

FARM LABOR DUE DILIGENCE INITIATIVE

# First Mile Toolkit

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# Understanding Farm Labor Due Diligence in the First Mile

This **First Mile Toolkit** is a companion to **Verité’s Farm Labor Due Diligence (FLDD) Toolkit**. It provides guidance on human rights due diligence (HRDD) specifically targeted for first mile operations in agricultural supply chains. Companies that use the FLDD Toolkit to guide their own due diligence actions can use this First Mile Toolkit to align suppliers’ practices to their own and help suppliers meet HRDD requirements.



Like the full FLDD Toolkit, the components of the First Mile Toolkit align with the due diligence steps of the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct, providing tailored guidance that is relevant for first mile contexts.

## Toolkit Components

- Embedding Human Rights in First Mile Operations
- In-Depth Assessment of Risks & Harms
- Action Plans
- Capability Building in the First Mile
- Collaboration for Prevention & Mitigation
- Grievance Mechanisms
- Farm Monitoring & Auditing
- Remediation of Harms
- Continual Improvement of Due Diligence

# The First Mile of Agricultural Supply Chains

The **first mile** of an agricultural supply chain begins at the farm and includes the first point of commodity aggregation, which is referred to in this toolkit as the **first mile operation** — the place where commodities from different farms are aggregated. Examples of first mile operations include palm oil mills, sugar mills, coffee wet mills, cocoa cooperatives, cotton gins, and fruit packing plants. Due diligence in the first mile means ensuring that human rights are respected at all points of commodity production from the farm to the first point of aggregation, including crop cultivation and harvesting, farmgate purchasing, transportation, warehousing, and primary processing. Extending due diligence to this level is critical, since the people working in the first mile (particularly farmworkers, smallholder farmers, and farming families) are often vulnerable to serious human rights harms like child labor, forced labor, and unsafe working conditions.

In many agricultural supply chains, especially those dependent on small-scale farmers, first mile operations are often small, with relatively simple management systems and record-keeping practices. Nevertheless, the management systems that such operations have in place can be optimized and used for effective human rights due diligence (HRDD), just as they are used to carry out other business functions. The purpose and core elements of HRDD are the same for first mile operators as they are for companies at other levels of the value chain, but the approach to HRDD implementation is typically more basic and practical at this level, tailored to the resource constraints and realities that first mile operators face.





# How to Use This Toolkit

Since due diligence is a cycle of continual improvement, the components of this toolkit do not all need to be implemented at once, although some do build upon each other. First mile operations can prioritize components based on local contexts, risks, and opportunities.

Within each component, the Toolkit outlines pathways for progress from “Basic” to “Established” to “Leadership” level. First mile operations can use the tool to evaluate their existing management system maturity, identify gaps and opportunities, and prioritize actions.

Over time, operations should aim to reach at least “Established” level on every component of due diligence; reaching “Leadership” will help distinguish first mile operators as valued, socially responsible suppliers in the eyes of their buyers.



As first mile operations work to put in place due diligence systems, it is critical that they engage with key stakeholders, including stakeholders whose human rights are most affected by their operations. Guidance on stakeholder engagement is included at various points in the toolkit.





# Embedding Human Rights in First Mile Operations

The first step of due diligence should be to embed human rights into business management systems. A key foundation for this work would be to develop a policy on human rights, or on specific human rights issues known to be high risk. The policy should be communicated to those who must implement it, including staff within the operation, farmers who supply to the operation, and other actors within the first mile such as labor recruiters, crew leaders, and field supervisors. The first mile operation must put in place systems to hold staff, farmer suppliers, and other relevant actors accountable for compliance with local laws, client codes of conduct, and other requirements, and must invest in building capacity to support that compliance. It must also periodically evaluate the success of these efforts and where it needs to improve.

Most first mile operations have at least some of these pieces in place to varying degrees, although additional budget and staffing might be needed to ensure successful implementation and deployment for human rights due diligence.



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## Embedding Human Rights in First Mile Operations

# Basic



## At this maturity level

**The first mile operation has a human rights policy in place, has assigned accountability and responsibility for implementing it, and has communicated it to its supplier farms.**

At the “Basic” maturity level, human rights concepts may be new to some operations, and developing a policy is the starting point. This policy should commit to respecting human rights and complying with locally applicable labor laws. It should be aligned with, or exceed, codes of conduct or other performance standards required by buyers.

The operation should set clear expectations for the actors who must comply with this policy, such as the supplier’s own buyers, agronomists/field agents, and facility or farm managers, as well as the farms from which the operation sources.

Internally, the operation should set clear lines of accountability and responsibility for implementing the human rights policy. Senior executives/managers should be held accountable for human rights performance, and staff should be assigned clear roles for implementation. In most cases, this means hiring staff with appropriate human rights knowledge and capabilities to support full implementation.

## How to get there

1. Assign person to lead policy development
2. Review existing policies, standards, and customer requirements
3. Draft/update and finalize policy
4. Hire staff, if needed, with appropriate human rights knowledge and capabilities
5. Clarify and assign roles, responsibilities, and accountabilities for implementing the policy internally, and in the supply chain
6. Communicate policy to supplier farms

## Embedding Human Rights in First Mile Operations

# Established



## At this maturity level

**In addition to “Basic,” the first mile operation has documented procedures relating to the implementation of the policy and formalized a process to monitor its own performance in meeting the policy. It has clarified expectations and provided support to its supplier farms to promote compliance.**

At the “Established” level, the operation should have formal, documented processes, procedures, and lines of responsibility for implementing HRDD, and all staff should have a clear understanding of their responsibilities.

Communication of human rights policies and expectations to supplier farms should also be formalized, such as through written contracts, information sessions, and other ways to ensure they know and understand the requirements. In addition to making requirements clear, the operation should also seek to understand what support supplier farms need in order to comply and provide that support where possible.

## How to get there

1. Document procedures related to implementation of the human rights policy and assign responsibility to staff for these tasks
2. Formalize expectations and agreements with supplier farms
3. Support supplier farms with guidance and tools to promote compliance
4. Solicit feedback from supplier farms and use feedback to improve policy, procedures, and practices



## Embedding Human Rights in First Mile Operations

# Leadership



## At this maturity level

**In addition to “Established,” the first mile operation is holding first mile actors, such as labor recruiters, crew leaders, and field supervisors, accountable for their roles in implementing the human rights policy and procedures. It has identified gaps in practices internally and in the first mile, and is addressing them through targeted training, guidance, and tools. It routinely evaluates the effectiveness of its interventions and adjusts for continual improvement.**

At the “Leadership” level, the first mile operation should extend its human rights policy and expectations to cover actors in the first mile who traditionally operate informally, such as labor recruiters and crew leaders. These relationships should be formalized and documented, and these actors should have a clear understanding of their responsibilities related to human rights. For example, all labor recruiters should have accurate and verifiable documentation on each worker recruited. Where there are gaps in implementation, the operation should provide guidance and support.

At this level, the operation's data systems are mature enough to proactively identify and address gaps or failures in systems and processes and make improvements over time.

## How to get there

1. Formalize expectations and agreements with first mile actors such as labor recruiters, crew leaders, and field supervisors
2. Support these first mile actors with guidance, tools, and training to promote performance improvement and measure results
3. Solicit feedback from first mile actors and use feedback to improve policy, procedures, and practices
4. Collect and evaluate information on suppliers' compliance and gaps in practices and use that to improve performance
5. Ensure permanent funding for HRDD, typically through incorporation into the price of goods to customers

# In-Depth Assessment of Risks & Harms

In-depth assessments capture information on human and labor rights issues at the sub-country level (state, municipality, community, first mile operation, a particular group of small farms, a particular supply chain, etc.). These assessments may be initiated by companies that buy from first mile operations to better understand risks at the first mile level, or they may be initiated by first mile operations themselves to understand the human rights challenges in their own facilities and supply chains. In-depth assessments may be self-administered or done by a third party. They should build on existing information, such as audits, internal records, and any other existing data, and capture information about various actors such as labor recruiters and crew leaders.

All human rights assessments should include analysis of applicable laws (labor, land tenure, environmental), environmental challenges, conflict and security conditions, and other context factors relevant for operations. They should examine the nature of any relevant human and labor rights issues and their root causes. Root cause analysis helps the operation understand any drivers of human rights harms within its own operations or deriving from its business practices, as well as drivers originating in the supply chain. A strong understanding of root causes enables the operation to design more effective approaches to prevent problems from recurring. For example, low income for farming families is often found to be a root cause of child labor.





In-Depth Assessment of Risks & Harms

Basic



At this maturity level

**The operation has determined where a greater understanding of its risks is needed, and it has decided how it will do in-depth assessments.**

If the operation has staff who are human rights experts, it may choose to carry out in-depth assessments internally. Many operations choose to outsource this activity to organizations that are experts in human rights issues or social research.

Even at the "Basic" level, it is key to identify the stakeholders who should be engaged in the assessments, including farmers, workers, and community members whose lives and livelihoods are affected by the operation’s activities. Assessments should also include input from other relevant actors with knowledge or influence on human rights issues, such as community leaders, government institutions, employers' or workers' organizations, and civil society organizations.

How to get there

- 1. Identify which salient issue(s) or geographic zone(s) will be targeted for in-depth assessment(s)
- 2. Map relevant stakeholders and ensure they are engaged as part of the assessment(s)
- 3. Decide if the assessment(s) will be done by internal staff or a third-party

In-Depth Assessment of Risks & Harms

Established



At this maturity level

**In addition to “Basic,” the operation has carried out in-depth human rights risk assessment(s), giving it a detailed understanding of its salient human rights risks and harms.**

The methodologies used for assessments depend on many factors, including prior knowledge about the salient issues of focus, accessibility of data, budgetary constraints, and other factors. Methods can include desk-based research, mobile phone surveys, in-person interviews, and focus groups, and can be qualitative, quantitative, or a combination. Common types of assessments include Human Rights Impact Assessments (HRIAs) and rapid appraisals.

Whatever method is chosen, workers from different job categories should be consulted, including field workers performing tasks such as transplanting, weeding, pruning, or harvesting, as well as other job functions such as crop processing, packing, or transporting. Workers from different demographic groups should be sampled as well, including migrants, female workers, youth workers, and workers from all relevant ethnic and racial groups. Any worker interviews should be designed to minimize harm to workers and should be carried out by culturally competent interviewers.

Assessments should include analysis of the root causes of any human rights issues identified.

How to get there

1. Secure the necessary resources and/or budget for assessment(s)
2. Develop or adopt a methodology and train implementer(s) if necessary
3. Undertake assessment(s), with participation and validation of findings by stakeholders
4. If severe harms are found during assessment(s), ensure that sufficient information is gathered to understand and address root causes
5. Record assessment data in internal systems, as appropriate



In-Depth Assessment of Risks & Harms

# Leadership



At this maturity level

**In addition to “Established,” the operation routinely reviews and updates its in-depth risk assessments and conducts assessments on additional issues or geographic zones.**

At the “Leadership” maturity level, the operation should have a protocol for when to repeat assessments or conduct additional assessments. As the operation gains experience in doing in-depth assessments, it should increasingly use findings to inform business practices and overall HRDD strategy.

How to get there

- 1. Continually improve assessment tools and methods in keeping with evidence-based good practice
- 2. Establish standard operating procedures for circumstances that trigger new or re-assessments
- 3. Expand assessments to cover additional issues or geographic zones, in order of priority
- 4. Apply the learnings from each round of assessments to the operation’s HRDD action planning (see [Action Plans](#))





# Action Plans

Once the first mile operation has more insight into its human rights risks and potential harms, including their root causes, it is ready to develop a detailed action plan. Action plans can include process-oriented objectives (e.g., improving HRDD policies, procedures, and training), and outcome-oriented objectives (e.g., ensure that the children of supplier farmers and migrant workers attend school full-time). Action plans should seek to address the root causes of human rights risks and harms. For example, if root cause analysis has identified that workers are unable to meet production quotas within a normal workday, the plan should set an objective to make production quotas realistic. If root cause analysis has identified that some workers' children do not attend school due to lack of transportation, the plan should set an objective to find ways to make transportation available.

The deployment of action plans requires resources and personnel who are familiar with human rights issues. Since these may not be available, at least at first, first mile operations should seek resources and support from their buyers, making clear that such support will help enable them to comply with their buyers' human rights requirements. The operation should also seek out ways to collaborate with civil society groups, government agencies, and other stakeholders in the region for support in meeting action plan objectives (see [Collaboration for Prevention & Mitigation](#)).

Although action plans help first mile operations mitigate risk, they should be framed foremost in terms of supporting supplier farmers and other first mile actors. Addressing human rights in supply chains, especially in the first mile, is a very complex and difficult endeavor, and small farmers, labor recruiters, and other key actors in the first mile often lack the resources and training they need to tackle these challenges.





Action Plans

# Basic



At this maturity level

**The operation has developed an action plan to address the human rights risks and harms identified in its facilities and supply chains.**

Developing these plans can be done by the operation alone, or with support from buyers or third-party partners. Plans may also include commitments to collaborate with locally-based implementation partners on specific activities.

How to get there

- 1. Create an action plan, with an initial focus on improving internal management systems and processes
- 2. Engage supplier farmers and other stakeholders to understand what will be required to effectively address the root causes of human rights risks and harms
- 3. Prioritize supplier farmers and/or other first mile actors (labor recruiters, crew leaders, etc.) to receive capability building and intensive engagement
- 4. Secure budget for initial implementation of activities

## Action Plans

# Established



## At this maturity level

**In addition to “Basic,” the operation is implementing its action plan, starting with early-stage interventions, and building trust and capability among farmer suppliers and other stakeholders.**

At the “Established” maturity level, the operation should build out activities under the plan(s). It should begin implementing these activities and track them over time.

At this level of maturity, the operation should be fully aware of the importance of investing resources into action planning and programming to achieve its human rights objectives and should have dedicated (financial and human) resources in its budgets for this purpose.

## How to get there

1. Begin implementation of the action plan, focusing on early-stage activities and interventions such as establishing or improving management systems, training staff, and raising awareness among supplier farmers of human rights issues
2. For each activity and intervention, assign accountable persons, action items, timelines, resource requirements, and measures of success
3. Work with operation management, buyers, and other external partners to secure resources for plan implementation and expansion over time





Action Plans

# Leadership



At this maturity level

**In addition to “Established,” the operation is actively engaged in implementing impact-focused action plans, and it is broadening the scope of implementation to additional at-risk farmer suppliers, supply chains, and geographies.**

At the “Leadership” maturity level, the operation should have fully activated the plan(s), including dedicated funding and partnerships to implement interventions that address the main structural drivers of risk.

How to get there

- 1. Deepen programs to improve systems and achieve impact in reducing risks and harms due to root causes
- 2. Obtain commitment from operation management and/or buyers for sustainable funding to support ongoing programming and action plan implementation
- 3. Document and communicate best practices identified during plan implementation
- 4. Routinely engage affected stakeholders to participate in the evaluation of the impact achieved to continually strengthen plans and programs
- 5. Develop action plans for additional issues or geographic areas as needed

# Capability Building in the First Mile

Within first mile operations, there are many target groups that can benefit from training and capability building, including the operations' own staff, the service providers they work with (e.g. labor providers or providers of services such as crop spraying), agronomists or buying agents who visit farms on a regular basis, the farmers who sell to the operation, farm workers, and others.

Some examples of training and capability building for different target groups include:

- Training for people responsible for recruitment and hiring: how to screen job candidates (age documentation, checking whether workers have paid recruitment fees, etc.)
- Training for labor brokers: how to recruit workers, paperwork required, expectations regarding transportation, housing, and other benefits
- Training for field supervisors or crew leaders: worker treatment, hydration breaks, rest/shade breaks, personal protective equipment, etc.

- Training for agricultural extension workers: “red flags” to look for linked to child labor, forced labor, or other human rights harms
- Training for farmers or farmer organizations such as cooperatives: labor rights, legal requirements, relevant compliance standards
- Training for workers or workers' organizations: training on basic labor rights and how to raise complaints/seek redress

Training and awareness-raising programs in the first mile should be appropriate for people of different linguistic, cultural, and educational backgrounds, and different levels of access to technology, and should be respectful of the time constraints faced by trainees, especially during labor-intensive phases of agricultural cycles.

Of course, training and capability building are an investment of time, effort, and funds. First Mile operations may be able to obtain funding or technical assistance from buyers, government, or civil society collaborators to support them in these efforts, to enable them to comply with legal and customer human rights requirements.





Capability Building in the First Mile

Basic



At this maturity level

**The first mile operation has identified internal stakeholders and supplier farmers that are most in need of capability building, and it has begun rolling out training to these groups.**

Basic training for staff and farmer suppliers often focuses on building awareness and understanding of human rights issues, local laws on these issues, and customer requirements related to human rights. It may also cover how to spot “red flags” for human rights issues, how to report concerns, and other topics.

Development and delivery of training may be financed and driven by the operation itself, or the operation may receive training support from civil society partners or buyers, depending on the nature of the business relationship and other factors.

How to get there

- 1. Identify target groups within the first mile operation in need of training and capacity building (e.g., managers, supervisors, sustainability staff, Human Resources staff)
- 2. Identify farmer suppliers in need of training and capacity building support
- 3. Develop training plans and materials tailored to the target audiences, or work with an external partner to do so
- 4. Deliver (or have partner deliver) trainings, and survey participants on learnings

Capability Building in the First Mile

# Established



## At this maturity level

**In addition to “Basic,” the operation continues to roll out training on human rights issues, expanding training to cover additional topics and reach additional target groups.**

At the “Established” maturity level, operation staff should be trained on such due diligence practices as assessing their own risks, monitoring compliance of the supplier farms from which they source, establishing grievance processes, remediating harms, and other topics.

Training for farmer suppliers and other first mile actors should clearly communicate the operation’s expectations for protecting workers. Depending on the most salient labor rights risks, the training could include such topics as how to identify forced labor in the worksite, activities children can and cannot perform, and safe handling of agrochemicals, among many others. Training should be provided in languages and media that are appropriate to the audiences, and it should offer guidance in practical terms that reflects the realities and challenges that first mile actors face.

## How to get there

1. Expand the training for staff to cover implementation of effective due diligence of supplier farmers
2. Expand training for supplier farmers to cover processes, procedures, and systems for managing their own risks and reporting to the first mile operation
3. Expand the reach of trainings to include more farmers
4. Expand the reach of training to cover labor recruiters, crew leaders, farmers’ associations, workers’ organizations, and other third-parties who have contact with workers
5. Track training participation, learning, and outcomes to enable continual improvement of the training program



Capability Building in the First Mile

# Leadership



## At this maturity level

**In addition to “Established,” capacity building continues to deepen within the first mile operation and its supply chain, with training curricula updated as needed and tracking data showing measurable impact.**

At the “Leadership” maturity level, training for staff, farmer suppliers, labor suppliers, and other relevant first mile actors should be a standard part of the operation's human rights activities. First mile operations should have significantly increased capacity to manage their own human rights risks and impacts as well as those in the supply chain.

At this level of maturity, first mile operations should either directly train the workers of the farmers from whom they source, or provide materials to farmers, crew leaders, and others who are regularly in touch with workers, to ensure that workers are aware of their labor rights.

## How to get there

1. Provide training to workers of the farmers who supply to the first mile operation, or support other actors to provide this training
2. Routinely evaluate the impact of training among all target groups to assess whether it has reduced risks and harms
3. Use data to improve training effectiveness and drive HRDD improvements
4. Ensure budget for ongoing training programs

# Collaboration for Prevention & Mitigation

Because business operations exist in a variety of geographic, political, institutional, social, economic, and cultural contexts, and because the root causes of human rights risks are often beyond one company's control, first mile operations rarely achieve their human rights objectives without collaboration. Operations can collaborate with partners across the private sector, government, and/or civil society. Forms of collaboration include public-private partnerships, multi-stakeholder groups, industry-specific initiatives, industry-led platforms and associations, and landscape approaches, among others.

Together, partners can explore collective ways to address common human rights risks, and design interventions that align different stakeholders' actions to complement and support one another. This is particularly important when working on landscape- or country-level root cause issues that drive risk for all operations in the landscape. For example, supporting

women's financial literacy initiatives or livelihood skills training programs can benefit local communities and mitigate the risks of labor abuses for all operations based in those communities.

Collaboration provides:

- an opportunity to learn from others about good practices within a specific sector or geography, to avoid reinventing the wheel;
- a chance to gain more accurate information about conditions facing workers within a particular sector, country, or region;
- a forum for multi-company or industry-wide training and capacity building;
- a place to forge solutions to complex challenges and issues; and
- a collective platform from which to advocate for legal, policy, or regulatory reform (e.g., the strengthening of local law and public enforcement mechanisms).





Collaboration for Prevention & Mitigation

Basic



At this maturity level

**The first mile operation has identified which human rights risks and supplier-related risks it can address by itself, and which will require collaboration with others.**

At the “Basic” level, the company may not yet have a complete picture of the collaborative initiatives that are already working on human rights issues. These should be mapped and analyzed based on relevance, degree of impact on an issue, nature of engagement on the issues in question, resources and level of effort required for participation, and other factors.

How to get there

- 1. Identify which human rights risk issues can best be handled through collaboration
- 2. Identify farmer suppliers that also sell to peer companies to explore joint engagement with those peers and suppliers
- 3. Identify key forums for collaboration that already exist, focused on the relevant human rights issue, commodity, and/or geographic zone
- 4. If gaps exist, consider initiating new collaborations

Collaboration for Prevention & Mitigation

# Established



At this maturity level

**In addition to “Basic,” the operation has identified collaborations that will help it achieve its human and labor rights objectives and drive change, and it has started engaging with relevant partners and/or joining existing initiative(s).**

At the “Established” maturity level, the company should have thoroughly analyzed existing opportunities for collaboration and decided to join one or more specific initiatives or engage stakeholders in setting up a new forum for collaboration if needed.

The decision to engage should come with leadership's commitment to dedicate financial and human resources to the collaborative initiative and staff's commitment to participate actively. This means participating in defining goals, developing theories of change, designing strategies, and setting timelines to ensure that the collaboration bears fruit. Collaborative initiatives rely on their members’ active participation to achieve results.

How to get there

- 1. Identify staff responsible for engaging in collaborative initiatives, and equip and empower them to speak on behalf of the operation
- 2. Participate actively in selected collaborative initiatives
- 3. Ensure sufficient internal support (dedicated time, budget, commitments, etc.) for meaningful participation
- 4. Communicate about involvement in collaborative initiatives in order to drive participation by others and support from operation management



Collaboration for Prevention & Mitigation

# Leadership



## At this maturity level

**In addition to “Established,” the operation is an active member of one or more collaborative initiative(s) and commits funds and resources to ensuring their success.**

At the “Leadership” maturity level, the operation should continually identify new opportunities for collaboration, influence others to join, and drive strategy within the initiatives it is part of. It should have built strong relationships with key relevant government and civil society stakeholders.

## How to get there

- 1. Continue to dedicate financial and human resources to participation
- 2. Team members take up key decision-making positions and are active in shaping strategy
- 3. Continually assess the outcomes of collaborative initiatives and push for greater impact

# Grievance Mechanisms

Every first mile operation should establish or participate in grievance mechanisms to provide channels for individuals and communities at risk or affected by human rights harms to raise concerns and have them remediated. Principle 31 of the United Nations Guiding Principles on Business and Human Rights (UNGPs) provides clear guidance on the necessary characteristics of non-judicial grievance mechanisms: they must be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.

Simply having a grievance mechanism in place in a supply chain is not enough if it is rarely used by the population it is trying to reach. For workers and community members to use a grievance mechanism, they must see it as trustworthy and fair, be able to access it easily, and have confidence that their complaints will be taken seriously and result in helpful outcomes. Grievance mechanisms often involve establishing committees or other working groups, and implementers should reach out to affected stakeholders to build awareness and trust – a process that can take time. It should always be possible to submit grievances anonymously if desired, and people filing complaints must be protected from retaliation.

The design of grievance mechanisms should be informed by the input of workers and other stakeholders affected by

operations and should reflect the workforce population, languages, cultural characteristics, literacy levels, access (or not) to phones and internet, and other factors. Grievance mechanisms should be available to all stakeholders, including migrant, seasonal, and temporary workers. Creative approaches such as outreach in migrant-sending communities and community-based or regional complaints systems may be necessary to reach some populations.

Staff or external providers operating the mechanism should be trained on their roles and responsibilities, with standard operating procedures for receiving and processing complaints, initiating remediation and/or referral to appropriate services, and following up to ensure cases are resolved effectively. Large companies may also need to invest in centralized integration of data coming in from grievance systems established in different business units or supplier operations.

Grievance mechanisms should never replace other forms of supply chain monitoring, stakeholder engagement, or collective bargaining processes. They should not be used to undermine the role of legitimate trade unions in addressing labor-related disputes, or to prevent workers' other means of accessing remedy.



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Grievance Mechanisms

Basic



At this maturity level

**The operation has a grievance mechanism in place for complaints related to its own operations and has personnel in place to receive and handle grievances.**

At the "Basic" level, the operation should put in place a grievance mechanism accessible to its own employees and its direct farmer suppliers, at a minimum. It is important to provide more than one channel to which stakeholders can bring grievances, such as suggestion boxes, hotlines, specific worker representatives to whom grievances can be reported, or others. The operation can choose to manage grievance mechanisms in-house, or work with an external provider. It may also build upon existing complaint channels operated by unions, workers' organizations, and/or farmers' associations, the government, or civil society organizations.

How to get there

- 1. Engage internal stakeholders and farmer suppliers to determine which channel(s) they are most likely to use
- 2. Determine who will manage and administer the grievance mechanism (staff or third-party provider)
- 3. Establish channel(s) for receiving and systems for handling grievances
- 4. Train responsible team(s)
- 5. Promote mechanism among staff and farmer suppliers

Grievance Mechanisms

# Established



At this maturity level

**In addition to “Basic,” the operation makes the grievance mechanism accessible to more stakeholders in the first mile.**

At the "Established" maturity level, the operation should expand its grievance mechanism to a broader range of affected stakeholders. The operation should support its staff or external provider to improve the grievance system, for example by adding additional complaint channels or promoting uptake in target communities through awareness raising.

How to get there

- 1. Receive and process grievances from staff and farmer suppliers, as needed
- 2. Seek feedback to evaluate the effectiveness of grievance mechanism
- 3. Extend coverage of grievance mechanism to enable access to all potentially affected stakeholders, including workers of supplier farmers, their families, and community members
- 4. Promote mechanism to additional target populations



Grievance Mechanisms

# Leadership



At this maturity level

**In addition to “Established,” the operation’s grievance mechanism is operating well and resolving complaints effectively. Where needed, the operation engages with other operations, government, and/or civil society to promote access to grievance mechanisms and remedy for affected stakeholders.**

At the "Leadership" maturity level, the operation’s grievance mechanism should be accessible to all stakeholders in all geographic zones where it has operations or supply chains.

How to get there

- 1. Analyze and use grievance mechanism data to drive improvements (see [Continual Improvement of Human Rights Due Diligence](#))
- 2. Conduct outreach to workers and other relevant stakeholder groups to improve accessibility and effectiveness of grievance mechanisms
- 3. Join existing collaborations on regional and/or sectoral grievance mechanisms, or work with partners to establish new collaborations

# Farm Monitoring & Auditing

Given the pervasiveness of family labor, seasonal labor migration, informality in hiring, sub-minimum wage pay, occupational health and safety hazards, and other labor rights issues in the production of agricultural commodities, it is critical to have a monitoring system in place that covers not only the first mile operation, but the farms from which the operation sources.

There are various approaches to farm monitoring. Where possible, companies that buy from first mile operations, and in some cases first mile operations themselves, choose to deploy their own monitors to farms to check compliance and provide technical advice and support to farmers so they can meet human rights requirements. When done well, this sort of “internal” monitoring enables the company/operator to control standard requirements, ensure that monitors are well qualified and trained, employ rigorous data gathering and assurance approaches, strengthen relationships with farmers, and other substantial benefits for human rights due diligence. However, internal monitoring is typically more expensive than outsourcing audits to a third party such as an auditing or certification program, so not all companies/operations have it in place.

If a first mile operation utilizes third party audits or certifications, it is important to note that audit/certification

programs vary tremendously in their coverage of human rights issues and auditing/assurance methods. The choice of audit/certification programs is often driven by buyers, but if first mile operations have the freedom to choose, they should select the most rigorous option from the programs available.

Most monitoring, auditing, and certification programs work on a sampling basis, covering a sample of the operation's base of supplier farms. Over time, this sample should increase, until monitoring covers all farms in the operation's at-risk commodities and geographic zones. Frequency of monitoring/auditing visits is also an important consideration. It is common for compliance or certification audits to take place once a year or even less frequently. Monitoring farms multiple times per growing season is much more likely to reveal an accurate and complete picture of human rights issues.

All monitoring visits should include farm observation, document review, and interviews with management, supervisors, workers, and other stakeholders. It is critical that monitors are trained in proper ways to conduct worker interviews. Information obtained from worker interviews should be kept anonymous, if possible, and interviewees should be protected from retaliation. Whenever possible, farm visits should not be announced in advance.



*Schusterbauer.com/Shutterstock*

# Basic



## At this maturity level

**The first mile operation makes key decisions about how farm-level monitoring will be done and secures necessary resources for monitoring. At the "Basic" level, a significant proportion of farm monitoring is often done through third party audits and/or certifications.**

Internal monitoring, whether done by a buyer or by the operation itself, gives the operation more control over monitoring methods, data collection, and quality. Internal monitors can be specifically hired to monitor human rights issues; alternatively, the operation can train agronomists and/or other staff who regularly visit farms to do human rights monitoring.

## How to get there

1. Decide whether to use internal monitors or external audits or certifications, or combine these approaches
2. If using external audits, select auditing/certification provider(s)
3. If using internal monitors, build monitoring program, design data collection tools, hire and train monitors
4. Ensure that any findings from audits or monitoring visits are followed up through a corrective action plan (See [Remediation of Harms](#))
5. Ensure that monitoring/auditing covers all relevant human rights issues and geographic zones



## Farm Monitoring &amp; Auditing

# Established



## At this maturity level

**In addition to “Basic,” farm monitoring/auditing is established and well-functioning, and the operation increases the proportion of farm monitoring that is done internally.**

Monitors should be trained to engage with farmers in a collaborative manner, supporting them to develop corrective action plans where needed and improve their labor practices.

## How to get there

1. Over time, increase the proportion of monitoring done internally
2. Continue to build the capacity of internal monitors
3. Whenever human rights harms are found through monitoring visits or audits, ensure that corrective action plans are fully implemented and that affected persons receive remedy (See [Remediation of Harms](#))



Farm Monitoring & Auditing

# Leadership



At this maturity level

**In addition to “Established,” the operation has internal monitoring fully in place, and engages an independent third party to verify the monitoring data.**

At the "Leadership" level, the operation should use year-on-year monitoring data to identify opportunities to improve monitoring quality and monitors' capabilities. It should also use monitoring data to inform human rights programming and adjust its action plans as needed (see [Action Plans](#)).

How to get there

- 1. Secure permanent budget for comprehensive and effective internal monitoring
- 2. Where internal monitoring is used, increase sample sizes, eventually reaching 100 percent coverage of all at-risk farms, and increase frequency of monitoring
- 3. Engage a third party to verify internal monitoring data; compare third-party data with internal data and adjust incentives and training for monitors as needed



# Remediation of Harms

If a human rights harm occurs on a farm or other workplace in the first mile, the operation must take prompt action to protect the affected person(s), provide remediation, and ensure that the issue does not recur. In practice, this often happens through the creation and implementation of a Corrective Action Plan (CAP).

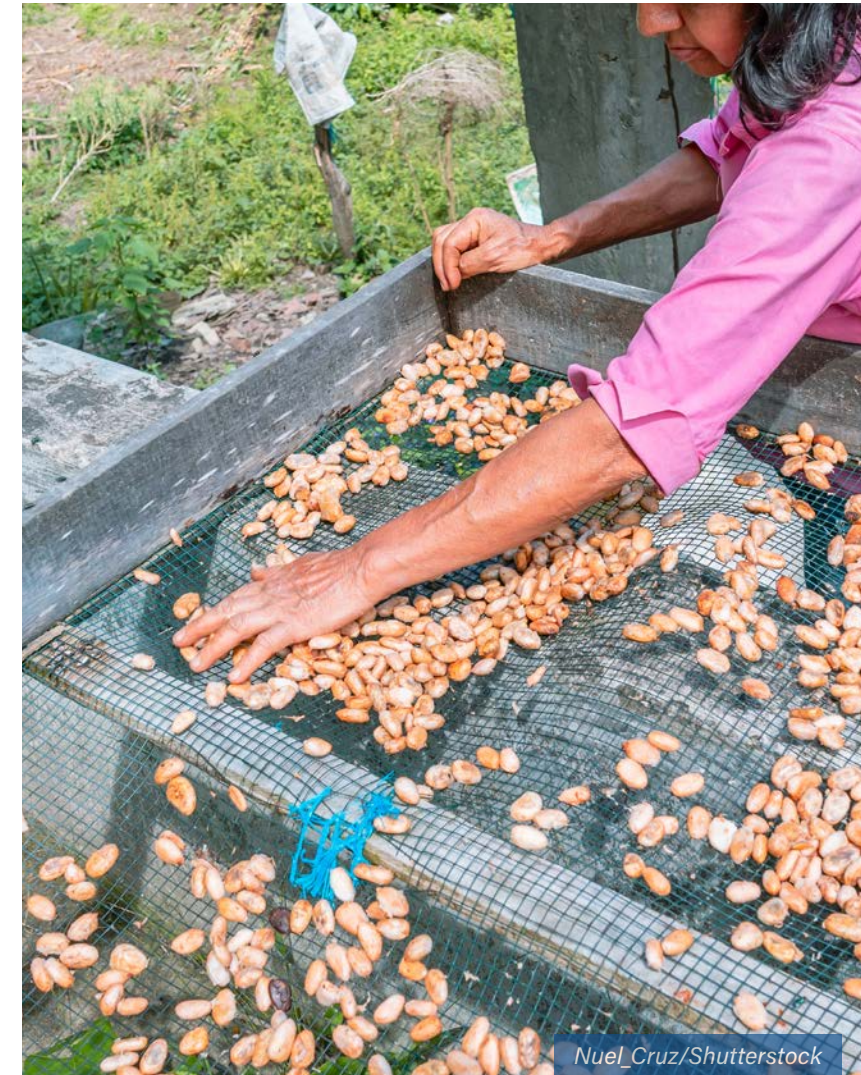
First mile operations should know the legal requirements around response and remedy, those required by their main customers, and any relevant voluntary certification standards in which they participate. They should develop systems and processes to support corrective actions, enabling them to address harms quickly and demonstrate their commitment to compliance and respect for human rights.

A robust CAP should cover the following steps:

- safeguarding of the affected worker(s) or other stakeholder(s), particularly if they face immediate danger, being sure to gain their consent to take any further actions;
- evaluating and documenting the issue, including gathering information about who was affected, how they were affected, and when, and where the harm occurred;
- identifying the underlying root causes that led to the issue;

- defining the appropriate type, form, scale, etc. of remedy and other corrective actions that are needed, drawing on input from affected stakeholders;
- determining the appropriate parties to provide compensation, services, or other appropriate remediation to the affected stakeholder(s);
- defining indicators and timelines to ensure that remediation and other corrective actions are successfully implemented;
- adjusting management systems and/or implementing community-level solutions to prevent recurrence;
- following up on cases to ensure and document that remedy is complete and sustainable.

In agricultural settings, determining appropriate remedies often requires local knowledge and understanding of cultural factors and other contextual causes of human rights issues. For example, if a child is found in an audit to be carrying heavy loads (a form of hazardous child labor), root causes could include the family's inability to pay school fees, the child's lack of a birth certificate, the family's indebtedness to a landlord under a sharecropping agreement, the lack of a water source near to the farm, or many other issues. In each of these circumstances, the remediation actions would be different. Regular stakeholder engagement with affected stakeholders is crucial to providing appropriate remedy and ensuring that root causes of human rights harms are addressed.



Remediation of Harms

Basic



At this maturity level

**The operation responds to a finding of human rights harm or a grievance by creating and implementing, or requiring that a supplier create and implement, a corrective action plan (CAP). The CAP should include both provision of remedy to affected persons and actions to prevent recurrence of the issue.**

Since implementation of CAPs often requires significant resources, it is important that the operation has a dedicated budget and/or human resources to deploy in remediation situations that may arise.

A key aspect of preparing for remedy is mapping organizations in the local area that can provide services to people identified in a risky or harmful situation. Examples might include women’s support centers, children’s advocacy organizations, religious organizations that offer protective services, legal support services, and government offices. Being familiar with these local resources helps staff and/or farmer suppliers refer affected persons appropriately.

How to get there

1. Review legal and customer requirements related to response and remedy processes
2. Secure necessary resources for provision of remedy
3. Identify services available in the relevant geographic area (government, NGOs, other) to which affected persons can be referred if remediation is needed
4. When a human rights harm is identified, create a CAP detailing both remedy to the affected person(s) and prevention of recurrence
5. Implement CAPs in the timeframes specified

Remediation of Harms

Established



At this maturity level

**In addition to “Basic,” the operation tracks and ensures that individual cases have been appropriately remediated, and that steps have been taken to prevent recurrence.**

At the “Established” maturity level, the relevant staff within the company and/or farmer suppliers should be familiar with the response protocol and corrective action planning process and should be strengthening their ability to implement these processes and prevent harms from occurring.

The company and/or farmer suppliers should have formal tracking systems in place to track the progress of cases being remediated and ensure that harms do not recur.

How to get there

1. Follow up on cases to ensure remedy was implemented and effective
2. Refer affected persons to remediation resources when needed
3. Engage affected persons and other stakeholders for input on root causes and appropriate remedies
4. Communicate with labor recruiters, supervisors, crew leaders, and other first mile actors about their responsibilities related to response and remedy, and hold them accountable
5. Record data on individual cases, corrective actions, and remediation outcomes
6. Report case data internally, and to customers as required under response protocols



Remediation of Harms

# Leadership



## At this maturity level

**In addition to “Established,” the operation collaborates with relevant government, civil society, and industry actors to develop or strengthen collaborative approaches to remediate and address systemic root causes of harms.**

At this level, the costs associated with corrective action plan implementation and provision of remedy should be fully internalized in the business model, and management systems should be continually improved to reduce the frequency and severity of harms.

## How to get there

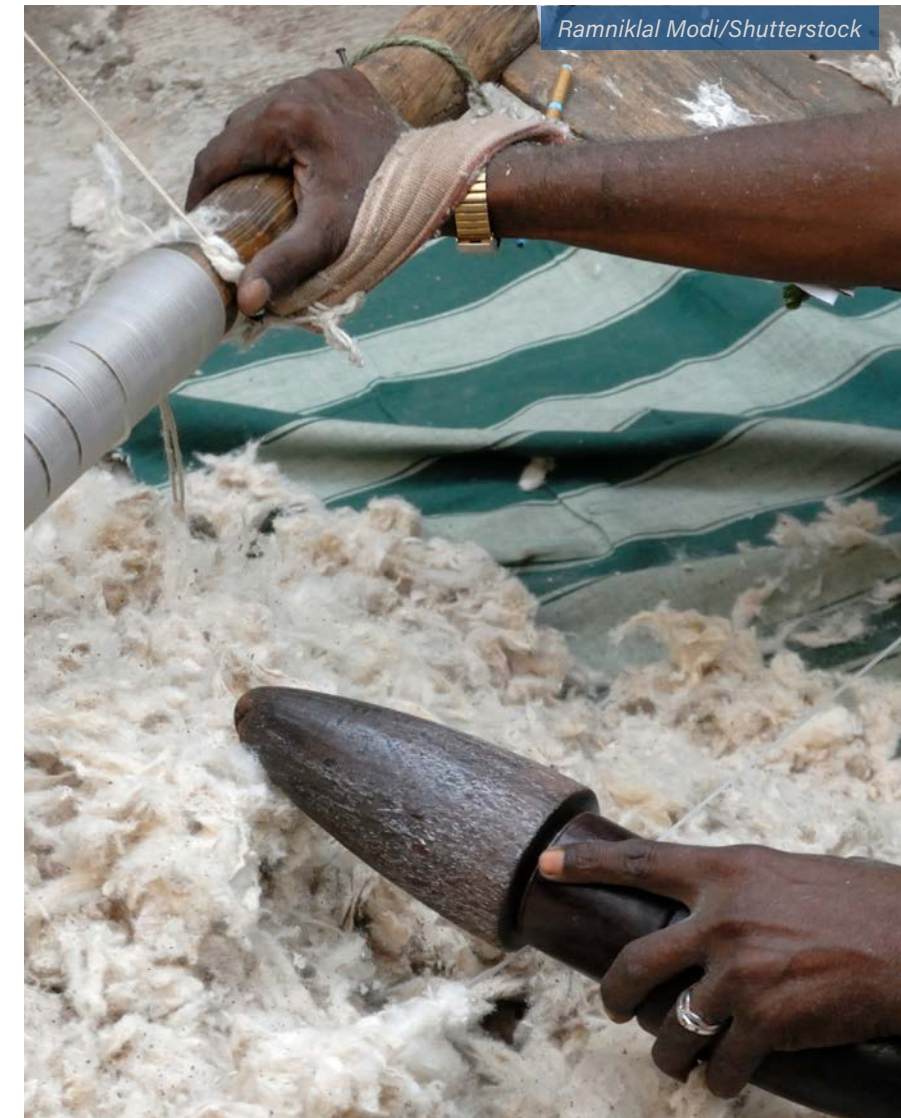
1. Analyze data on cases to identify common root causes and effective practices that can be scaled
2. Collaborate with peers, government, civil society, and/or multi-stakeholder initiatives and partnerships to address the more challenging systemic root causes of harms

# Continual Improvement of Due Diligence

An effective overall HRDD management system drives improvements in each of its components, becoming increasingly comprehensive, effective, and efficient over time. Improvements should happen in real time as weaknesses are spotted but often result from an annual review of the system, asking: Is our approach working the way we intended? Are we on track to meet our human rights objectives?

Continual improvement requires an understanding of what isn't working and why. To know what isn't working, a company needs to look at each area of its HRDD system, and ask questions like:

- **Policies:** Are our human rights policies adequate? Are they clear? How well are we communicating them to key internal and external stakeholders?
- **Risk assessment:** Have we identified the right risk issues? Are there issues we have missed? Are we distracted by issues that have very low probability?
- **Action plans:** Have we set the right objectives? What's our success rate in meeting our targets? Have we been too ambitious, or can we challenge ourselves more? Are we sufficiently addressing root causes, or only fixing symptoms?
- **Capability building:** Do we have the right people in the right jobs and have we enabled them to be successful through training, communications, and other support systems? Are we providing training and support to everyone who needs it; can we expand our scope?
- **Partners:** Are we working with the right collaborators to drive progress? Are our partnerships effective in addressing key risks to people in our supply chains? If not, are there ways we could strengthen the partnership or are there new potential collaborators we should approach?
- **Grievance systems:** Do our grievance mechanisms work? Do people use them and if not, why not? What's the feedback on accessibility and whether they are trusted?
- **Monitoring:** What are our top areas of non-compliance found by auditors/monitors? Does this seem accurate, or might some non-compliances be going under the radar? Do our stakeholders find auditing/monitoring to be reliable and accurate?
- **Remediation:** Are corrective action plans appropriate and proportionate to the non-compliance? Do affected parties report satisfaction with the remediation delivered? What's our record on recurrence of issues?



Continual Improvement of Due Diligence

Basic



At this maturity level

**The first mile operation is taking steps to examine the HRDD programs and systems it has in place, what is working well, and what is missing or not yet sufficiently developed.**

At the "Basic" level, the operation should gather information from different teams and stakeholders and review existing data. If the operation’s Action Plan includes indicators to track progress on HRDD implementation and/or impact, they should be examined as well.

Review of this information and speaking with relevant stakeholders enables the company human rights lead (or team) to identify gaps and needs and clarify areas for focused attention within its HRDD system.

How to get there

- 1. Convene a team to conduct a review of the operation's HRDD systems
- 2. Design the review, referring to the questions above and adding other relevant questions
- 3. Review human rights data already being collected, including on supplier performance
- 4. Interview relevant internal stakeholders to identify challenges, gaps, and needs
- 5. Benchmark the level of implementation maturity for each component of the company's HRDD system, and develop timelines for improvement of each as needed



Continual Improvement of Due Diligence

# Established



At this maturity level

**In addition to "Basic," the operation is working actively to close gaps in its HRDD systems, address recurring issues, build the capacity of relevant actors (both internal and external), and broaden and deepen the reach of its HRDD coverage.**

At the "Established" maturity level, the operation should work internally with relevant staff to improve the different components of its overall HRDD system, and to identify and address persistent issues. It should engage with farmer suppliers to understand root causes, require improvements, and support them to improve. The company may also notify suppliers of consequences if expectations are not met, for example exclusion from a cooperative or reduced services.

How to get there

- 1. Adapt the operation’s Action Plan to address internal HRDD system gaps or capacity needs, including indicators and time-bound milestones to ensure progress
- 2. Establish prioritized list of persistent issues to tackle, conduct root cause analysis of them, and develop targeted action plans for each
- 3. Provide tools and guidance for internal and external actors needing support
- 4. Engage with and develop performance improvement plans for farmer suppliers or other relevant actors needing support (such as labor recruiters, crew leaders, and farmers)

Continual Improvement of Due Diligence

# Leadership



## At this maturity level

The operation can be said to be at a “Leadership” level if it has reached the "Established" or "Leadership" level of maturity across all components of its HRDD system (benchmarked using this framework).

At the "Leadership" level, the operation should have actively embedded respect for human rights in its business practices and management systems. Its leaders should recognize the importance of HRDD and allocate necessary resources to implementation. Human rights focused staff, at-risk farmers, and other key stakeholders should receive ongoing support training.

## How to get there

- 1. Repeat the review of the operation’s HRDD systems periodically, ensuring senior level involvement and support
- 2. Secure funding for any necessary investments in major system improvements
- 3. Work to improve the quality of HRDD data, by deploying targeted training or other support to relevant stakeholders
- 4. Engage an independent third party to verify progress



# First Mile Maturity Benchmarking Tool



BASIC



ESTABLISHED



LEADERSHIP

## Components

### Embedding Human Rights in First Mile Operations

The first mile operation has a human rights policy in place, has assigned accountability and responsibility for implementing it, and has communicated it to its supplier farms.

In addition to “Basic,” the first mile operation has documented procedures relating to the implementation of the policy and formalized a process to monitor its own performance in meeting the policy. It has clarified expectations and provided support to its supplier farms to promote compliance.

In addition to “Established,” the first mile operation is holding first mile actors, such as labor recruiters, crew leaders, and field supervisors, accountable for their roles in implementing the human rights policy and procedures. It has identified gaps in practices internally and in the first mile, and is addressing them through targeted training, guidance, and tools. It routinely evaluates the effectiveness of its interventions and adjusts for continual improvement.

### In-Depth Assessment of Risks & Harms

The operation has determined where a greater understanding of its risks is needed, and it has decided how it will do in-depth assessments.

In addition to “Basic,” the operation has carried out in-depth human rights risk assessment(s), giving it a detailed understanding of its salient human rights risks and harms.

In addition to “Established,” the operation routinely reviews and updates its in-depth risk assessments and conducts assessments on additional issues or geographic zones.



# First Mile Maturity Benchmarking Tool



BASIC



ESTABLISHED



LEADERSHIP

Components

Action Plans

The operation has developed an action plan to address the human rights risks and harms identified in its facilities and supply chains.

In addition to “Basic,” the operation is implementing its action plan, starting with early-stage interventions, and building trust and capability among farmer suppliers and other stakeholders.

In addition to “Established,” the operation is actively engaged in implementing impact-focused action plans, and it is broadening the scope of implementation to additional at-risk farmer suppliers, supply chains, and geographies.

Capability Building in the First Mile

The first mile operation has identified internal stakeholders and supplier farmers that are most in need of capability building, and it has begun rolling out training to these groups.

In addition to “Basic,” the operation continues to roll out training on human rights issues, expanding training to cover additional topics and reach additional target groups.

In addition to “Established,” capacity building continues to deepen within the first mile operation and its supply chain, with training curricula updated as needed and tracking data showing measurable impact.

Collaboration for Prevention & Mitigation

The first mile operation has identified which human rights risks and supplier-related risks it can address by itself, and which will require collaboration with others.

In addition to “Basic,” the operation has identified collaborations that will help it achieve its human and labor rights objectives and drive change, and it has started engaging with the relevant partners and/or joining existing initiative(s).

In addition to “Established,” the operation is an active member of one or more collaborative initiative(s) and commits funds and resources to ensuring their success.

# First Mile Maturity Benchmarking Tool



BASIC



ESTABLISHED



LEADERSHIP

## Components

### Grievance Mechanisms

The operation has a grievance mechanism in place for complaints related to its own operations and has personnel in place to receive and handle grievances.

In addition to “Basic,” the operation makes the grievance mechanism accessible to more stakeholders in the first mile.

In addition to “Established,” the operation’s grievance mechanism is operating well and resolving complaints effectively. Where needed, the operation engages with other operations, government, and/or civil society to promote access to grievance mechanisms and remedy for affected stakeholders.

### Farm Monitoring & Auditing

The first mile operation makes key decisions about how farm-level monitoring will be done and secures necessary resources for monitoring. At the “Basic” level, a significant proportion of farm monitoring is often done through third party audits and/or certifications.

In addition to “Basic,” farm monitoring/auditing is established and well-functioning, and the operation increases the proportion of farm monitoring that is done internally.

In addition to “Established,” the operation has internal monitoring fully in place, and engages an independent third party to verify the monitoring data.

# First Mile Maturity Benchmarking Tool



BASIC



ESTABLISHED



LEADERSHIP

## Components

### Remediation of Harms

The operation responds to a finding of human rights harm or a grievance by creating and implementing, or requiring that a supplier create and implement, a corrective action plan. The corrective action plan should include both provision of remedy to affected persons and actions to prevent recurrence of the issue.

In addition to "Basic," the operation tracks and ensures that individual cases have been appropriately remediated, and that steps have been taken to prevent recurrence.

In addition to "Established," the operation collaborates with relevant government, civil society, and industry actors to develop or strengthen collaborative approaches to remediate and address systemic root causes of harms.

### Continual Improvement of Due Diligence

The first mile operation is taking steps to examine the HRDD programs and systems it has in place, what is working well, and what is missing or not yet sufficiently developed.

In addition to "Basic," the operation is working actively to close gaps in its HRDD systems, address recurring issues, build the capacity of relevant actors (both internal and external), and broaden and deepen the reach of its HRDD coverage.

The operation can be said to be at a "Leadership" level if it has reached the "Established" or "Leadership" level of maturity across all components of its HRDD system (benchmarked using this framework).



# Further Resources

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## Embedding Human Rights in First Mile Operations

For information on the risks associated with identity document retention and steps businesses can take to address this practice, see Verité's [Addressing the Retention of Identity Documents](#).

For an example of a code of conduct developed with worker participation, see [Appendix C: Code of Conduct](#) in the Fair Food Standards Council's 2021 Fair Food Program Report.

For an example of a human rights management system for first mile operations, see the [Assess-And-Address System](#) required under the Rainforest Alliance Sustainable Agriculture Standard.

For a case study of a sugar mill assessing its human rights management systems, see [Pillars in Practice Case Study: Nicaragua](#).

For an example of a company informing all employees of its human rights policy, see [The Coca-Cola Company and Human Rights: What We All Need to Know and Do](#).

## Spanish Language Resources

Verité partnered with the *Alianza Hortofrutícola Internacional para el Fomento de la Responsabilidad Social* (AHIFORES) and the International Labour Organization (ILO) to produce a toolkit on responsible recruitment in the Mexican agricultural sector, including tools on [establishing policies](#) and [selection and evaluation of labor brokers](#).

For a discussion on proper handling of workers' personal data, see [Protección de los datos personales de los trabajadores](#) from the International Labour Organization.

## In-Depth Assessment of Risks & Harms

For an example of root cause analysis of a human rights issue in the agriculture sector, see Verité's [Assessment of Forced Labor Risk in the Cocoa Sector of Côte d'Ivoire](#).

For information on how to conduct risk research and root cause analysis in the banana, cocoa, coffee, cotton, honey, and wine grape sectors, see the [Fairtrade Risk Map](#).

For a tool to identify communities more at risk for child labor in cocoa production, see the International Cocoa Initiative's [Protective Community Index](#).

For information on risks and root causes of forced and child labor in the coffee sector in Latin America, see the [Risk Evaluation for Action in the Coffee Trade \(REACT\) Dashboard](#) by Verité's COFFEE project.

For guidance on root cause analysis of human rights issues, see the [Root Cause Analysis of Labor Violations in the Coffee Sector](#) resource by Verité's COFFEE project.

For examples of self-assessment questionnaires (SAQs) for different actors in a supply chain, see the [SAQ for Coffee Producers](#), and the [SAQ for Labor Brokers](#) by Verité's COFFEE Project.

For a map of child labor and forced labor risks in banana, cocoa, coffee, hazelnut, and tea origins, see Rainforest Alliance's article [Using Risk Maps to Protect Human Rights](#).

## Spanish Language Resources

For a [tool on risk identification](#), see the AHIFORES toolkit on responsible recruitment in the Mexican agricultural sector, produced in partnership with Verité and the ILO.

For information on the experiences of migrant workers in Mexico and the human rights risks they face, see [Violations of Workers Rights in Mexico](#), from the *Red Nacional de Jornaleros y Jornaleras Agrícolas*.

# Further Resources

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## Capability Building in the First Mile

For an example of awareness raising at the first mile level, see the [Awareness-Raising Kit on Child Labour](#) and the [Awareness-Raising Kit on Forced Labour](#), from the International Cocoa Initiative.

For a free online training on the concept of forced labor, see Verité's [Forced Labor E-Learning Course](#).

To understand key considerations in designing human rights training programs for staff and suppliers, see [Guidance on Communication and Training Across the Supply Chain](#), by Verité's COFFEE Project.

For examples of worker awareness-raising materials on how to protect themselves from extreme heat, see The Labor Law Center's [Heat Stress Poster](#) and [OSHA's Work Safely in the Heat \(osha.gov\)](#) and [Prevent Heat Illness at Work \(osha.gov\) posters](#).

For free training modules on child labor and forced labor at farm level, see the [Open-Source Training Modules](#) developed by Verité's COFFEE Project.

For a case study on assessing the training needs of farm workers, see [Training Needs Assessment of Farm Workers in Orange and Sullivan Counties, NY](#), by Cornell University, School of Industrial and Labor Relations.

## Spanish Language Resources

For handouts explaining the symptoms of heat stress and how workers can protect themselves, see [Consejos para Prevenir las Enfermedades Relacionadas con el Calor en el Trabajo](#) and [Planifique con antelación y prepárese](#), from the U.S. Department of Labor.

For awareness-raising materials about the effects of heat stress on worker health, see [Exposición Laboral a Estrés Térmico por Calor y sus Efectos en la Salud. ¿Qué hay que saber?](#) and [¡Peligro ! Altas Temperaturas en el Trabajo, ¿Qué hay que saber?](#), by the Government of Spain.

For training guides on occupational safety and health standards, see the International Labour Organization's [Manual para Formadores: Reglamentación en Materia de Seguridad y Salud en el Trabajo para la Agricultura en México](#) and [Manual para Productores: Reglamentación en Materia de Seguridad y Salud en el Trabajo para la Agricultura en México](#).

For free training modules in Spanish and Portuguese on child labor and forced labor at farm level, see the [Open-Source Training Modules](#) developed by Verité's COFFEE Project.

For guidance on keeping workers safe while handling pesticides, see [Seguridad e Higiene en Los Trabajos Agrícolas](#), from the International Labour Organization.

## Grievance Mechanisms

For several case studies of good practices in the implementation of grievance mechanisms in agricultural operations, see [A Study on the Implementation of Grievance Mechanisms: Reviewing Practice Across RA-Certified Farms and Groups](#), by Ergon Associates.

For a case study on how trade union and farmer representatives, government agencies, and non-governmental stakeholders collaborated on an approach to handling grievances, see Fairtrade's [Enabling Local Solutions to Workplace Disputes: Effective Labour Relations in Peru's Banana Sector](#).

For a free training toolkit on grievance mechanisms for first mile operations, see Rainforest Alliance's [Grievance Mechanism Training Package](#).

# Further Resources

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For examples of sector- and geographic-level, multi-company grievance mechanisms in the coffee sector, see the [Nossa Voz Grievance Mechanism in Brazil](#) and [Promoting Ethical Recruitment in the Coffee Sector of Minas Gerais, Brazil](#), by Verité.

For a discussion of the pros and cons of working with third party providers of grievance mechanisms, see [Using Third Parties to Support the Design and Implementation of Grievance Mechanisms](#), by The Remedy Project.

To understand how to set up effective processes for worker engagement, see the Responsible Sourcing Tool's resource on [Worker Engagement: Enabling Workplace Communication, Worker Agency, and Grievance Management](#).

## Farm Monitoring and Auditing

For a resource on considerations when auditing for child labor, conducting age verification, and interviewing children, see [Comply Chain's Auditing for Child Labor Guide](#), by the U.S. Department of Labor.

For guidance on how to monitor farm labor brokers, see the [Booklet on Monitoring Labor Brokers in the Coffee Supply Chain](#) and [Guidance on Monitoring Labor Brokers](#), by Verité's COFFEE project.

For guidance on how to interview migrant workers as part of monitoring or auditing, see the Responsible Sourcing Tool's [Conducting Migrant Worker Interviews](#).

For sample interview questions for labor brokers as part of monitoring or auditing, see [Labor Broker Interview Questions](#), by Verité's COFFEE project.

To understand how companies and operations can evaluate and benchmark agricultural certification programs, see the Consumer Goods Forum's [Sustainable Supply Chain Initiative \(SSCI\) Benchmark](#) and Rights Co-Lab's [Certification Red Flags](#).

For a tool to assess whether workers have paid recruitment fees, see the Institute for Human Rights and Business's [Questionnaire on Recruitment Fees for Migrant Workers](#) (Appendix A in Responsible Recruitment: Remediating Worker-Paid Recruitment Fees).

For sample farm worker interview questions as part of monitoring or auditing, see [Worker Interview Questions](#), by Verité's COFFEE project.

## Spanish language resources

For specific guidance on monitoring health and safety conditions of agricultural workers, see [Guía para la Vigilancia de la Salud de los Trabajadores del Sector Agrario](#) from the Government of Spain.

For guidance on identifying victims of forced labor in a workplace, see [Anexo 8 Modelo de Cuestionario Aleatorio a Trabajadores](#).

## Remediation of Harms

For examples of remedy provided to children, see the Centre for Child Rights and Business's [1,000 Reports of Child Labour: Lessons, Insights, and Reflections from our Child Labour Remediation Work](#) and the U.S. Department of Labor's [Stakeholder Engagement on the Mate Masie Project](#).

For information and tools related to corrective action planning and remediation in the palm sector, see [Chapter 4: Addressing and Remediating Core Labor Violations](#) in Verité's [Toolkit for Palm Oil Producers on Labor Rights](#).



# Further Resources

To understand how to provide remedy through repayment of recruitment fees, see [Guidance on the Repayment of Worker-Paid Recruitment Fees and Related Costs](#), by the Consumer Goods Forum and AIM-PROGRESS, and [Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs](#), by Impactt.

For an example of a step-by-step approach to response and remedy at operation level, see Rainforest Alliance's [Remediation Protocol](#).

For a tool on how to remediate different child labor scenarios at the first mile level, see [Selecting Support to Prevent and Remediate Child Labour Through a CLMRS](#), from the International Cocoa Initiative.

## Spanish language resources

For a sample format for documenting remediation cases, see Stronger Together's [Anexo 10 Informe Sobre Remedio](#).

For a questionnaire for gathering information from workers, see Stronger Together's [Anexo 8 Modelo de Cuestionario Aleatorio a Trabajadores](#).

