633 o Viviana Dueñas 316 030 2859



# 5 INTRODUCTION TO COMMUNICATING, TRAINING AND GRIEVANCE MECHANISMS

Every employee has a role to play in implementing the SCS. Workers and managers should all understand your farm's commitment to decent labor conditions. This requires clear communication and ongoing, progressive trainings. In turn, to be effective at identifying risks and impacts, improving procedures, designing improvement plans, monitoring impacts and outcomes, and all other SCS functions, you need input from workers and managers. This is where a clear grievance mechanism is useful. This chapter includes 4 tools to prepare you to communicate, train, and solicit feedback from your workers (as well as from external stakeholders):

## **5.1 TRAINING TOOL:**

This tool includes instructions for creating SCS trainings for both onboarding and ongoing trainings. You will then use the next two tools to track and manage the implementation of those trainings.

## **5.2 ONBOARDING TEMPLATE:**

A template for tracking the onboarding of new employees. It shows all the topics that should be covered in various types of onboarding, including the SCS trainings topics.

## **5.3 ANNUAL TRAINING TEMPLATE:**

A template to help you manage delivery of the various trainings that should be provided to your employees annually.

## **5.4 GRIEVANCE MECHANISM TOOL:**

Includes a template for collecting individual complaints and suggestions and a template to be placed next to the receptacle where you collect them.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.5.*



# 5.1 TRAINING TOOL

## INTRODUCTION

### Why is training important?

Every employee has a role to play in implementing the SCS. They should all understand your farm's commitment to decent labor conditions. This requires clear communication and ongoing, progressive trainings.

Effective training programs help ensure that employees understand the SCS, why it is important, and their role in ensuring its success.

### What kinds of SCS training should you provide?

Training your workers on your SCS is not a one-time event. It should happen continuously.

- 1. Onboarding training:** This training is for newly hired workers to integrate them into the farm. It covers all aspects of the farm's SCS that you are creating with this toolkit. It also establishes the expectations of their position. This training must be done every time you hire a worker, even if they are contract or temporary workers.
- 2. Ongoing training:** This involves continuous, progressive trainings for all workers and managers on the topics covered in onboarding. Providing ongoing trainings increases knowledge retention. These should occur at least once a year.

### Who should receive training?

- Management should be introduced to the management system elements and how they support social compliance.
- The SPT or Social Compliance Monitor need(s) in-depth training on the SCS standards and strategies for applying them.
- All workers need training on workplace rules and expectations.
- Temporary workers must receive full onboarding, appropriate to their role.

## INSTRUCTIONS

Training workers on your SCS is an important component of both onboarding and ongoing training. This tool helps you identify the specific aspects of your SCS that should be covered. You will then use the next two tools in this chapter to develop an annual training schedule and track the specific trainings delivered.

Tool



**WHAT:** A guide to creating, managing, and carrying out trainings for employees.

**HOW:** Use to apply the lessons from Chapter 4.5 of Palma Futuro handbook

**WHO:** Social compliance designee(s) and management at small palm oil suppliers

**SCS CATEGORY:** Communicating, Training & Grievance Mechanisms



**STEP 1.** Take out your Process Map (2.1), Risk Assessment (2.2), Labor Policies (3.1), Procedures (3.2), and Stakeholder Map (4.1).

**STEP 2.** Starting with your Process Map and Risk Assessment, list the trainings workers need to receive to minimize the risks you found. For example, you may need to train your workers the types of PPE you provide and how to use them, or what to do if children are in the workplace. Write these in Annex 5.1 below.

**STEP 3.** Repeat this same process for the important information about your Policies and Procedures (3.1 and 3.2) and your Stakeholder Map (4.1) that you want to include in the trainings.

**STEP 4.** Determine who at your farm will be responsible for managing each training topic, likely the SPT or Social Compliance Monitor. Write their name in Annex 5.1 below.

**STEP 5.** After you have provided the initial onboarding training, be sure to provide ongoing on-site training for your workers. You can use the next two tools to track when you should be providing those trainings.

**STEP 6.** You should periodically evaluate the trainings by assessing how much knowledge the trained workers retained, what they thought of the instructor, and what they thought of the course itself. This can be in the form of a self-assessment form you provide to the trained workers. Evaluating your own training performance allows you to identify areas for improvement.

**ANNEX 5.1: SCS Training Topics**

Type of Training Topic (Risk, Policy, Procedure, or Stakeholder)	Training Topic	Person Responsible
<i>Policy</i>	<i>All child labor policies, including steps for remediation if a child is found.</i>	<i>Human Resources Officer</i>





## CHECKLIST FOR ONBOARDING TEMPORARY WORKERS

Temporary workers, no matter how short their contract, should receive all of the aforementioned onboarding that any normal worker receives. Even though they may only be joining your workforce for a brief period, the same risks, policies, and procedures apply to them. However, farms will often hold trainings during the low season when there is surplus time, but when temporary hires are less likely to be present.

Farms therefore need to go the extra mile to ensure that temporary workers receive all necessary training before starting their work. Use the following checklist to ensure temporary workers are properly on-boarded.

- Hold an annual onboarding training for all workers, no matter if there is a new hire or not.
- Consider recording the trainings so that your company does not have to expend time and energy holding the entire onboarding training for each new hire. That way, the new person can watch the video.
- If a temporary hire leaves and then comes back for the next high season, you do not have to repeat the entire social compliance training. However, you should at least provide a refresher Health and Safety training, any job-specific training, and training on any updates or changes to policies and procedures since their last onboarding.







## 5.2 GENERAL ONBOARDING TEMPLATE

### INSTRUCTIONS

**STEP 1.** When a new worker has joined your farm, fill out their general information (the type of hire, their name, their job ID, and so on).

**STEP 2.** After they have participated in the onboarding training, check off all the topics the onboarding training covered. If there is a training topic you developed in the previous exercise, 5.1, you can add that to the template and check it off.

**STEP 3.** Review the document with the worker and have them sign it.

**STEP 4.** Keep the signed document for your records. You will consolidate all the onboarding trainings provided in the next tool, 5.3.



ANNEX 5.2A: General Onboarding Tracker

**GENERAL ONBOARDING TRACKER**

<b>TYPE OF HIRE</b> <input type="checkbox"/> Temporary <input type="checkbox"/> Permanent <input type="checkbox"/> By day <input type="checkbox"/> By amount harvested <input type="checkbox"/> Other (specify)	Name of worker:
	ID number:
	Job position:
	Onboarding date:
	Personnel file:
	<input type="checkbox"/> Citizen <input type="checkbox"/> migrant <input type="checkbox"/> apprentice <input type="checkbox"/> juvenile <input type="checkbox"/> worker( tick all that apply):
	Other notes (language, literacy level, any special condition)

GENERAL ORIENTATION AND SCS INTRODUCTION	JOB SPECIFIC ONBOARDING	CONFIRMATION OF ONBOARDING
<input type="checkbox"/> Welcome to the farm	<input type="checkbox"/> Introducing supervisor and new coworkers	Confirm you have received the relevant onboarding:
<input type="checkbox"/> Organizational structure overview	<input type="checkbox"/> Job profile and requirements	
<input type="checkbox"/> Farm policies, including:	<input type="checkbox"/> PPE	_____
		Signature of Worker and ID Number
<input type="checkbox"/> Child Labor: Policy and remediation steps in the case of a child being found on the farm	<input type="checkbox"/> Workplace training	
<input type="checkbox"/> Forced labor: Policy, explanation, and what to do in case you hear of forced labor	<input type="checkbox"/> Specific training for the job (chemicals, heights, tools, etc.)	
		_____
		Name and signature of person responsible for onboarding
<input type="checkbox"/> OHS: Person or committee in charge of OHS, risk matrix, PPE, emergency preparedness plan, tools, medical exams, bathrooms, potable water, food consumption, first aid, chemical mgmt, living quarters	<input type="checkbox"/> Others	
<input type="checkbox"/> Discrimination: Policy, including sexual harassment policy; comments and suggestions box and procedure		
<input type="checkbox"/> Disciplinary practices: Internal regulations and rules, disciplinary measures specifically		
<input type="checkbox"/> Working Hours: Signing in and out, rest times and meal times, holidays, overtime, exit permission		
<input type="checkbox"/> Wages and benefits: Exact description of payment process, legal compliance with minimum wage and salary deductions, payment schedule, payment format, overtime pay, explanation of pay-stub, loan conditions. Benefits.		
<input type="checkbox"/> Regular Employment: Work contract, payment of obligatory benefits including social security.		



# 5.3 ANNUAL TRAINING TRACKER

## INTRODUCTION

This template is designed to help you keep track of and plan for all the trainings you should provide in a year - including but not limited to your SCS trainings, which you developed in tool 5.1. This template lists all the trainings you should be providing each year, the frequency with which each training should be provided, the topics to be covered in the trainings, the people that should be trained, the number of people per training, and the suggested length of each training.

## INSTRUCTIONS

**STEP 1.** Fill out the year at the top of the template.

**STEP 2.** At the beginning of every calendar year, review all the information about each training to familiarize yourself with what trainings your farm will need to plan for that year and what each one will cover. Fill out who at your farm will be responsible for managing each training.

**STEP 3.** Every time you provide a training, put an “X” under the month you provided it. Write the specific date you provided it next to that X.

### Tool



**WHAT:** Guidance for the purpose and development of grievance mechanisms.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.5) of Palma Futuro handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**SCS CATEGORY:** Communicating, Training & Grievance Mechanisms









# 5.4 GRIEVANCE MECHANISM TOOL

## INTRODUCTION

It is important to provide channels for workers to communicate their feedback and input to their supervisor and employers. This can help identify areas of improvement while also making your workers and external stakeholders feel heard. Grievance mechanisms are one way of gathering anonymous feedback. The feedback could be a question, a complaint, a concern, or an opinion, about any aspect of your farm's operations.

## INSTRUCTIONS

Follow the checklist to create a grievance mechanism at your farm.

**STEP 1.** Establish a way for people to pose questions, express concerns, or file a complaint. The "Complaint and Suggestions" template included as **Annex 5.3** below is one way of doing so. However, if printing the form is unrealistic for your farm or if you only have a few workers, you could simply provide workers with blank pieces of paper on which to write their grievances.

**STEP 2.** However you decide to collect feedback, ensure the process is as open, anonymous, and confidential as possible – and that employees understand this. You could use the sample poster included in **Annex 5.4** to help communicate this or address it during onboarding and ongoing trainings.

**STEP 3.** Assign a person to be responsible for receiving, registering, and processing the feedback people submit.

**STEP 4.** That person should use the tools in Chapter 7, Correcting and Remediating, to track all the grievances your farm receives and manage your farm's response.

**STEP 5.** Include a description of this procedure as part of the onboarding trainings.

## Tool



**WHAT:** Guidance for the purpose and development of grievance mechanisms.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.5) of Palma Futuro handbook.

**WHO:** Social compliance designee(s) at small palm oil farms.

**CATEGORY:** Communicating, Training & Grievance Mechanisms



### ANNEX 5.3: Complaint and Suggestion Template

COMPLAINT AND SUGGESTION TEMPLATE						
<b>Personal Information</b>		<b>Date:</b>				
First and Last Name:		Day:	Month:	Year:		
Phone number:		Indicate the relationship with the organization				
Email:		Worker	Community	Supplier	Visitor	Other (please specify)
Town or: Municipality:						
Mark the issue to be addressed with an X						
Anonymous: Yes ___ No ___ Complaint ___ Suggestion ___ Other ___ (please specify):						
Explain the situation						

### ANNEX 5.4: Complaint and Suggestion Template

NOTICE
<p><b>TO ALL WORKERS, EMPLOYEES, &amp; SUPERVISORS</b></p> <p>You can submit any complaints, suggestions, or general feedback you have for our farm here.</p> <p>Simply take a blank complaint and suggestion form, fill it out, and insert it in the box.</p> <p>Your feedback can be anonymous if you choose for it to be so - simply indicate that you would like to remain anonymous on the form.</p> <p>We will review and address your concerns as quickly as possible.</p> <p><u><b>YOUR REQUEST WILL ALWAYS BE HANDLED CONFIDENTIALLY AND WITHOUT FEAR OF RETALIATION</b></u></p> <p>Thank you for contributing to the continuous improvement of our facility!</p>







Photography: Palma Futuro Project, funded 100% by the United States Department of Labor



# 6

## INTRODUCTION TO MONITORING AND INDEPENDENT REVIEW

Effective monitoring and independent review not only help you understand your current labor performance, they also provide insight about the effectiveness of your management system. The information gathered through monitoring provides a baseline for action.

This chapter includes the following tool:

### 6.1 MONITORING TOOL

This tool provides questions to answer throughout your monitoring of your SCS activities.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.6.*



# 6.1 MONITORING TOOL

## INTRODUCTION

### What is monitoring?

**Monitoring** is an umbrella term that includes a variety of methods you may use to evaluate performance. Effective monitoring and independent review not only help you understand your current labor performance, they also provide insight about the effectiveness of your management system. It builds upon the information gathered with all the preceding tools in this toolkit.

### Who should monitor?

The monitoring assessment may be conducted by an employee of the farm, such as be the manager, SPT, or Social Compliance Monitor. It is important to maintain an objective perspective when monitoring one's own farm. Managers need to have a self-critical vision and be open to possible non-compliance with labor standards. Identifying violations is as much in the best interest of farm management as it is, any deficiencies could disqualification from many certification schemes, and even legal or civil liability

## INSTRUCTIONS

The present tool guides you through an internal assessment of your SCS, which is one of the ways you can monitor your SCS. This internal assessment of has 3 steps: (1) a site observation of your workplace, (2) a review of documents, and (3) interviews with workers.

**STEP 1.** Take out your 2.1 Process Map, 2.2 Risk Assessment and your 3.1 Labor Policies.

**STEP 2.** Review these and determine what you need to monitor in order to (1) address the issues you determined to be critical in your 2.2 Risk Assessment, and to (2) meet the standards set forth by your 3.1 Labor Policies. Since your policies cover each of the nine labor performance elements, this means you will be monitoring all nine labor elements.

- For example, if the presence of children in the workplace is a critical issue according to your Risk Assessment, then the issue you need to monitor would be “presence of children in the workplace.”

## Tool



**WHAT:** Guidance for monitoring a farm's Social Compliance System.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.6) of Palma Futuro handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**SCS CATEGORY:** Communicating, Training & Grievance Mechanisms





**STEP 3.** Write all of these issues or SCS areas to be monitored in the first column of **Annex 6.1** below.

**STEP 4.** Now, it's time to monitor them. For each of the issues or SCS areas listed in **Annex 6.1**, follow the relevant guidance in **Annex 6.2** to (1) conduct an on-site observation, (2) review documents, and (3) interview workers.

**STEP 5.** Take notes in **Annex 6.1** on your observations from these three monitoring forms as you go through them for each issue.

**STEP 6.** After completing the independent assessment, review the findings for each issue and determine if your farm is in compliance with the appropriate standard and policy for that labor element. For example, you may have identified that you are at a higher risk for having children in the workplace, because you have dormitories where families live. However, if after your walk-through and interviews with workers, you determine that there is sufficient signage and fencing to ensure that children never enter the workplace you are in compliance.

For those that are not in compliance, describe how they are not in compliance.

### ANNEX 6.1: Monitoring Tracker

#	Issue or SCS Area to monitor	During your site observation: what did you find and observe? (Write date of visit)	During your review of the documents: what did you find? (Write date of review)	During your interviews: what did you find ? (Write date of interviews)	Is there a non-compliance? (Y/N)	If NO: Describe the findings If YES: Describe the findings
1.	The presence of children in the workplace.	Children playing near the worksite and no signage to tell them where not to go Jan 1, 2022	No policy explicitly stating there are no children allowed near the work areas Jan 2, 2022	People understand their children should not touch tools or be near the work area, but nobody is aware of any rule or policy against it Jan 3, 2022	N	Still no signage or policy
2.						
3.						
4.						
5.						
6.						



## ANNEX 6.2: Internal SCS Assessment Guidance

Site Observation
Conduct operation walk-through following the flow of production from harvest to delivery of raw materials to extractor plants.
Minimize the number of managers and supervisors that accompany you on the walk-through. One or two escorts based on knowledge/responsibilities are usually sufficient.
For OHS issues: verify that fire exits in buildings (e.g. storage or maintenance areas, administrative buildings, etc.) exist and open on demand; no means to prevent exit; panic bars in good working order; clear egress once exit opened; emergency exits clearly marked; nearest exits clearly marked; prohibited areas clearly marked; electrical cabinets closed and sealed; lockout tag out procedures and tools (tags, locks, warning labels and signs) clearly available near electrical cabinets; first aid cabinets and equipment; emergency lighting; emergency preparedness and evacuation plans in place; and that employees are trained on using these.
Indoor working conditions should be verified for adequacy if there is potential for risks such as heat, light, noise and dust. Use measuring devices to determine air quality, noise level, temperature. This is a good/easy thing to do.
Following the worksite walk-through, conduct a walk-through of the dormitory facilities, canteens, washrooms, field, changing rooms if relevant. Note the condition and adequacy of these areas.
Give sufficient attention to all SCS elements during the walk-through.
If potentially underage workers are identified during the walk-through, follow-up to investigate through interviews and document review

Interviewing Workers
Select at least 5% of workers, max. 100 workers. Conduct individual and group interviews for balanced response.
Select workers who are representative of the workforce population (gender, race, age, religion, functional departments, etc.).
If you have contracted or migrant workers, make sure to include them as well
Do not allow supervisors or managers to influence the selection of workers for interviews or the interviews.
Conduct on-site interviews in areas that protect worker confidentiality and where the worker would feel comfortable. Make sure supervisors or managers are not in or near the space where the interviews are conducted.
Make sure to tell the workers that everything they say is confidential and that management has been warned against retaliation.
Ensure sensitivity to cultural and gender issues.
Plan for an average of fifteen minutes per interview; however, use common sense in terminating interviews that are becoming nonproductive and extending interviews with people who are candid or openly addressing critical issues.
Formulate questions prior to the interviews to make sure you cover all specific areas of the SCS through the aggregated interviews.



## Interviewing Workers

If you plan to take notes, ask the workers if it is OK and clearly explain reason for taking notes. Try to minimize note taking as much as possible during the interview. Finish writing your notes immediately after the interview, so you have accurate documentation.

Ask workers specifically about follow up on previous corrective action plans

### Types of questions

#### LABOR ISSUES

- Do workers know about and understand your policies related to labor and working conditions?
- Do workers understand their rights under the law related to freedom of association and collective bargaining?
- Do workers understand how their wages are calculated, for base time, performance and overtime?
- Are workers aware of any dismissal, transfer, demotion or other punitive action against workers due to their exercising their rights under either their contracts or local or national law?
- Ask workers about the status of trade unions, worker committees or other worker groups in the farm/plantation and whether there is management interference.
- Ask questions to determine conformance to discrimination and sexual harassment policies.
- Do workers understand the farm's grievance mechanism, and do they feel it is operational and free from retaliation?

#### OCCUPATIONAL HEALTH AND SAFETY ISSUES

- Do workers feel safe and protected in their jobs? For example, are they provided with PPE that is appropriate and works? Is their physical environment free of hazards? Are they expected to reduce physical hazards or are engineering controls in place? Are there job hazards assessments done routinely and when the processes or materials change? Have issues submitted through the complaints management and resolution mechanism been addressed?
- Do they feel there is adequate safety equipment, such as extinguishers/hydrants and first aid kits? Are there sufficient safety drills if an emergency, such as a typhoon, flood or wind storm, were to occur and necessitate an evacuation from buildings? Witness the emergency mock drills and make note of shortcomings; ask an employee to pretend he/she has just been injured and explain what to do next.
- Are they instructed and trained on these risks at regular intervals?
- Have any workers been involved in accidents at the facility and, if so, what happened afterwards?
- Is the environment comfortable to work in, in terms of exposure to heat and sun?
- Do they feel that chemicals, waste and other substances are stored or disposed of safely and appropriately at the facility?
- Do they feel toilets and lockers are maintained properly? Are they provided with water?

If the you employ contract workers, make sure to ask questions that address possible violations and areas of abuse, such as: Do you feel different from a permanent employee? Why?

Conduct some worker interviews off-site if possible

## Document Review

Select personnel files, time cards and payroll records without management interference

Make sure you review the relevant documents for the following areas:

- 1. Human resources:** Management-worker committee meeting minutes, memos and letters, budgets related to implementing labor policy, training material, logs and curricula or written communications to workers that address all issues, training records and instructor qualifications.
- 2. Working conditions:** Contracts for all workers; policies and procedures related to wages, benefits, hours and leave; evidence of communication and training on wage calculation; personnel files; time cards; payroll records and pay stubs (selected without management interference); criteria used to set performance pay bonuses; and employment and termination records.
- 3. Are employee payment methods secure?** Are employees able to have payments deposited into an account? Are they paid in cash at the facility (which can lead to significant risks during the trip home)?
- 4. Collective bargaining:** Collective bargaining policy, agreement and documentation (such as minutes and records of collective bargaining sessions).
- 5. Discrimination:** Discrimination policy; related procedures; documentation handling discrimination issues; diversity training and attendance log; hiring, promotion and termination records; gender demographics in facility at worker and manager levels.
- 6. Retrenchment:** Policies and procedures for workforce reduction, severance and transition; documentation of prior workforce reductions; minutes of management meetings and communications to workers on this issue.
- 7. Complaint management and resolution mechanism:** Documented procedure, communications, records and logs of grievance handling.
- 8. Child labor:** Procedure for age verification, documentation of apprentice program, birth and medical records and school records of workers.
- 9. Forced labor:** Employment contracts (as well as for those workers hired through recruitment agencies), payroll records, timesheets and wage deduction, worker passports and IDs.
- 10. Health and safety:** Accident and medical treatment logs, equipment safety logs, logs of fire and safety drills, health and safety risk analyses, government health inspection reports, safety certificates and training curriculum and logs, and evidence of changes to all of this when company processes, methods, chemicals, materials are changed, reordered etc.

Balance your time and effort investigating all areas of labor standards at work. Document review is particularly critical for wages, working hours, health and safety, use of sub-contractors, hiring and termination.

If the company employs contract workers, address potential areas of abuse in the document review. Specifically review the contract with the workers.

Identify all significant incidences of non-conformance in preparation for your management meeting.







*Photography: Palma Futuro Project, funded 100% by the United States Department of Labor*



# 7

## INTRODUCTION TO CORRECTING AND REMEDIATING

Once you have identified your SCS's areas of improvement through your risk assessments, stakeholder engagement, grievance mechanisms, and monitoring, you will need to correct those issues. This requires both daily management of corrective actions as well as longer-term improvement planning.

To help you with both, this chapter includes 3 tools:

### **7.1 ROOT CAUSE ANALYSIS EXERCISE**

An exercise for identifying the root causes of your issues.

### **7.2 CORRECTIVE ACTION TEMPLATE**

A template for filling out specific corrective actions to address the issues you listed in your Monitoring Tool (6.1). All of the corrective actions you fill out here should be consolidated in the next tool.

### **7.3 CORRECTIVE ACTION REGISTRY**

This tool consolidates all the corrective actions you are managing, and in doing so, helps you manage them all.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.7.*



# 7.1 ROOT CAUSE ANALYSIS EXERCISE

## Tool



**WHAT:** An exercise for identifying the root causes of your deficiencies

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.7) of the Palma Futuro handbook

**WHO:** Social compliance designee(s) at small palm oil suppliers

**SCS CATEGORY:** Correcting and Remediating

### INTRODUCTION

Once you have identified your risks using the 2.1 Process Map and 2.2 Risk Assessment tool, collected feedback from your stakeholders using the 4.1 Stakeholder Tool and the 5.4 Grievance Mechanism tool, and monitored your operations with the 6.1 Monitoring Tool, you will need to identify the underlying causes of all the identified issues. This **root cause analysis exercise** helps you do so. It guides you through a process of identifying the ingrained structural issues that are not explicitly apparent in a given issue. These are the root causes.

#### Why should I do a root cause analysis?

It is common for the same problems to keep coming up unless the root cause is addressed. While fixing individual issues as they arise might get your farm through the next assessment, it will not lead to sustainable solutions. Committing to the root cause analysis process will ultimately save your time, money, and resources.

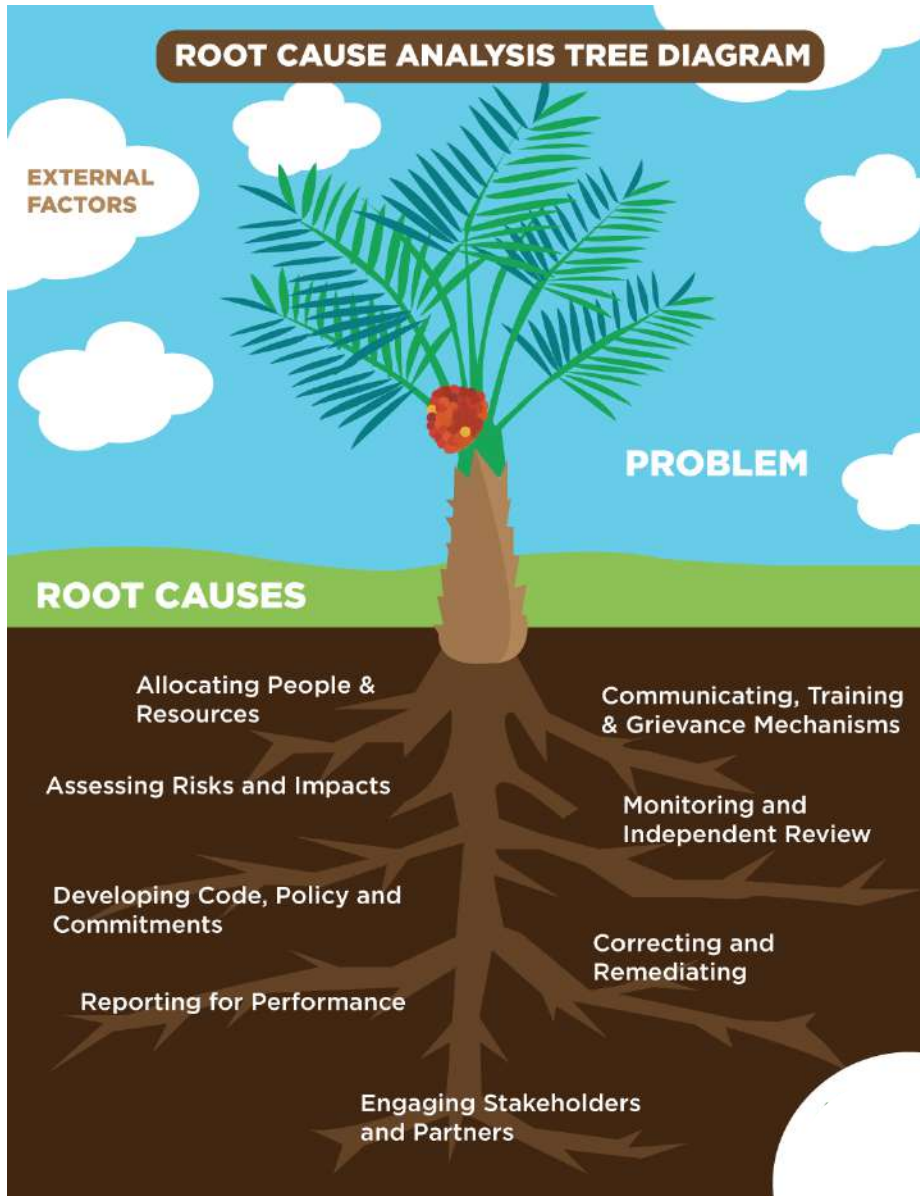
#### What do I do once I identify the a root cause of an issue?

You should follow root cause analysis with development of a corrective action plan using the next two tools in this chapter. All the information you gather throughout this exercise will directly feed into that corrective action plan – so it is important you spend time, energy, and resources on completing it.

It is important to consult your root cause analysis with frequency to ensure your farm continues to address root causes.



## SAMPLE TREE DIAGRAM



### INSTRUCTIONS

This exercise should be done by the person or people assigned to manage the SCS. It should be repeated for every issue that you have identified and prioritized.



### **Use the tree diagram below as you go.**

Take out your 6.1 Monitoring Tool. Complete the following process for every issue you identified as non-compliant: those issues where your farm does not yet meet the standard.

**STEP 1.** Identify the problem, drawing on information gathered from any of the sources listed above (e.g., risk assessment, etc.) Write it in the “Treetop” text-box of the tree diagram.

**STEP 2.** Brainstorm the causes of that problem. List as many causes as possible. For example, if the problem is workplace injuries, potential causes could include not enough training on how to use machinery, OHS policies not written in language workers understand, personnel don’t wear PPE, or many other reasons.

**STEP 3.** If conducting this exercise in a group, collect and organize the individual responses and identify areas of consensus and divergence. Consensus is good, but there may be times when just one person identifies a really important cause, and that should not be overlooked. Then, consolidate all the causes into one list.

**STEP 4.** Identify which Management Systems category each cause is associated with (all categories are in the tree below). Write each problem in the tree diagram under the corresponding management system root.

**STEP 5.** Do the “5 why’s” for each of the causes. Consider the main problem and then ask “why?” five times in response to the issues that emerge. With each successive “why,” you will gain a deeper understanding of the underlying systemic factors that caused the problem. For example, if the cause is that personnel don’t wear PPE, think deeper about why: perhaps the answer will be that workers find it uncomfortable, or that the company does not provide a variety of sizes, or wearing PPE slows workers down. Once you have asked ‘why?’ several times, you should arrive at a potential solution. Transfer the solution to your improvement plan and develop steps to move towards it.







## 7.2 CORRECTIVE ACTION TEMPLATE

### Tool



**WHAT:** A template for creating and using corrective actions.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.7) of Palma Futuro handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**SCS CATEGORY:** Communicating, Training & Grievance Mechanisms

### INTRODUCTION

**Corrective actions** are steps taken to eliminate the cause and root cause of an issue or violation within your SCS.

#### Why take corrective action?

Addressing the issues in your SCS is key to improving labor conditions and enhancing management system capacity. Your farm, your workers' conditions, and compliance with national and international standards depend on your ability to remediate the issues you identify throughout toolkit Chapters 2, 4, 5, and 6 and the root causes identified in the previous tool, 7.1 Root Cause Analysis as well as issues you identify through other means.

### INSTRUCTIONS

**STEP 1.** Take out your completed 6.1 Monitoring Tool and your 7.1 Root Cause Analysis.

**STEP 2.** Review the violations or issues that you listed in 6.1 and analyzed in 7.1.

**STEP 3.** For each violation, fill out the Corrective Action Plan Template in **Annex 7.1** below. You can refer to the example in **Annex 7.2**. Below is more guidance to help you:

- **Farm Name:** Always put your farm name on every corrective action template.
- **Name of Reporting Person:** This is not a mandatory field. Only include it if the issue being corrected was reported by a specific person or stakeholder.
- **Name and Position of Person Responsible for Corrective Action Plan:** This should be the person, or one of the people, you assigned to be responsible for your SCS.
- **Labor Performance Element and Specific Issue:** The labor performance element is one of the nine elements that form the labor performance piece of your SCS. Specific Issue is a few words describing the violation being corrected.
- **Root Cause Analysis of Problem:** Write in the root cause that you determined using 7.1 Root Cause Analysis Tool.

- **Potential Challenges:** Consider some challenges to addressing the issue. Are there logistical challenges? Are there budgetary constraints?
- **Code or Standard being violated:** Write down any code or standard that your farm is certified to, like the RSPO, that this issue is in violation of.
- **Corrective Action #:** You will assign this number. The numbers should be assigned consecutively as the corrective actions are developed, starting at 1, and counting upwards.
- **Proposed Corrective Action Steps:** List all the steps you will need to take to address the issue. Consider whether procedures or even policies need to be changed to make sure the issue does not recur.
- **Due Date:** Determine when you need to address this issue by.
- **Likely Costs:** If you will need to make any purchases or hire additional labor to address the issue, write them down here and the cost of each.
- **Update:** Provide an update on the status of the corrective action steps. Make sure to write the date below it of the update.
- **Were the implemented actions effective:** On the due date, determine whether the actions you took actually addressed the issue. If they did, close this corrective action, date it, and sign it below. If they did not, update the corrective action plan steps.



**ANNEX 7.1:** Corrective Action Plan Template

<b>CORRECTIVE ACTION PLAN</b>			
Farm Name		Corrective Action #	
How was Corrective Action Identified (Independent assessment, grievance mechanism etc.)		Proposed Corrective Action Steps (List all)	
Name of Reporting Person (NOT MANDATORY)			
Date			
Name and position of person responsible for Corrective Action Plan			
Labor Performance Element		Start date	
Specific Issue		Due date	
		Likely Costs	
Current Situation/Problem			
Root Cause Analysis of Problem			
Potential Challenges		Progress of Proposed Action	
		Update	
		Date	
		Status of Proposed Action	
		Were the implemented actions effective (Yes or No)	
Code or Standard being violated		<i>If yes close the action, if no describe the new Corrective Action Plan</i>	
		Closeout Date of Corrective Action	
Signature of person who reported the Corrective Action			
Signature of person responsible for Corrective Action Plan			



## ANNEX 7.2: Corrective Action Plan Example

CORRECTIVE ACTION PLAN			
<b>Farm Name</b>	Finca Mariposa	<b>Corrective Action #</b>	3
<b>How was Corrective Action Identified (Independent assessment, grievance mechanism etc.)</b>	Independent SCS Assessment	<b>Proposed Corrective Action Steps (List all)</b>	Develop a system for tracking the payments for each worker
<b>Name of Reporting Person (NOT MANDATORY)</b>	Jane Doe		Deliver payments to workers at the workplace
<b>Date</b>	January 1, 2022		Make sure payments are made in accordance with national law requirements
<b>Name and position of person responsible for Corrective Action Plan</b>	John Doe, SCS Manager		
<b>Labor Performance Element</b>	Wages and Benefits	<b>Start date</b>	January 2 2022
<b>Specific Issues</b>	Late and inconsistent salary payments	<b>Due date</b>	February 25 2022
		<b>Likely Costs</b>	
<b>Current Situation/Problem</b>	During the interviews with workers conducted during the independent SCS assessment, many reported their pay not being delivered in a timely manner and sometimes going up to 6 weeks without being paid.	Binder, notebook, folder and dividers for tracking payments for each worker	\$40
<b>Root Cause Analysis of Problem</b>	There is no system for tracking and managing payments, and workers have to travel to pick up their payments, which often delays their ability to get paid.		
<b>Potential Challenges</b>	Tracking payments, delivering payments to workers at the worksite, migrating all of the managers, paperwork over to the worksite	<b>Progress of Proposed Action</b>	
		<b>Update</b>	Worker interviews confirm they received payment at the worksite and on-time
		<b>Date</b>	February 24 2022
		<b>Status of Proposed Action</b>	
		<b>Were the implemented actions effective (Yes or No)</b>	Yes
<b>Code or Standard being violated</b>	<i>If yes close the action, if no describe the new Corrective Action Plan</i>		
	<b>Closeout Date of Corrective Action</b>	February 28, 2022	
<b>Signature of person who reported the Corrective Action</b>	Jane Doe		
<b>Signature of person responsible for Corrective Action Plan</b>	John Doe		

## 7.3 CORRECTIVE ACTION REGISTRY MATRIX

### Tool



**WHAT:** A template for tracking all corrective actions.

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.7) of the Palma Futuro Handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**CATEGORY:** Communicating, Training & Grievance Mechanisms

### INTRODUCTION

Corrective actions need to be tracked and logged for you to make progress on each one. Having a consolidated document with all of corrective actions in one place can help you manage all the violations, notice patterns in where your company is falling short of social compliance standards, and track progress.

### INSTRUCTIONS

**STEP 1.** Use the Corrective Action Registry in **Annex 7.3** to log each of your corrective actions from the previous tool, 7.2 Corrective Action Template. Each corrective action should be filled out in its own row in **Annex 7.3**.

**STEP 2.** For each corrective action, update the status as you go:

- Ongoing still in the process of revision.
- Failure to Close you attempted to correct the issue but were not successful.
- Closed the issue has been corrected.

**STEP 3.** Create a “Corrective Actions” folder or filing system. Place **Annex 7.3** at the front of the folder as a control document. Add and then organize the corrective action forms (Tool 7.2) by status (i.e., open, closed or ongoing).

**STEP 4.** Review your corrective actions at least once a month. If a corrective action is consistently postponed or you are unable to address the issue after repeated attempts, reconsider the action steps you are taking and whether new steps should be added.











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# 8

## INTRODUCTION TO REPORTING FOR PERFORMANCE

Transparency in your labor performance is critical for driving progress, supporting accountability, and recognizing achievements toward good labor performance. Reporting on performance is one way to achieve transparency. This process should be consistent and ongoing, at least on an annual basis.

This chapter includes 1 tool:

### **8.1 PERFORMANCE REPORTING**

A brainstorming exercise to determine which information you should report on.

*The tools in this chapter should be used to implement the lessons learned from the Palma Futuro Handbook's corresponding Chapter 4.8.*



# 8.1 PERFORMANCE REPORTING

## INTRODUCTION

Transparency around company labor performance and related initiatives is critical for driving progress, supporting accountability, and recognizing achievements toward good labor performance. Reporting to stakeholders on farm actions to resolve issues helps build and maintain trust and a positive relationship for future engagement. It can also reduce the amount of time you spend responding to questions.

### *What should my farm report on?*

Your farm should publicly communicate information on:

- ➔ Your risk and impact assessments (conducted in Chapter 2)
- ➔ Labor policy commitments (created in Chapter 3)
- ➔ Findings from your stakeholder map (conducted in Chapter 4)
- ➔ Any grievances you receive and your status addressing them (Chapter 5)
- ➔ Results from any further monitoring (conducted in Chapter 6)
- ➔ Steps taken to remediate issues (created in Chapter 7) particularly the status of your progress.
- ➔ All actions that you are taking with your stakeholders and SPT to reduce risks

Regular reporting on labor performance should be supplemented with other communication practices that foster dialogue about your farm responses to labor issues, where necessary.

## Tool



**WHAT:** A guide to reporting on your Social Compliance System performance

**HOW:** Use to apply the lessons from Chapter 4 (Section 4.8) of the Palma Futuro Handbook

**WHO:** Social compliance designee(s) at small palm oil farms.

**CATEGORY:** Communicating, Training & Grievance Mechanisms



## INSTRUCTIONS

**STEP 1.** Take out your corrective actions developed in the previous chapter. Of all the actions you have taken to address SCS issues, think about which you should report on based on the criteria presented above.

**STEP 2.** Next, determine which stakeholders from your 4.1 Stakeholder Tool you should report to for each issue.

**STEP 3.** Draft a report of your performance for the selected issues. Be sure to include a statement of your progress on each of your corrective actions. For corrective actions you are still working to close, report the reason why you did not yet address the issue. Finally, brainstorm: what did you observe in other SCS documents that you want to report out?







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