

# SELF-ASSESSMENT TOOL: PREVENTION AND MANAGEMENT OF CHILD AND FORCED LABOR RISKS

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Users' Guide



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## 1. Introduction

USDOL-ILAB awarded the Fair Labor Association (FLA)<sup>1</sup> a cooperative agreement to pilot the **U.S. Department of Agriculture's (USDA) Guidelines for Eliminating Child and Forced Labor in Agricultural Supply Chains**<sup>2</sup> focusing on the hazelnuts supply chain in Turkey.

The Guidelines recommend a set of practices for independent third-party monitoring and verification for the production, processing, and distribution of agricultural products or commodities with the goal of reducing the likelihood that such products or commodities imported into the United States are produced by child labor and/or forced labor.

FLA developed a comprehensive yet user-friendly and easy-to-use **self-assessment tool** for companies with agricultural supply chains to apply the USDA Guidelines as part of their social compliance, sustainability or human rights due diligence programs. The tool is intended to provide companies that use the tool with a measure of the extent to which they are applying the elements of the USDA Guidelines in one or more of their supply chains.

The self-assessment tool presented in this paper has been created by BSD Consulting in cooperation with the FLA. This document provides an overview of the tool, how it can be used by a company, and how the results of the self-assessment can be interpreted.

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<sup>1</sup> <http://www.fairlabor.org/blog/entry/fair-labor-association-awarded-487-million-address-child-labor-turkey>

<sup>2</sup> <https://www.federalregister.gov/documents/2011/04/12/2011-8587/consultative-group-to-eliminate-the-use-of-child-labor-and-forced-labor-in-imported-agricultural>

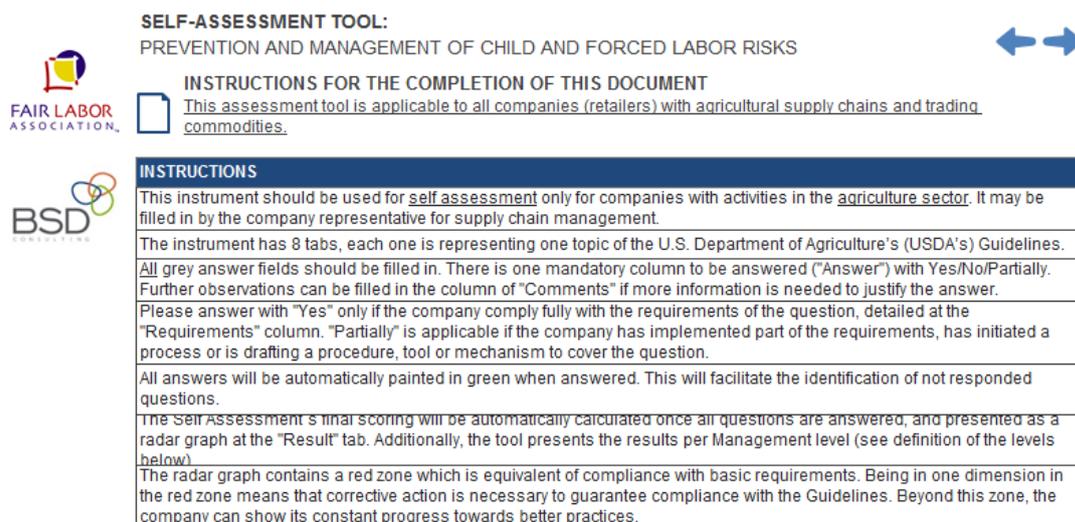
## 2. Structure of the Self-Assessment Tool

The FLA Self-Assessment tool consists of four parts:

- 1- Instructions and Definitions
- 2- Company Information
- 3- Eight Assessment Topics
- 4- Management Level and Compliance Results

The first part contains general instructions for the completion of the tool and important definitions.

Application of the self-assessment tool can be repeated each year to measure the progress and benchmark the previous year's results directly in the tool. Therefore, we recommend saving a blank copy of the tool before initial usage.



**SELF-ASSESSMENT TOOL:**  
PREVENTION AND MANAGEMENT OF CHILD AND FORCED LABOR RISKS

**INSTRUCTIONS FOR THE COMPLETION OF THIS DOCUMENT**  
This assessment tool is applicable to all companies (retailers) with agricultural supply chains and trading commodities.

**INSTRUCTIONS**

This instrument should be used for self assessment only for companies with activities in the agriculture sector. It may be filled in by the company representative for supply chain management.

The instrument has 8 tabs, each one is representing one topic of the U.S. Department of Agriculture's (USDA's) Guidelines.

All grey answer fields should be filled in. There is one mandatory column to be answered ("Answer") with Yes/No/Partially. Further observations can be filled in the column of "Comments" if more information is needed to justify the answer.

Please answer with "Yes" only if the company comply fully with the requirements of the question, detailed at the "Requirements" column. "Partially" is applicable if the company has implemented part of the requirements, has initiated a process or is drafting a procedure, tool or mechanism to cover the question.

All answers will be automatically painted in green when answered. This will facilitate the identification of not responded questions.

The self assessment's final scoring will be automatically calculated once all questions are answered, and presented as a radar graph at the "Result" tab. Additionally, the tool presents the results per Management level (see definition of the levels below).

The radar graph contains a red zone which is equivalent of compliance with basic requirements. Being in one dimension in the red zone means that corrective action is necessary to guarantee compliance with the Guidelines. Beyond this zone, the company can show its constant progress towards better practices.

Illustration 1 - Instructions and Definitions

DEFINITIONS
<b>Company</b> – Any company adopting the U.S. Department of Agriculture's (USDA's) Guidelines for Eliminating Child and Forced Labor program.
<b>Supplier</b> - Downstream supplier Tier 1 of the company: Producer, processor, traders, intermediary or service providers.
<b>Topic</b> - U.S. Department of Agriculture's (USDA's) Guideline section.
<b>Sub-topic</b> - Related to the of sub items of the topic or related topics.
<b>Requirements</b> - Elements that are required to confirm a positive answer and which could be evidenced in case of an independent assessment.
<b>Recommended practices and guidance</b> - Guidance on interpretation of the question and recommendations based on best practices regarding the question which can serve as input for corrective action plans..
<b>Management Level Scoring:</b>
<b>1 Basic compliance</b> - A management level that considers existence of company policies and practices focused on compliance with local legislation and international standards with the objective to guarantee that no violation regarding child and forced labor occurs in the supply chain and in the company's own operations.
<b>2 Advanced level</b> - Level that considers, beyond legal compliance, the existence and maintenance of policies, procedures, monitoring and reporting tools that allow the company to have control over risk, mitigation programs and compliance status of suppliers, relevant partners and its own operation.
<b>3 Best practice level</b> - Defines a management level which can be considered being of excellence in managing child labor and forced labor. Companies in this stage have reached a high degree of transparency and public disclosure and use their market position to influence their value chain partners and peers to actively campaigning against child and forced labor.

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To better understand the assessment requirements and the explanations provided for each question, please refer to the two columns below, namely “Select Answer” and “Further comments and justification of the answer”).

Guideline topic area	Assessment area as described in the USDA Guidelines.
Detailed topic area	Detailed issue of the assessment area.
To be answered by	The supply chain actor to whom the assessment is addressed.
Question to be answered	The key question to be answered.
Requirements that need to be fulfilled to positively answer the question	The requirements to be met by the company in order to answer the question with yes.
Management level scoring	Each question is attributed to one of the three levels: <b>1 Basic compliance</b> <b>2 Advanced</b> <b>3 Best practice</b>
<b>Select answer</b>	There are 4 options of answers: - <b>Yes</b> – when all requirements are attended - <b>Partial</b> – when part of the requirements are attended - <b>No</b> – not compliant - <b>N/A</b> – not applicable
Recommended practices and guidance regarding the question	Presentation of good practices and guidance related to the requirements.
<b>Further comments and justification of the answer</b>	Relevant comments related to the answer which the company wants to have registered.

### 3. Company Information

Prior to the delving into the assessment questions, some details about the company and the assessment scope are needed.

In the *General Data* section, the company should provide some profile information, including the name of the person responsible for completing the assessment. The responsible person may not necessarily be the person who has responded to the assessment questions. In responding to the questions It is recommended that a group or several persons who have knowledge of the subject matter underlying each question participate in preparing the responses.

The section titled *Assessment Scope* is very important to define clearly the scope of the assessment. This is so because the tool may be applied separately for different operational units within the same corporation or for different commodities. The tool is meant to be filled out at the level of a corporate entity (buyer), but it may also be applied at the level of a supplier.

SELF-ASSESSMENT TOOL: PREVENTION AND MANAGEMENT OF CHILD AND FORCED LABOR RISKS	
0 COMPANY DATA	
GENERAL DATA	
Company name	
Location of headquarter	
Location of branch(es) under assessment (if any)	
Name of responsible person for assessment:	
Position:	
E-mail	
Telephone	
Date of last assessment	
Place and date of current assessment (if any)	
ASSESSMENT SCOPE	
Business unit(s) or department(s) assessed with the tool	
Commodities assessed under the scope of this assessment	
Regions or countries involved in the targeted supply chain	
The company sources directly from farmers? (Yes/No/Partially)	
If yes or partially, please describe type of relationship with farmers	
Further observations	

Illustration 2 - Company Data

## 4. Assessment Topics

The next sections represent the core of the self-assessment tool. Each of the 8 topics covered by the USDA Guidelines is covered in a separate sheet:

- Standards on Child Labor and Forced Labor
- Supply Chain Mapping Risk Assessment
- Communications including Grievance Mechanism
- Monitoring
- Remediation
- Internal Process Review
- Independent Third Party Monitoring
- Independent Third Party Verification

The respondent must answer every question of the assessment selecting one of the following options:

- Yes
- No
- Partially
- Not Applicable (n/a).

In order to properly answer each question, the company must indicate whether it is fully, not at all, or partially attending the requirements indicated for each question. The option of "Not Applicable (n/a)" as a response may only be used if the question is not related to the scope under assessment.

## 5. Attributed Management Levels

The response to each question is linked to a management level:

### 1 - Basic compliance

Management level that has created company policies and practices focused on compliance with local legislation and international standards with the objective to assure that no violation regarding child and forced labor occurs in the supply chain and in the company's own operations. Companies that comply with the USDA Guidelines must at least achieve basic compliance.

### 2 - Advanced

Management level that beyond achieving basic compliance, maintains policies, procedures, and monitoring and reporting tools that allow the company to have control over risk, mitigation programs and compliance status of suppliers, relevant partners and its own operation.

### 3 - Best practice

Management level that can be considered achieving excellence in managing child labor and forced labor. Companies at this management level have reached a high degree of transparency and public disclosure and use their market position to influence their value chain partners and peers to actively campaign against child and forced labor.

## 6. Evolution of Responses

The respondent can monitor the progress of the responses during the assessment. Each assessment topic shows how many questions are left to be answered. In order to get a proper Management Level and Compliance Result, all questions have to be answered.

1 Standards on Child Labor and Forced Labor								Remaining answers:	18
Guideline topic area	Detailed topic area	To be answered by	Question to be answered	Requirements that need to be fulfilled to positively answer the question	Management level scoring	Select answer	Rec		
1.1 Standards on Child Labor and Forced Labor	Internal Policy	Company	Do you have an internal policy for responsible business conduct along the supply chain?	The company shall have a policy formally signed by senior management which includes the commitment to preserve fundamental rights of workers, protecting workers against from any form of abuse, violence, discrimination and exploitation (Code of conduct or multi-stakeholder codes in which the company participates, labor/human rights policies, collective bargaining agreements, framework agreements and others).	1		The policy should: • be approved at the responsibility should • be informed by relevant appropriate stake • stipulate the entire conduct of employ operations, produc • be reflected in op throughout the ent • be reviewed and knowledge about r		
1.2 Standards on Child Labor and Forced Labor	Internal Policy	Company	Is the policy publicly available to all employees, business partners and other relevant parties?.	The policy is accessible via different channels, such web-page, brochures or posters at the facilities	1		It is recommended partners and get th		
1.3 Standards on Child Labor and Forced Labor	Child Labor	Company	Does the policy address child labor and its prohibition?	The policy contains a definition of child labor that is in full agreement with the international standards and voluntary code provisions which the company has signed. It further prohibits to tolerate any form of child labor and establishes a company wide commitment in this respect.	1		For purposes of the Children under 18 y that may harm their heavy loads or wor night, or with dang any form of abuse labor and in any cit Children under 15 y has set the minimum age of 13-14 years harmful to their hea schooling or trainin 14 hours a week. In		
1.4 Standards on Child Labor and Forced Labor	Child Labor	Company	Does the policy address family work?	The policy provides a definition of family related work and describes limitations of its use.	1		Children aged und may help on their f conditions are out • children may only in a way that enabl • this work should n • they must be guid tasks - by a family (*) A family smallho structurally depen logic of both the IL		

Illustration 3 - Open Answer Tracking

## 7. Management Level Result

The last two pages of the self-assessment show the results. The first results page shows the achievements of the company using bar charts against the baselines of basic compliance, advance compliance and best practice. Companies that behave in accord with the USDA Guidelines should operate at 100% of the basic compliance level.

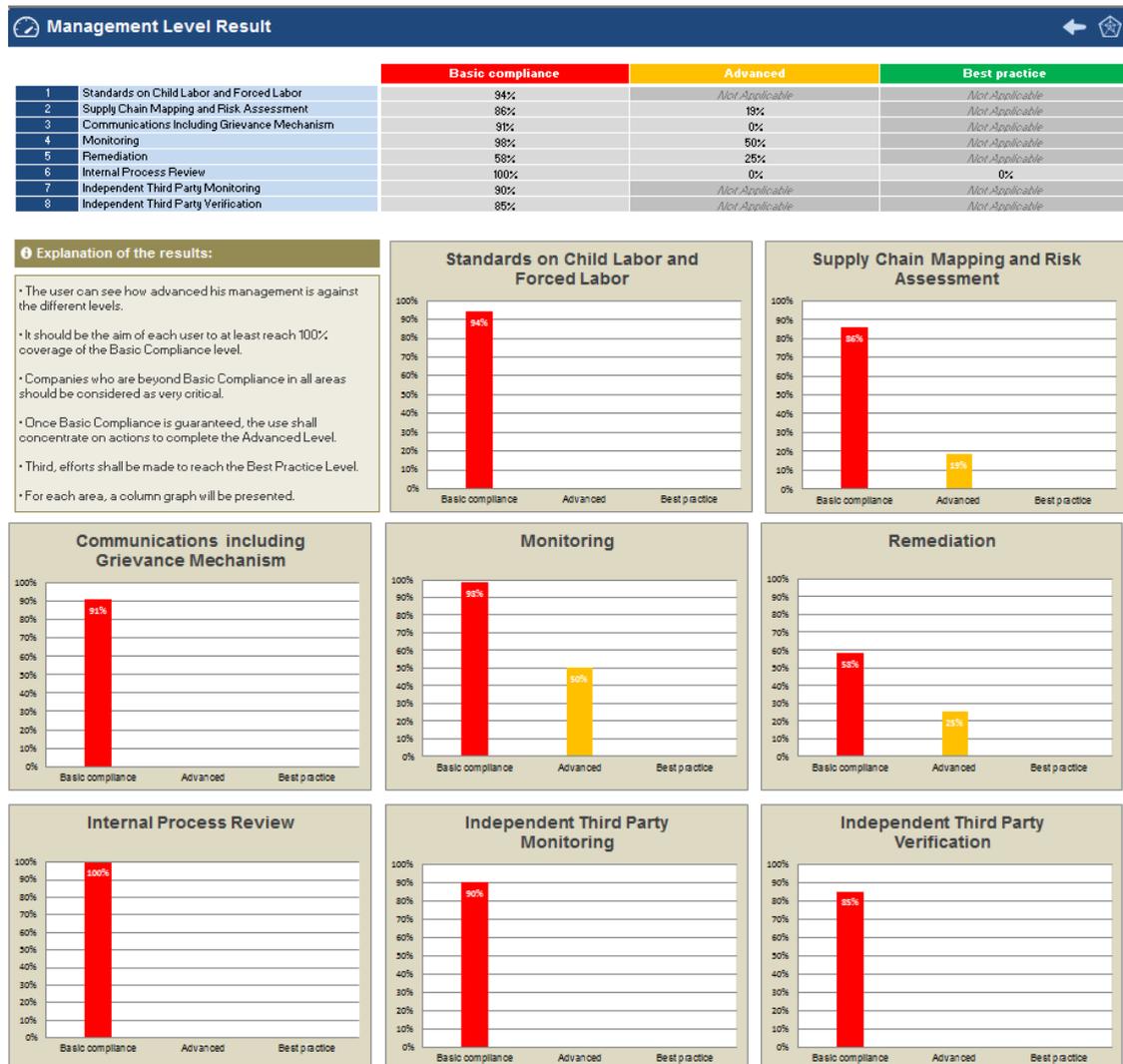


Illustration 4 - Management Level Results (Example)

## 8. Compliance Level Result

Compliance level results are presented as a radar graph. Through this graph, users can identify their main areas of gaps and observe their evolution from year to year, as the results of self-assessment applications for previous years can be included. The red area in the radar graph indicates Basic Compliance, a level that companies should be able to achieve with respect to all topics. Over time, companies who are taking positive steps should be able to improve their performance gradually.

Compliance Level Result		
	Scoring 2017	Scoring 2018
1 Standards on Child Labor and Forced Labor	30%	47%
2 Supply Chain Mapping and Risk Assessment	20%	43%
3 Communications Including Grievance Mechanism	15%	45%
4 Monitoring	20%	49%
5 Remediation	27%	29%
6 Internal Process Review	32%	50%
7 Independent Third Party Monitoring	45%	45%
8 Independent Third Party Verification	10%	43%

**Explanation of the result:**

- The general result will allow the user to detect where the areas which major gaps are.
- It will also allow to trace the progress over time as we can show the results of earlier applications.
- In this analysis *Basic Compliance* has been set as the minimum requirement level.
- Performance below 100% in *Basic Compliance* will result below 50% or the "Non-Compliance Zone".
- The result will be between 0% and 49%, depending on the performance in *Basic Compliance*.
- Results under this threshold should be considered critical and need corrective actions.
- If 100% of *Basic Compliance* has been reached, the result will be between 50% and 100% depending on the result in *the Advanced* and *Best Practice Level*.
- For Monitoring or Verification; either one of them needs to be 100% in *Basic Compliance*.

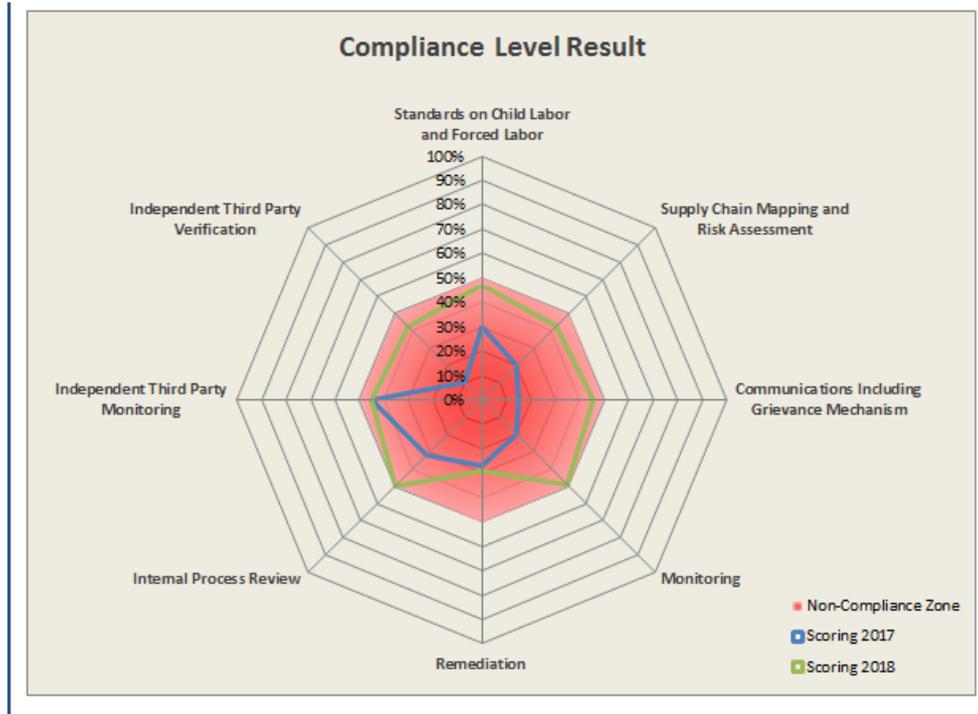


Illustration 5 - Compliance Level Result (Example)