

# Management Protocol for Finding Alerts

Version	Date Modified	Modified By	Date Approved	Approved By	Details
1.0	29/10/20	Policy and Project Officer Program Manager	06/11/20	Program Manager	

**Version 1.0**

**Publish Date 6 November 2020**

This protocol sets out how Fair Farms (Growcom), as the owner of the Fair Farms Training and Certification Program, deals with Finding Alerts identified during Fair Farms Audits.

This document aligns with Section 23.1 and 26.1 of the [Fair Farms Audit Guide](#) Version 1.0 (June 2019), and the Fair Farms Issues Management Protocol.

The steps described in this document are not exhaustive and Fair Farms may undertake further measures as it deems appropriate for particular circumstances.

This procedure will be replaced by amendment to the Fair Farms Audit Guide, in due course.

## PROCEDURE

### **Auditors**

Where an audit reveals a Critical Non-Compliance, the Auditor must alert the Certification Body of the Finding **within one (1) business day** of the audit's completion using the approved form.

### **Certification Body**

Where an audit reveals a Critical Non-Compliance, the Certification Body undertaking the audit must alert the Program Owner (Fair Farms) of the Finding using the Finding Alert Form ([hyperlink](#)). This alert must be sent **within two (2) business day** of the audit's completion.

Completed Finding Alert Forms should be emailed to [fairfarms@growcom.com.au](mailto:fairfarms@growcom.com.au)

### **Program Owner (Fair Farms)**

Fair Farms will notify any Registered Buyers of a Critical Non-Compliance, using the Finding Alert form, **within 1 business day** of receiving the form from a Certification Body. Registered Buyers must nominate a contact to receive Finding Alerts. If a Registered Buyer has not nominated a contact, the default contact known to Fair Farms will be used.

It is important to note that, for Fair Farms to communicate Finding Alerts, Participants must have consented to 'share info' during the registration process for the provision of Fair Farms information with their Registered Buyer. Participants can change this setting through their MyFairFarms dashboard. Instructions [How to Manage Your Registered Buyers](#) are on the Fair Farms website.

Fair Farms will monitor the closing of the Critical Non-Compliance and inform the Registered Buyers.

## FAIR FARMS FINDING ALERT FORM – Guidance for Auditors

The Certification Body providing the audit service must submit a Fair Farms Finding Alert Form for any Finding that is a Critical Non-Compliance. A Critical Non-Compliance is defined as:

- a) Any incident or occurrence that presents a **significant and immediate risk to workers' safety**, risk to their life and limb or constitutes a **significant breach of workers' human rights**; or
- b) An attempt to pervert the course of the Participant's pathway to Fair Farms Certification through fraud, coercion, deception, or interference.

Details of each Finding Alert must be completed on a separate table of the Finding Alert Form. Auditors must not combine separate findings.

Examples of Critical Non-Compliance include, but are not limited to:

- Inconsistencies between different types of documents and worker testimony
- Child labour
- Involuntary, indentured, or involuntary prison labour
- Workers subjected to physical abuse
- Workers subjected to sexual harassment or abuse
- Workers in significant and immediate danger
- Workers not being paid at all
- Union members, union or worker representatives are actively harassed, penalised or discriminated against
- Attempted bribery
- Auditors denied access or obstructed from conducting a proper audit
- Evidence of the deliberate provision of false information to auditors to disguise unfair working conditions
- Premises are not structurally safe
- WHS risks that pose a significant and immediate risk to lives or limbs
- Working excessive hours that pose a direct risk to worker health and safety

The examples above provide guidance on what types of Findings may be classified as a Critical Non-Compliance. The list is not exhaustive and are for guidance only. Auditors should use their discretion when determining a Critical Non-Compliance.

When using the Finding Alert form, auditors should include as much information and evidence as possible to substantiate the Finding. The Finding detail should be sufficient and clear enough that an independent third party could immediately understand what the issue is.

### **Sensitive Information**

When completing a Finding Alert form, auditors should take care to not include any information that could be used to identify specific workers. This information should only be included if absolutely necessary.

Such information may include, but is not limited to names, ID numbers or job descriptions.

### **On Site Behaviour**

If a representative from Fair Farms is physically present at an audit, the auditor should verbally communicate the Finding Alert immediately to the Fair Farms representative.

If an auditor believes they may be at risk by communicating a Finding Alert to the Participant, they should wait until they are removed from the situation before raising the Finding Alert. Auditors should prioritise the welfare of workers when deciding how to inform the Participant of a Finding Alert.

Auditors are expected to act in accordance with the Fair Farms Audit Guide and any other relevant policies and procedures.

### Glossary

<b>Certification Body</b>	The Fair Farms approved audit firm conducting the audit against the Fair Farms Standard.
<b>Critical Non-Compliance</b>	a) Any incident or occurrence that presents a significant and immediate risk to workers' safety, risk to their life and limb or constitutes a significant breach of workers' human rights; or b) An attempt to pervert the course of the Participant's pathway to Fair Farms Certification through fraud, coercion, deception, or interference.
<b>Fair Farms</b>	Business unit of Growcom that is responsible for implementing the Fair Farms Training and Certification Program as scheme owner.
<b>Fair Farms Audit</b>	The audit of a Participant's Controlled Site, undertaken by a Certification Body against the Fair Farms Standard. Includes the initial audit and any subsequent audits.
<b>Fair Farms Management</b>	The unit within Growcom that is responsible for the day-to-day management of the Fair Farms Program.
<b>Finding</b>	A non-compliance with the Fair Farms Standard against which the Site is being audited.
<b>Finding Alert</b>	Any Finding during a Fair Farms Audit that constitutes a Critical Non-Compliance, and which the Certification Body communicates to Fair Farms.
<b>Participant</b>	The legal entity participating in the Fair Farms Program.
<b>Program Owner</b>	Queensland Fruit and Vegetable Growers Ltd trading as Growcom Australia, being the organisation that owns and overall implements the Fair Farms Training and Certification Program, owns the Fair Farms Standard and authorises certification.
<b>Registered Buyer</b>	An organisation that buys produce from a Participant directly or through an intermediary, where a supply relationship has been confirmed via MyFairFarms.

# FINDING ALERT FORM

**PROGRAM USE ONLY – DO NOT FORWARD TO SUPPLIER OR FACILITY**

**Purpose**

This form is for Certification Bodies who provide auditing services to the Fair Farms Training and Certification Program, where a Finding is raised that meets the definition of a Critical Non-Compliance, and a Finding Alert must be issued.

Refs: [Fair Farm Rules](#) 7.7, [Fair Farms Audit Guide](#) 22.1, 23, 26.1

**Directions**

This form should be used in accordance with the Management Protocol for Finding Alert. Where an audit Finding is raised as a Critical Non-Compliance, fill out this form and email it to [fairfarms@growcom.com.au](mailto:fairfarms@growcom.com.au) as soon as practicable (within one (1) business day). Details must be completed for each Finding Alert raised. Do not combine Findings.

## Business Details

**Participant Business Name**

**Trading Name** (if applicable)

**ABN**

**Fair Farms Site ID**

**Site Address**

**Suburb/Town**

**State**

**Postcode**

**Site Contact**

**Certification Body (Auditor)**

**Date of Audit**

**Lead Auditor**

**Lead Auditor APSCA #**

## Details of Finding Alert

Each Finding Alert to be completed on a separate table

**Issue**

**Fair Farms Audit Checklist Reference**

**Fair Farms Standard OR  
Breach of legal requirement**

**Details of Finding**

**Supporting Evidence**

sufficient to explain the situation  
without identifying specific workers

**Employee Response**

if applicable

**Management Response**

if applicable

**Additional Details & Comments**