

**Fair Farms Audit Guide – log of changes to V.1 of Audit Guide**

Section	Change	New Section	Reason
Introduction	Substitute the word “Fairs” for “Farms” where it appears in the third paragraph.	N/A	Corrects a typographical error.
2. Auditor Requirements	<p>In subparagraph 2.1 delete the words “be current members of the APSCA (Association of Professional Social Compliance Auditors) at the time of the audit. This applies to any member of the audit team, whether directly employed or contracted” and substitute the text “meet the competency requirements set out in the Fair Farms Auditor/Reviewer Competency Framework as amended from time to time.”</p> <p>Delete subparagraphs 2.2 to 2.5</p>	N/A	Fair Farms has developed a stand alone Auditor Competency Framework that retains the requirement for APSCA membership but otherwise gives more flexibility as to the qualifications and experience required of auditors.

8. Opening Meeting Checklist	<p>At subparagraph 8.4 after the words “Confirm confidentiality of audit report and findings and” add the text “that report and findings will be provided by Fair Farms to nominated Registered Buyers where such authorisation has been provided.”</p> <p>Insert a new subparagraph 8.5 including the text from 8.4 that reads “Request permission for photographs to be taken as part of audit (provided they are not commercially sensitive or identify individuals).”</p> <p>Renumber the remaining sub paragraphs.</p>	N/A	Consistency with changes to Rules and with Fair Farms Privacy Policy
11. Worker Interviews	Add a new sub paragraph 11.10 with the text “As a guide, worker interviews should take no less than 15 minutes.”	11.10	Provides auditors with some guidance as to the expected length of worker interviews.
13. Translators	At sub paragraph 13.4 delete the word “facility” and substitute with “Participant”.	N/A	Consistency of terminology
15. Interview Conduct	At sub paragraph 15.5.2 add an “s” to the word “question”.	N/A	Corrects typographical error
16. Interviewee Confidentiality	At subparagraph 16.4 following the words “Where the Auditor has real concerns” substitute the words “for the physical safety of” with “ about the possible adverse treatment of “	N/A	The change broadens the scope of those circumstances where an auditor may wish to seek guidance about possible adverse treatment of workers.
18. Testing Methodology	Delete the word “Excluded” where it appears in the last dot point of subparagraph 18.1	N/A	Corrects a typographical error.

19. Management Interview	Add an “s” to the word “give” where it appears in the second sentence of subparagraph 19.1 and delete the word “the” between the words “gives” and “management”	N/A	Corrects grammar and typographical error
21. Closing Meeting	At the end of subparagraph 21.6 add the following text “Acknowledgement of the Findings by electronic means is acceptable.”	N/A	Allows auditors to email the findings to the Participant and obtain an email acknowledgement.
23. Finding Alert	<p>At subparagraph 23.1 delete the words “and Registered Buyers” where it appears in the first sentence.</p> <p>Add the following text as new subparagraphs 23.2 to 23.7:</p> <p>“23.2 The auditor must communicate any Finding Alerts within one (1) business day and the Certification Body must communicate any Finding Alerts to the Scheme Owner Fair Farms within two (2) business days of receipt of the Finding Alert from the auditor.</p> <p>23.3 Finding Alerts should be communicated using the Finding Alert Form and emailed to admin@fairfarms.com.au.</p> <p>23.4 The Scheme Owner will communicate any Finding Alerts to Registered Buyers nominated by the Participant provided they have consented to sharing that information.</p> <p>23.5 The Scheme Owner will monitor the closing of the Critical Non-compliance the subject of the Finding Alert and inform Registered Buyers</p> <p>23.6 Examples of Critical Non-compliance that would warrant a Finding Alert include but are not limited to:</p>	23.2 to 23.7	Changes reflect the content of the Finding Alert Protocol that was introduced with Version 2 of the Audit Checklist and was developed by Fair Farms to provide auditor guidance

	<p>23.6.1 Child labour  23.6.2 Workers subjected to physical abuse or sexual harassment  23.6.3 Workers exposed to a serious or imminent threat to their health and safety  23.6.4 Significant underpayment or non-payment of wages  23.6.5 Worker representatives being subjected to adverse action  23.6.6 Involuntary or bonded labour  23.6.7 Attempted bribery  23.6.8 Denial of access or obstruction during audit</p> <p>23.7 The examples above are for guidance only and auditors should use their discretion when determining a Critical Non-compliance.”</p>		
25. Clearing Findings	Replace the word “Sites” and “Site” with the word “Participant” or Participants as the context requires (except for the first sentence in subparagraph 25.2).	N/A	Consistency of terminology.
26. Timings	<p>Delete subparagraph 26.1.</p> <p>Re-number the section.</p> <p>At the new subparagraph 26.3 delete the word “Client’s” and substitute with “Participant’s”</p> <p>At the new subparagraph 26.3 and 26.4 substitute the word “working’ with “business” .</p>	N/A	<p>26.1 not required given the substantial amendments to section 23.</p> <p>Consistency of terminology and clarity.</p>

	At the new subparagraph 26.5 substitute the word “Working” for “Business”, delete the words “is defined bas per QLD legislation” and substitute with “do not include weekends and public holidays” .		
27. Disputes	Substitute the word “client” and “site” for “Participant” in each subparagraph wherever appearing.	N/A	Consistency of terminology
28. Remote Provision of Audit Evidence	<p>Insert a new section 28 headed “Remote Provision of Audit Evidence” as follows:</p> <p>“Where Fair Farms and a Certification Body have agreed a protocol, some audit evidence may be provided by a Participant to a Certifying Body prior to the agreed audit date. Documents such as time and wages records, payslips, policies and procedures, records of training or induction may be supplied in advance of an audit to increase efficiency but the provision of some evidence by remote means can only supplement an on-site audit.”</p> <p>Renumber the following section.</p>	28.	Allows for remote provision of some audit evidence but does not replace the requirement for an auditor to attend in person.
29. Glossary of Terms	<p>“Agency Labour” – Substitute the word “Site” for “Participating Business Unit” where it appears before the words “but who is supplied”.</p> <p>“Certification Body” – Substitute the word “Site” for “Participant” where it appears in the definition.</p> <p>“Finding Alert” – Delete the words “and Registered Buyers”.</p>		<p>Consistency of terminology</p> <p>Consistency of terminology</p> <p>Reflects amendments to section 23</p>

	<p>“Management”</p> <p>Substitute the word “Site” for “Participant” where it first appears. Substitute the word “sites” for “Participants business”, delete the words “and who are responsible for the implementation and maintenance of the control environment”</p> <p>“Scheme Owner”</p> <p>Delete the word “overall”, add the text “and” following the word “Program” and delete the words “owns the Fair Farms” where they appear before the word “Standard”.</p> <p>“Site”</p> <p>Delete the sentence that reads “Each separate production site must have its own audit report.”</p>		<p>Clarity, consistency of terminology.</p> <p>Simplification</p> <p>A separate audit report is not required for each production site unless it is operated by a different legal entity.</p>
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