

# COFFEE Project

Cooperation On Fair, Free, Equitable Employment

## Guidance on Independent Auditing of Coffee Farms

TOOL 25 OF 28

Verité  
Fair Labor. Worldwide.



## About Our Funding

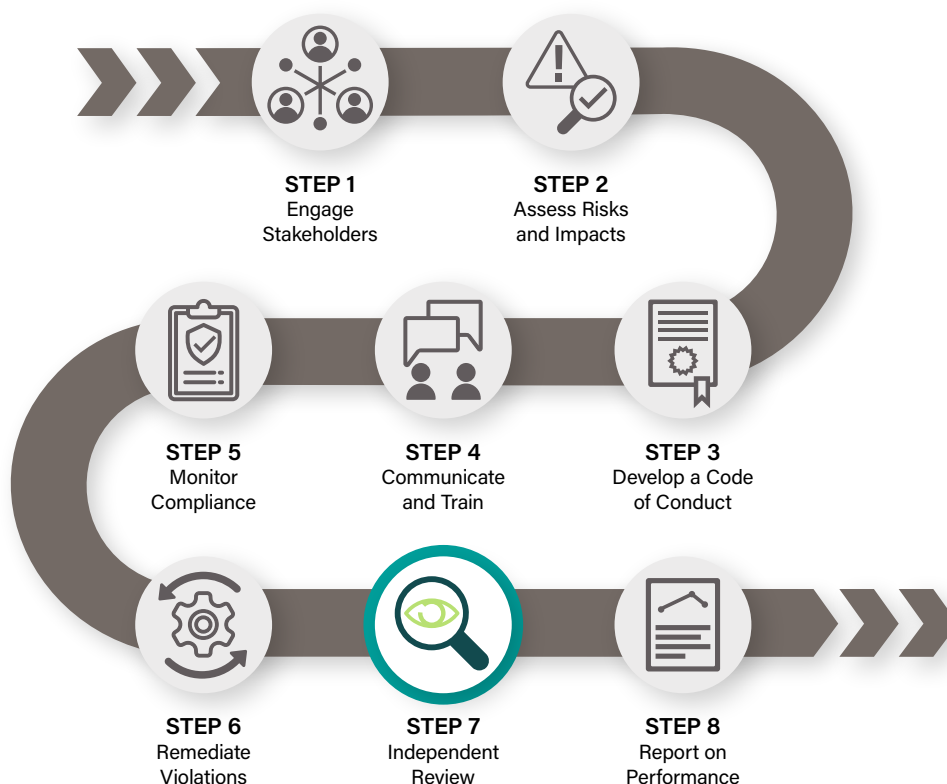
A solid red vertical line.

Funding is provided by the United States Department of Labor under cooperative agreement number IL-31476. This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the United States Government. 100% of the total costs of the project is financed with federal funds, for a total of \$2,500,000.

# About the COFFEE Toolkit

This tool is one of 28 tools and 14 online training modules comprising the [COFFEE Toolkit](#), which was developed as part of Verité’s Cooperation on Fair, Free, Equitable Employment (COFFEE) Project through generous funding from the US Department of Labor’s Bureau of International Labor Affairs (USDOL-ILAB). The purpose of the COFFEE Toolkit is to promote coffee retailer, roaster, trader, cooperative, and farm adoption of socially sustainable sourcing and farming practices in order to promote improved working conditions for farmworkers in the coffee sector.

The COFFEE Toolkit was developed in alignment with USDOL’s [Comply Chain](#) model, with at least one tool created for each of the eight steps of Comply Chain (see graphic below). Many of the tools are derived from tools created for the [Responsible Sourcing Tool](#), developed by Verité with funding from the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons (J/TIP). The tools can be used á la carte, but it is important that companies have systems and tools in place for each step of Comply Chain.



# Why Audit Coffee Farms?

---

Of all the workplaces in the coffee supply chain, coffee farms are one of, if not the, riskiest for workers. Coffee farmworkers face serious risks, including forced labor and child labor. Monitoring is necessary to detect risks of labor abuse, so that they can be mitigated and prevented, as well as to detect actual cases, so that they can be remediated.

Coffee farms are challenging to audit. For example, they are often located in remote rural areas with poor road access, and most work is temporary and seasonal, so it can be difficult to schedule visits at times when vulnerable workers are on site for interviews. Given the challenges, it is critical that auditors, agricultural technicians, and others who visit coffee farms are able to detect risks and cases of labor abuse, and know how to respond appropriately.

## About This Tool

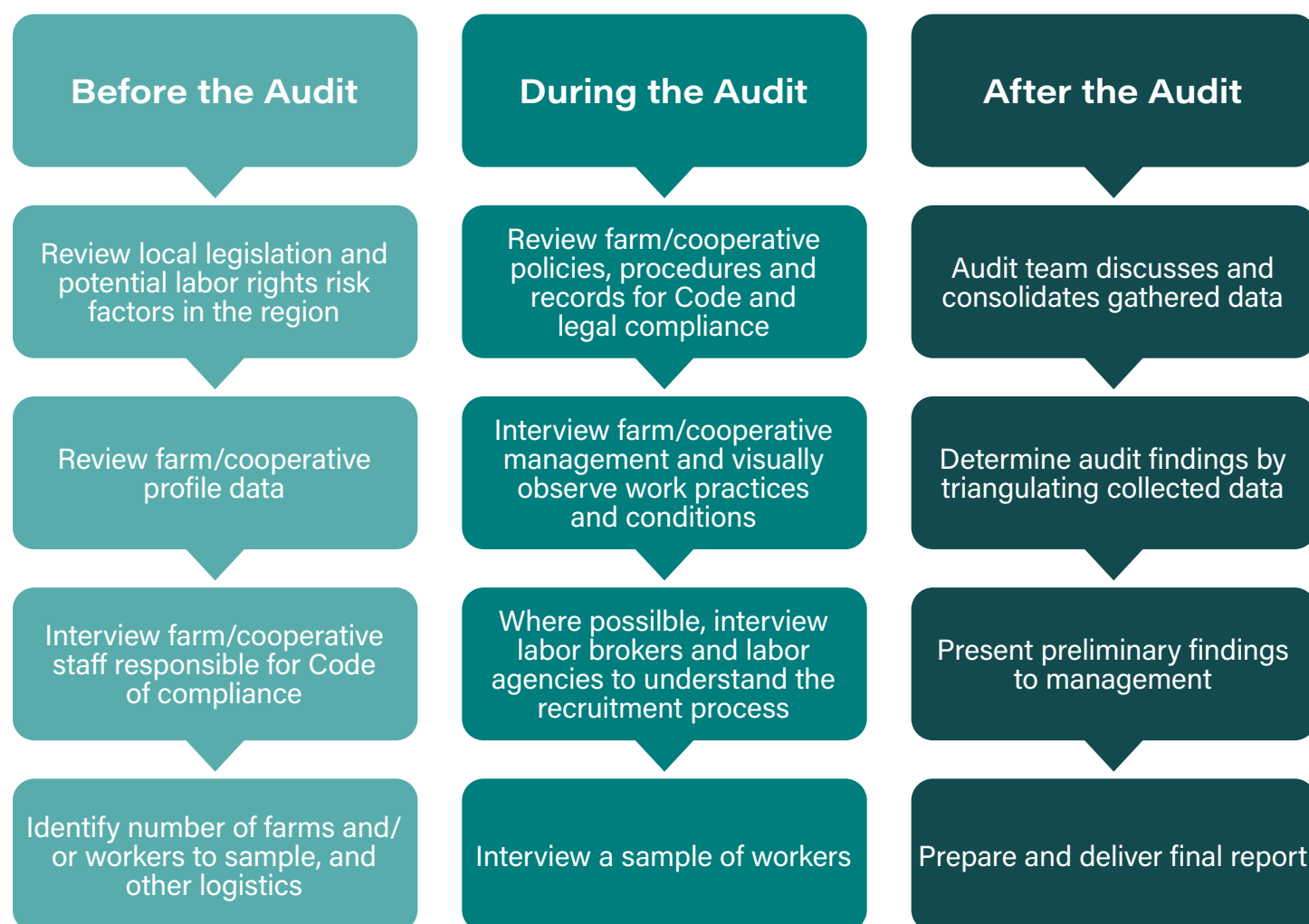
The **purpose** of this guide is to help users plan and implement an effective audit, or other type of monitoring visit, to a coffee farm. It covers the various steps in the auditing process, with a particular focus on worker interviews, triangulating information, and how to respond if labor abuses are found. This tool should be used in tandem with [Tool 26: Worker Interview Questions](#) and [Tool 27: Labor Broker Interview Questions](#).

The main **audience** for this guide is auditors, as well as others who regularly visit farms for technical assistance or monitoring purposes. Auditors can include internal company personnel and representatives of certification organizations or independent third-party auditing firms. This guide can also be useful for companies seeking to design or improve the assurance aspects of their sustainable sourcing programs.

# The Auditing Process

The primary objective of coffee farm auditing is to assess farms' compliance with relevant legislation and standards, such as a company code of conduct or a certification standard. In the coffee sector, most company codes and certification standards cover forced labor, child labor, and other serious labor rights issues, so any monitoring visit should include a focus on identifying risks and potential or actual cases of these abuses. **Figure 1** presents an overview of a typical auditing/monitoring process.

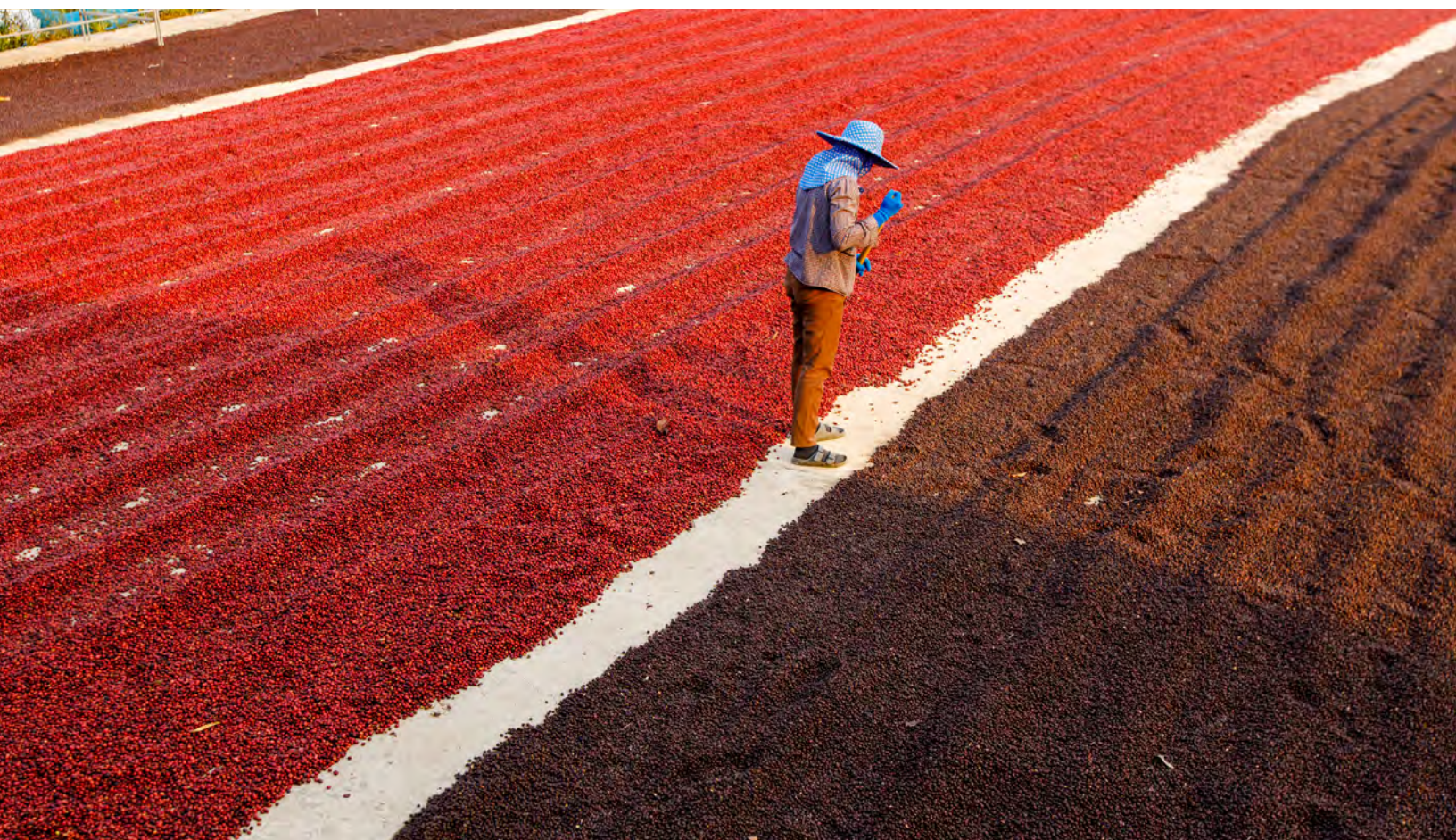
**Figure 1. Overview of the Auditing Process**





The above steps can be adapted to different contexts; for example, the auditor is more likely to be able to locate and interview labor brokers on a large coffee estate than on smallholder family farms.

The remainder of this guide expands on selected key points in the audit process.



## Before the Audit

---

The pre-audit phase usually begins with a review of applicable legislation and risk factors based on geographic context, worker demographics, and local production practices. Country-based risk factors can be assessed using [Tool 10: Risk Evaluation for Action in the Coffee Trade \(RE-ACT\) Dashboard](#). Additional risk factors are shown below.

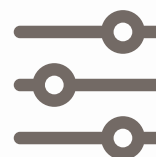
### The Pre-Audit Phase



Risk factors related  
to geography



Risk factors  
related to worker  
demographics



Risk factors related  
to types of work

## Risk Factors Related to Geography

Certain geographic factors contribute to increased labor risk. If these factors are present, the auditor should tailor audit timing, document review, interview questions, and other decisions accordingly.

### **Isolated Areas**

Being in an isolated area can increase the chance that a worker will be unable to leave or seek help if working or living conditions are undesirable or worse than promised. Workers in isolated areas may also be more dependent on their employers for needs like food, housing, and access to healthcare. Children in rural, isolated areas often have less access to schools and other childcare options; the school may be farther away from home, or transportation options may be limited. This increases child labor risk.

### **Areas Affected by Environmental Degradation**

Deforestation, recurring drought, or crop diseases (such as coffee rust) can also lead to an increased risk of labor exploitation, due to an association with pervasive poverty, forced migration, and food insecurity among local populations. Labor risks caused by such environmental factors will likely increase over time as a result of ongoing climate change.

### **Areas of Conflict, Violence, Crime, and Insecurity**

Verité research has found increased risk of labor exploitation in areas affected by conflict, crime, violence, and/or insecurity. Workers who work on farms in areas with high levels of crime and conflict may be much less likely to leave their jobs without their employers' permission, especially when combined with elevated rates of impunity. Finally, in violent areas, workers may be hesitant to venture off coffee farms due to fear of being victimized. Workers who live in such areas are at a greater risk of displacement, and if they are forced to migrate, they become highly vulnerable to labor exploitation due to their desperation for income and lack of social networks.





## Risk Factors Related to Worker Demographics

If the audited farm(s) rely on any of the following types of workers, they may be in a position of vulnerability and should be well represented in the interview sample.

### Female Workers

Women are often paid lower wages than men on coffee farms. Women are more often subject to discrimination and harassment in the workplace than men, and often do not feel comfortable resisting or advocating for themselves. Women's labor in some contexts may be "invisibilized," such as when they contribute to their spouse's production quotas but are not paid directly for their production.

### Young Workers

Children and adolescents are physically smaller and more vulnerable to threats to their health and safety, and due to their early stage of development and life experience, it can be difficult for them to weigh risks or advocate for themselves. They may also have difficulty evaluating promises made by labor brokers or employers, increasing the risk of exploitation in recruitment or employment practices.

### Impoverished Workers

People in situations of poverty generally have fewer employment and education options and may take risks that increase their vulnerability. For example, impoverished workers are more likely to pay recruitment fees to obtain jobs on coffee farms or to purchase goods or services on credit, increasing their risk of becoming trapped in debt bondage.

### Migrant Workers

Migrant workers—whether domestic or transnational—often have few employment options in their places of origin and are more likely to accept exploitative situations due to the lack of alternative options. Migrants are also more likely to use labor brokers or pay fees/other expenses to secure employment on farms. Migration of entire families to coffee farms can also increase the risk of child labor and its worst forms.

### Workers Recruited by a Labor Broker or Other Recruiter

The use of labor brokers to recruit workers, particularly when those brokers also manage and supervise work on the farms, significantly raises risk. Verité research has found many exploitative practices among labor brokers, including deception around the nature and/or conditions of the

job, charging workers illegal fees and costs, taking unauthorized deductions from workers' pay, document retention, harassment and abuse, and blacklisting.

### **Workers from Marginalized Social Groups**

Vulnerable populations and marginalized social groups – such as indigenous workers and other racial or ethnic minorities, undocumented immigrants, refugees and asylum seekers, and LGBTQ individuals – may experience increased vulnerability due to discrimination, harassment and abuse, and a lack of social capital with which to advocate for their rights.

## **Risk Factors Related to Types of Work**

Certain types of work on coffee farms are associated with an increased risk of labor exploitation. Workers performing these tasks should be well represented in the interview sample.

### **Dangerous or Difficult Tasks**

Some tasks on coffee farms are unpleasant, dangerous, or otherwise difficult – such as working at heights or in extreme temperatures, carrying heavy coffee sacks, or applying pesticides or herbicides. It is important to confirm that workers performing these tasks accepted them voluntarily, have the ability to remove themselves from dangerous tasks without the threat of reprisal, and have access to health and safety protections.

### **Seasonal Work**

The time-sensitive nature of coffee harvesting leads to a temporary surge in demand for workers on farms for the harvest. This spike in demand drives the use of migrant workers, often through labor brokers. Audits should be carefully timed to enable auditors to interview seasonal workers and labor brokers.

### **Piece-Rate Pay and/or Production Quotas**

Verité research has found that many coffee farms pay workers, especially coffee harvesters, using a piece-rate payment system, usually based on the weight or volume of coffee cherries harvested. Farms may also implement production quotas, sometimes accompanied by penalties for failure to meet these targets. Piece-rate pay and production quotas are associated with an increased risk of child labor, subminimum wages, excessive unpaid overtime, and unequal remuneration between men and women.

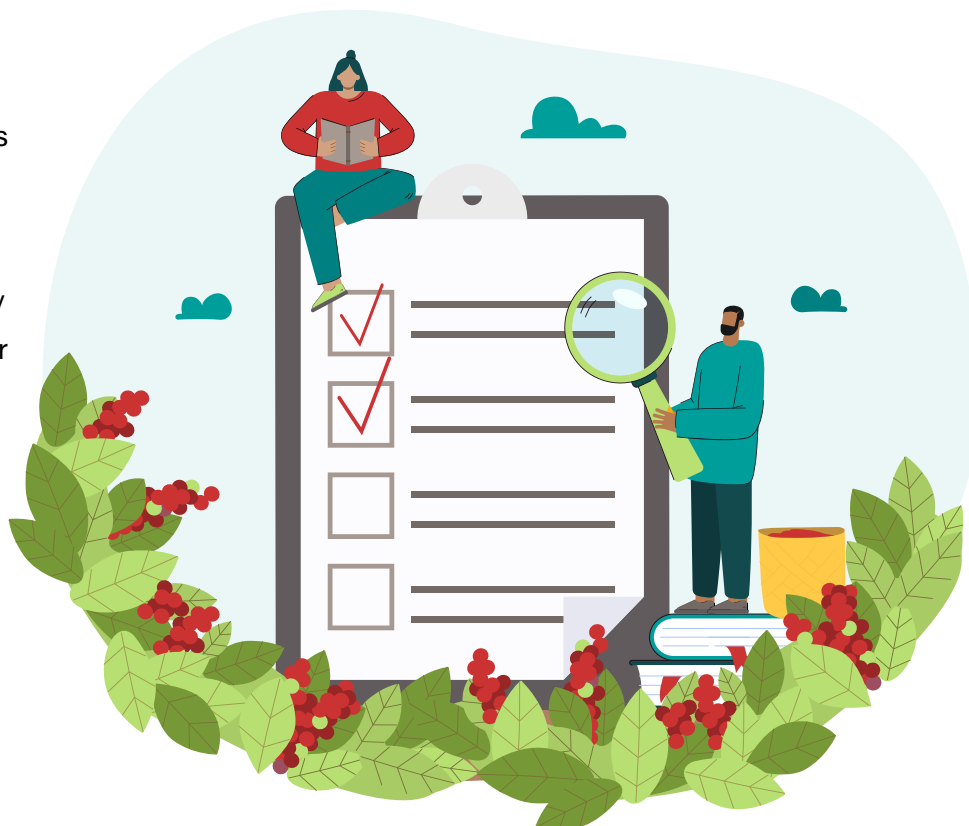
## During the Audit

---

Worksite inspections, document review, and interviews with workers, labor brokers, and other actors are key activities that should take place during an audit.

### Worksite Inspections and Document Review

Physical inspection of worksites (including sanitary facilities and worker housing, if provided) and document review are fundamental components of an audit. At a minimum, document review should include review of employer-employee work contracts, employer records of payment to employees, and employee pay stubs. If labor brokers are used to recruit or supervise workers, the auditor should seek to review a sample of relevant documents, such as labor broker registration documents, documentation of labor broker policies or processes, written contracts between the farm and labor broker, written contracts between the labor broker and other brokers/agents, and/or written contracts between the labor broker and workers.



*Pre-audit activities include performing worksite inspections, document review, and interviews with workers, labor brokers, and other actors.*



## Worker Interviews

If the audit's ultimate goal is to identify labor risks and impacts so that they can be mitigated and remediated, no step in the process is more important than talking to workers. Workers are the true experts on labor conditions on coffee farms, and can share essential information on their own experiences and challenges.

The choice of how many and which workers to interview is a key one. Worker sampling should be driven by the demographic risk factors noted above, and the number of worker interviews should depend on how serious and numerous the risks seem to be in the farm and landscape.

Box 1 presents some key considerations related to obtaining proper consent and handling worker interviews with sensitivity.



See [Tool 26: Worker Interview Questions](#) for questions to ask on key labor rights risks.

## BOX 1 | BEST PRACTICES

### Worker Interviews: Sensitivity and Consent

Interviewing workers puts them in a potentially vulnerable situation, as they could face retaliation for openly sharing their experiences. Workers from marginalized groups, such as women, people who identify as LGBTQ+, migrants, and racial and ethnic minorities are often extremely cautious about speaking about sensitive issues, especially to an outsider. This is especially true in situations where there are risks of forced labor or other types of exploitation, coercion, reprisals, or abuse. Therefore, auditors must always put workers' safety first and avoid endangering workers in any way.

It cannot be overstated that interviewers should be properly trained on engaging with workers in a sensitive and conscientious manner and should ideally be members of the vulnerable groups that they are interviewing (e.g. women, ethnic minorities, etc.). Every effort should be made to utilize female auditors when female workers are present, as women may be more likely to discuss sensitive topics, such as sexual abuse or harassment, with another woman. In order to increase the likelihood of gaining the trust of migrant workers, auditors should seek to ensure worker interviewers have appropriate language and cultural skills based on the demographics of workers present.

Workers should only be interviewed if the following criteria are met:

The interviewer is:

- trained on how to interview workers effectively and safely; and
- proficient in languages spoken by workers.

The worker:

- is in a safe and private location;
- gives free, prior, informed consent to participate;
- does not lose earnings due to participation in the interview; and
- is clearly informed that they can withdraw from the interview and/or decline to answer questions at any point.

If workers appear to be coached, intimidated, or otherwise concerned about retaliation, the auditor should immediately stop any attempts to reach out to workers and privately take note of workers' reactions. Furthermore, all names and personally identifiable information should be removed from all reports to protect worker confidentiality and reduce the risk of reprisal.

If the worker is or may be a child, the interviewer should follow additional [protocols for interviewing children](#).

## Labor Broker Interviews

If labor brokers are involved in recruiting or managing workers, the auditor should seek to interview them if at all possible.



See [Tool 27: Labor Broker Interview Questions](#) for questions to ask on key labor rights risks.

## Other Interviews

Depending on the risk factors identified, the auditor may wish to interview community members, community organizations, families, school officials, public officials or others. The auditor may also ask to inspect worker housing or sanitary facilities.

## Auditable Standards and Red Flags

Detecting labor rights violations in audits is rarely straightforward. Violations are often hidden, without physical evidence, and victims can be reticent to speak up for various reasons. Tables 1 through 10 lay out the standards that auditors should look for and red flags that, while not always violations of labor law or standards in and of themselves, should cause auditors to probe deeper into the issues.





TABLE 1  
**Forced Labor**

**Auditors should confirm that...**

**Red flags**

**DEBT BONDAGE**

Workers are not forced to work to repay a debt, whether related to recruitment fees, salary advances, or other types of debts.

If workers purchase goods on credit, they are provided with written records of the amount owed, and the cost of goods purchased are not deducted directly from workers' salaries or wages.

Interest rates and repayment terms for advances, loans, and credit purchases do not exceed those available from local banks and:

- A worker's total outstanding balance must not exceed 50 percent of one-month's base wages.
- Monthly debt payments must not exceed ten percent of one-month's base wages.
- Loan terms must not exceed six months or extend beyond the duration of a worker's employment contract, whichever is shortest.

Loan advances and credit accounts can only be provided with the full, prior, free, informed consent of workers.

Workers are not prohibited from quitting their jobs, punished or threatened with punishment, blacklisted, or reported to authorities for failing to pay back a debt.

- 🚩 No documentation is available in relation to loans or advances.
- 🚩 Employer records of loans/advances do not match worker interviews.
- 🚩 Workers' understanding of loans/advances/credit differs from that of the employer/broker.
- 🚩 Workers seem ill-informed about the terms or the full amount of loans.
- 🚩 Deductions for loan payments are taken from workers' wages.
- 🚩 No written records of goods or services purchased on credit.

Auditors should confirm that...	Red flags
<p><b>RECRUITMENT FEES AND COSTS</b></p> <p>Workers do not pay any recruitment fees or costs, either directly or indirectly (e.g. fees charged by labor brokers, deductions from workers' wages, or reduced wages).</p> <p>Workers do not pay for training that is required by the employer.</p> <p>Workers do not pay for transportation from workers' communities or countries of origin to the farm, for return transportation, or for transportation between worker housing and the worksite.</p> <p>Labor brokers involved in the recruitment, selection, hiring, and management of workers do not charge workers any recruitment fees or costs.</p> <p>The no-fees policy is clearly communicated to workers in a language they understand at the beginning of the recruitment process.</p>	<ul style="list-style-type: none"> <li>Review of employer records or employer/ labor broker interviews do not match worker statements.</li> <li>Employers/labor brokers do not seem familiar with legal requirements or code of conduct requirements related to recruitment fees.</li> <li>No written commitment by the employer or labor recruiter to adhere to the "employer-pays" recruitment fee policy.</li> <li>Workers report unexplained deductions from their pay that may be related to recruitment.</li> </ul> <div data-bbox="841 928 1572 1213"> <p><b>What Are Recruitment Fees?</b></p> <p>Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing, or location of their imposition or collection.</p> </div>
<p><b>CONFISCATION OF PERSONAL IDENTITY DOCUMENTS AND/OR PROPERTY</b></p> <p>Workers who live on site have a secure place to store their identification documents and other valuables, including cellular phones, and have access to them at all times, including while working.</p> <p>Employers/labor brokers do not confiscate, destroy, retain, or deny workers access to their personal identification documents, documents needed to claim benefits, work permits, travel documents, or cellular phones.</p>	<ul style="list-style-type: none"> <li>Workers do not seem to have mobile phones.</li> <li>Employers/ brokers routinely confiscate workers' documents or property 'for safekeeping.'</li> <li>Workers are not informed about their right to maintain their own documents.</li> <li>Workers are not sure how to access their documents or property.</li> </ul>

Auditors should confirm that...	Red flags
<p><b>DEPOSITS AND DEDUCTIONS</b></p> <p>Workers are not required to make monetary deposits, pay bonds, or have wages withheld in exchange for an offer of employment or to maintain employment.</p> <p>Deposit schemes, forced savings, or mandatory deductions from workers' wages to buy goods or services are prohibited.</p>	<ul style="list-style-type: none"> <li>✚ No written records of deposits, bonds, or deductions.</li> <li>✚ Review of employer records of deposits, bonds, or deductions does not match worker interviews.</li> <li>✚ Workers do not seem to understand the deductions from their pay, or their understanding of deposits, bonds, or deductions differs from that of the employer/broker.</li> </ul>
<p><b>FREEDOM OF MOVEMENT AND PERSONAL FREEDOM</b></p> <p>Workers have freedom of movement during recruitment, transportation, and employment. Workers are not subjected to unwarranted surveillance at the worksite or in worker housing.</p> <p>Workers are not required to live in employer-provided or arranged housing unless required by law. Neither the employer, labor brokers, or security personnel physically confine workers at the worksite or housing, or require workers to obtain permission to leave these areas.</p> <p>Outside of working hours, neither the employer nor labor broker controls the movement of workers, nor do they restrict their activities or relationships during their free time, including interactions with labor unions, government agencies, or civil society organizations.</p> <p>Workers are not subject to any threats or physical violence to limit these freedoms.</p>	<ul style="list-style-type: none"> <li>✚ Curfews at employer-provided housing.</li> <li>✚ Surveillance cameras in employer-provided housing.</li> <li>✚ Presence of armed security guards or high numbers of security personnel.</li> </ul>





TABLE 2  
**Contracts**

Auditors should confirm that...	Red flags
<p>Workers are provided written employment contracts in a language they understand (including indigenous languages that may be spoken in certain Latin American countries).</p> <p>Workers and management have both signed the same contract and both have a countersigned copy.</p> <p>Internal and international migrant workers should receive a copy of their employment contracts in their native language at least five days before departing their home communities.</p> <p>Workers who are not able to understand their written contracts have been provided detailed verbal descriptions of their contracts in languages they understand.</p> <p>Verbal agreements must be documented for auditability, such as in the employer's files.</p> <p>The worker's employment experience on the farm is consistent with those in the contract.</p> <p>Workers have the right to voluntarily terminate their employment contracts without penalty at any time, consistent with applicable laws.</p> <p>All workers, including family members who help with production, have their own contracts.</p>	<ul style="list-style-type: none"> <li>Employers are not able to provide specific contracts when requested.</li> <li>There are inconsistencies between contracts provided by workers and employers.</li> <li>Contracts omit key information (see box)</li> <li>No clear procedures for conducting employment orientation for new hires.</li> <li>Orientations are conducted by labor brokers, which may result in inconsistent messaging and insufficient information.</li> <li>Trainings are conducted in a language workers do not fully understand.</li> </ul>

## BOX 2 | BEST PRACTICES

# Worker Contracts

---

Workers' contracts should include, at a minimum, the following information:

- Job position and activities performed in the role
- Location of the work performed, including the country and city
- Employer name and address
- Worker name and identifying details, i.e., address, passport number
- Contract length with start and end dates
- Provisions for contract renewal
- Conditions for early contract termination by the worker with and without reasonable notice, specifying circumstances in which the employer will pay for return transportation
- Conditions for contract termination by the employer
- Probationary period, if any, including the length of probation, provision of wages and any benefits during probation, and conditions for successful completion of probation
- Wage rates for regular working hours, as well as the minimum and maximum hours that may be worked per day and/or per week
- Wage rates for overtime hours, including a definition of what constitutes overtime work
- Pay practices, including frequency of payment, payment method, and pay slips
- Deductions from the worker's salary, including any for meals, accommodation, transit, healthcare, and insurance
- Benefits and leave provided, including provision of healthcare, sick leave, annual leave, emergency home leave, and holiday leave
- Provision of transportation at the end of the contract; for example, the party responsible for arranging and paying for return transportation to the worker's country



TABLE 3

## Wages and Hours of Work

### Auditors should confirm that...

### Red flags

#### WAGES

Workers who are paid piece rates are not paid less than the legally established minimum wage.

All workers, including family members who help with production, are paid directly for their work and may not be paid less than the minimum wage for the hours worked. All working people retain full and complete control over their earnings.

Payments are made directly to workers in regular intervals (as established by law) and never less often than bimonthly.

Payment of wages — in whole or in part — is not delayed, deferred, or withheld (including until the end of the harvest season or the end of a worker's contract).

If a worker chooses to leave their employment at any time, the worker is immediately provided with all outstanding wages due to them.

Payment in the form of vouchers, coupons, or promissory notes is prohibited.

Workers who are paid in cash have access to a safe place to store their cash to which they have unrestricted access.

Workers who are paid by direct deposit must have access to their debit cards, as well as transportation to withdraw their money.

Only deductions authorized by applicable laws are allowed and, if made, are only taken with the full consent and understanding of workers. Information is provided to workers at the time of hiring about all legal deductions.

Workers are provided with pay slips that itemize earnings, hours worked, and deductions. When necessary, verbal explanations of earnings and deductions are provided in a language workers can understand.

- ✘ No pay slips are provided or pay slips do not contain critical information about how wages are calculated, such as rate of pay per unit, hours worked, production, and/or deductions
- ✘ Pay slips are provided but are in a language the workers do not understand.
- ✘ Workers do not seem to understand earnings calculations.
- ✘ Workers feel that piece rate/ volume payment is not being calculated fairly.
- ✘ Workers have not signed logs to acknowledge receipt of earnings.
- ✘ Delayed payment of wages.
- ✘ Workers (or their families) are provided with cash advances and/ or in-kind payments.
- ✘ Workers do not have easy access to bank accounts used to receive payments.
- ✘ There are not enough officially registered workers to meet production needs (some may be working off-books.)

Auditors should confirm that...	Red flags
<p><b>HOURS OF WORK</b></p> <p>Workers who are paid a piece rate never have to work in excess of legal working hours in order to earn the minimum wage.</p> <p>All overtime hours are paid at the legally established premium rates, regardless of whether workers are paid by piece, task, hour, or month.</p> <p>Overtime is always voluntary. No one is forced to work overtime under the threat of any penalty (such as denying the opportunity to work overtime in the future, dismissal, or reporting workers to the authorities). No person is forced to work overtime as a disciplinary measure or for not meeting production quotas.</p> <p>Penalties for failing to meet production targets are prohibited.</p> <p>The employer clearly defines and communicates its working hours policies and procedures to all workers.</p>	<ul style="list-style-type: none"> <li>Workers report symptoms of fatigue (e.g., exhaustion, inability to communicate clearly, increased frustration, inability to focus on tasks, cutting corners to finish tasks more quickly, taking unusual risks, slow response times, not noticing impending physical risks, making unusual mistakes on routine tasks).</li> <li>Employer records of working hours are inconsistent with hours reported by workers.</li> <li>Workers are unable to meet quotas without regularly working overtime.</li> <li>Workers are unable to earn the minimum wage under piece-rate schemes without working overtime.</li> </ul>





TABLE 4  
Child Labor

Auditors should confirm that...	Red flags
<p>No worker under the age of 18 is performing tasks that are hazardous to their physical, emotional, intellectual, or moral development. (See <a href="#">Tool 1: Definitions and Concepts</a> for the full definitions of prohibited child labor and permissible child work)</p> <p>Farm owner/management is fully aware of minimum age requirements.</p> <p>The farm has an age verification system in place for all workers, including those hired directly and those hired through labor brokers.</p> <p>The company clearly defines and communicates its child labor policies and procedures to all personnel.</p> <p>If children are living on the farm, they are attending school (if below the age for compulsory schooling)</p>	<ul style="list-style-type: none"> <li>Children's hands seem to be affected with skin rashes.</li> <li>The farm is unable to produce proof of age verification documentation.</li> <li>Young workers claim to be older than they appear.</li> <li>School administration/teacher interviews indicate low rates of enrollment and attendance during the harvest season.</li> </ul>





TABLE 5

## Discrimination and Equality

### Auditors should confirm that...

All working people, regardless of their nationality or legal status, are treated fairly and equitably.

Migrants enjoy working conditions no less favorable than those available to nationals of the country.

Workers and job applicants are not subjected to medical examinations or physical examinations that may be used in a discriminatory manner (including pregnancy tests). Medical examinations and testing are only administered where required by law or to support objective job performance requirements.

All women engaged in coffee production and auxiliary tasks (such as cooking, cleaning, and childcare), including those who are employed part-time, are directly hired and paid by farms, and are paid the same rates as men who perform tasks of a similar nature.

The company clearly defines and communicates its Discrimination and Equality policies and procedures to all personnel.

Workers are provided reasonable accommodation for religious practices.

### Red flags

- 🚩 Women or people from other vulnerable groups seem more guarded or are reluctant to participate in interviews.
- 🚩 Employers do not seem to understand the concept of discrimination.
- 🚩 Workers do not seem to understand the concept of discrimination.



TABLE 6

## Harassment and Abuse

Auditors should confirm that...	Red flags
<p>The use or threat of physical or sexual violence, harassment, and intimidation against a worker, their family, or associates is strictly prohibited.</p> <p>Workers and managers receive anti-harassment training.</p> <p>Anyone found to engage in harassment is subjected to appropriate disciplinary measures.</p> <p>Disciplinary measures do not include any inhumane treatment.</p> <p>Fines, deductions from workers' wages, reductions of benefits, or compulsory work may not be used as disciplinary measures.</p> <p>The employer clearly defines and communicates its disciplinary measures and procedures to all workers.</p>	<ul style="list-style-type: none"><li>Women or people from other vulnerable groups seem more guarded or are reluctant to participate in interviews.</li><li>Employers do not seem to understand the concept of harassment.</li><li>Workers do not seem to understand the concept of harassment.</li></ul>



TABLE 7  
Freedom of Association  
and Collective Bargaining

Auditors should confirm that...	Red flags
<p>Workers are permitted to form and join organizations of their own choosing without prior authorization.</p> <p>Worker organizations are allowed to draw up their own rules and constitutions, elect their own representatives, and organize their own affairs without any employer intervention.</p> <p>Workers are compensated at their regular rate during the time they carry out their official duties as worker representatives.</p> <p>Workers do not face any type of discrimination or reprisal for forming or participating in workers' organizations or for engaging in collective bargaining or strikes.</p> <p>Employers engage in good faith collective bargaining with workers' organizations representing workers employed on their farms.</p> <p>Workers and their representatives are able to communicate openly with management regarding working conditions and management practices without fear of discrimination, retaliation, intimidation, harassment, or violence.</p> <p>The company clearly defines and communicates to all workers its Freedom of Association policies and procedures.</p>	<ul style="list-style-type: none"><li>Management attempts to control what workers' organizations can say to auditors.</li><li>There seem to be rival workers' organizations at the farm and management seems to have a preference for one workers' organization over another.</li><li>Workers do not seem to want to discuss involvement with workers' organizations.</li></ul>





TABLE 8

## Grievance Mechanisms

Auditors should confirm that...	Red flags
<p>Farms should set up grievance mechanisms that are easy to use and understand and are appropriate for workers' level of literacy, language fluency, and technology access.</p> <p>The mechanism allows for anonymous complaints, if the complainant chooses.</p> <p>The mechanism is available in workers' native languages, including indigenous languages.</p> <p>The mechanism allows workers to confidentially report grievances to individuals other than their supervisors or labor brokers.</p> <p>The mechanism includes a procedure for management to follow-up on reported grievances that is communicated to workers, a system to remediate issues, and an appeals process in the case that workers are not satisfied with the resolution.</p> <p>Workers who report grievances are not subjected to any form of penalty, dismissal, discrimination, harassment, or reprisal.</p>	<ul style="list-style-type: none"> <li>✘ No documentation available related to the Grievance Mechanism.</li> <li>✘ Workers do not seem aware of the Grievance Mechanism.</li> <li>✘ Workers do not seem inclined to use the Grievance Mechanism.</li> <li>✘ Management does not demonstrate understanding of why some workers may prefer to submit complaints to people other than their supervisors/management.</li> <li>✘ The mechanism has one, or very few, channels for submission.</li> </ul>



TABLE 9  
Health & Safety

Auditors should confirm that...

Health and safety training is provided to all individuals prior to the start of working training specific to hazardous tasks assigned to workers.

Health and safety-related information is clearly posted in a place that is visible and accessible to workers.

Workplace accidents are prevented through the identification, evaluation, and prevention of workplace hazards.

Worker exposure to chemical, biological, and physical agents is routinely evaluated and controlled to prevent disease.

Workers are not exposed to pesticides, fungicides, or herbicides categorized as “extremely hazardous” (Class Ia) or “highly hazardous” (Class Ib) by the World Health Organization (WHO), including handling or applying these agrochemicals or working in areas in which they have been recently applied.

Suitable personal protective equipment (PPE) is provided to all workers free of charge.

Workers engaged in hazardous tasks are provided with the following task-appropriate PPE free of charge:

- respiratory protection: organic vapor respirators and/or dust masks for preparation and application of pesticides, herbicides, and other agrochemicals;
- hearing protection: earplugs/earmuffs for machinery operators on coffee farms and all workers in coffee processing plants;

Red flags

- ✘ Workers do not have knowledge of health and safety risks posed by regular work activities.
- ✘ Workers engaged in hazardous tasks have no knowledge of, or guidance on, how to mitigate risks.
- ✘ Workers cannot freely remove themselves from hazardous situations.
- ✘ Workers do not regularly use PPE.
- ✘ There are areas not labeled and there is no designated, safe storage area for chemicals.

Auditors should confirm that...	Red flags
<ul style="list-style-type: none"> <li>▪ eye and face protection: glasses/mesh face shields (machinery operators);</li> <li>▪ hand protection: leather gloves (machinery operators on coffee farms and all workers in coffee processing plants);</li> <li>▪ head protection: hard hats (machinery operators on coffee farms and all workers in coffee processing plants and warehouses);</li> <li>▪ protective clothing: cut-resistant aprons or chainsaw chaps (if possible, for machinery operators on coffee farms); and</li> <li>▪ safety footwear: steel-toed boots (for machinery operators on coffee farms).</li> </ul> <p>Workers are required to use PPE when carrying out hazardous activities, including when:</p> <ul style="list-style-type: none"> <li>▪ preparing and applying agrochemicals;</li> <li>▪ pruning and stumping (workers who operate machetes, chainsaws, scythes, and pruning shears);</li> <li>▪ weeding (chemical and mechanical);</li> <li>▪ processing (work with depulper motors and related machinery, particularly if equipment is not well-maintained and covered); and</li> <li>▪ working in warehouses (risks related to falling coffee sacks, working at heights, and agrochemicals)</li> </ul> <p>Workers are not fined or unfairly punished for failing to utilize PPE or for damaging or losing PPE.</p>	

Auditors should confirm that...	Red flags
<p>Appropriate first aid and subsequent medical treatment, including transport to medical facilities and coverage of medical expenses and medications, are provided to workers who suffer from workplace injuries or illnesses.</p> <p>Workers who have suffered workplace injuries or illnesses are provided with paid time off during the recovery period and are returned to their original job assignments upon return, or assigned to less strenuous but equally remunerated assignments if medically necessary.</p> <p>All workplace accidents, injuries, illnesses, and fatalities are reported to appropriate authorities.</p> <p>Workers are permitted to remove themselves from conditions that they deem hazardous without fear of reprisal.</p> <p>Emergency preparedness and response plans are established to address possible emergency situations.</p>	



Source: aFotostock/Adobe Stock



TABLE 9  
Health & Safety

Auditors should confirm that...

Employers that offer workers housing provide them with safe and hygienic housing conditions, in accordance with prevailing industry standards and legal requirements.

Each individual (including workers and their family members) is provided with at least 1.5 square meters of personal space.

Each worker is provided with their own bed. Beds are not assigned by shift.

Workers housed by their employers have access to toilets, showers, and kitchens equipped with running water and safe and hygienic conditions.

Workers are not charged for housing in violation of local laws or in excess of local equivalent rentals.

Employers proactively identify and address risks to workers' health and safety in housing units, including through maintenance, evacuation drills, and provision of fire alarms, fire extinguishers, and first aid kits.

In cases in which employers provide workers with food as a benefit of employment or in accordance with local law, they must provide an adequate amount of balanced food that meets workers' nutritional needs.

Red flags

- Recruiters require workers to stay in recruiter-controlled housing facilities or workers have no other alternatives.
- There are restrictions on guests or outsiders visiting worker housing.
- There are restrictions on workers' freedom of movement, such as curfews or prohibitions against leaving worker housing without permission.
- Gates to worker housing are locked.
- Security personnel are instructed to restrict workers from leaving or entering the housing.
- Workers complain about the food provided.





TABLE 10

## Housing and Living Conditions

### Auditors should confirm that...

Employers that offer workers housing provide them with safe and hygienic housing conditions, in accordance with prevailing industry standards and legal requirements.

Each individual (including workers and their family members) is provided with at least 1.5 square meters of personal space.

Each worker is provided with their own bed. Beds are not assigned by shift.

Workers housed by their employers have access to toilets, showers, and kitchens equipped with running water and safe and hygienic conditions.

Workers are not charged for housing in violation of local laws or in excess of local equivalent rentals.

Employers proactively identify and address risks to workers' health and safety in housing units, including through maintenance, evacuation drills, and provision of fire alarms, fire extinguishers, and first aid kits.

In cases in which employers provide workers with food as a benefit of employment or in accordance with local law, they must provide an adequate amount of balanced food that meets workers' nutritional needs.

### Red flags

- ✘ Recruiters require workers to stay in recruiter-controlled housing facilities or workers have no other alternatives.
- ✘ There are restrictions on guests or outsiders visiting worker housing.
- ✘ There are restrictions on workers' freedom of movement, such as curfews or prohibitions against leaving worker housing without permission.
- ✘ Gates to worker housing are locked.
- ✘ Security personnel are instructed to restrict workers from leaving or entering the housing.
- ✘ Workers complain about the food provided.

## After the Audit

---

### Triangulation

Once auditors/monitors have completed their site inspections, document review, and interviews with management/supervisors, workers, and others, as needed, it is key to triangulate information. This helps to examine whether different stakeholders' information lines up consistently and aids the auditor in obtaining a better and more complete perspective on any potential issues. If information is inconsistent, further document review, interviews, or other investigative steps may be needed.

### Risks and Violations

A **risk** is a situation in which some form of labor exploitation may be taking place, but the auditor cannot confirm or triangulate a claim by one of the parties. In such cases, it is still important to note risks identified in audit reports, but to provide a description of the limitations.

In other cases, a worker may be at risk of exploitation, but management is not in violation of any law or Code. For example, an auditor may see that workers are applying pesticides without PPE. However, the employer can demonstrate that workers have access to PPE and have been trained how to use it, because they keep a log of trainings and have a supply of PPE. The risk exists because the workers are not protected; however, it is not a violation because the employer is in compliance with its requirements. In this case, the monitor may want to ask workers why they don't use the PPE and explore ways to remedy the situation.



By contrast, often the auditor is able to confirm an actual **violation** of laws or **noncompliance** with the code of conduct. For example, auditors can use the ILO's forced labor indicators, shown in **Figure 2**, to determine whether there is a case of forced labor. If at least one of the indicators of "Menace of Penalty" and one indicator of "Involuntariness" exists, the situation can be considered forced labor, a serious violation of workers' labor rights.

**Figure 2. Forced Labor Determinations**

Involuntariness	Menace of Penalty
Threats or violence against workers or workers' families and relatives, or close associates	Situations in which the worker must perform a job of different nature from that specified during recruitment without a person's consent
Restrictions on workers' movement	Abusive requirements for overtime or on-call work that were not previously agreed with the employer
Debt bondage or manipulation of debt	Work in hazardous conditions to which the worker has not consented, with or without compensation or protective equipment
Withholding of wages or other promised benefits	Work with very low or no wages
Withholding of valuable documents (such as identity documents or residence permits)	In degrading living conditions imposed by the employer, broker, or other third-party
Abuse of workers' vulnerability through the denial of rights or privileges and/or threats of dismissal or deportation	Work for other employers than agreed
	Work for longer period of time than agreed
	Work with no or limited freedom to terminate work contract



## Auditor Response

If an auditor finds a violation of labor laws and/or applicable standards, the auditor should evaluate whether the affected person is in immediate peril, defined as an immediate threat to the person's health or safety, physical or psychological. If the situation is one of immediate peril, the auditor should immediately seek out someone in authority at the worksite, such as a crew leader, supervisor, or manager, to intervene and put a stop to the situation or practice. If the person is not in immediate peril, the auditor should note the violation and include it in the closing meeting and presentation of findings to management. Risks should also be reported to management, even if they do not reach the level of a violation.

Depending on client requirements, situations of immediate peril or "zero tolerance" situations often require auditors to immediately flag them for clients and/or other supply chain actors.



## Next Steps

In order to determine where to focus monitoring activities, companies can use [Tool 10: Risk Evaluation for Action in the Coffee Trade \(RE-ACT\) Dashboard](#).

