

GLOBALG.A.P. Risk Assessment on Social Practice (GRASP)

GRASP PRINCIPLES AND CRITERIA FOR FAMILY FARMS – APPLICATION RULES

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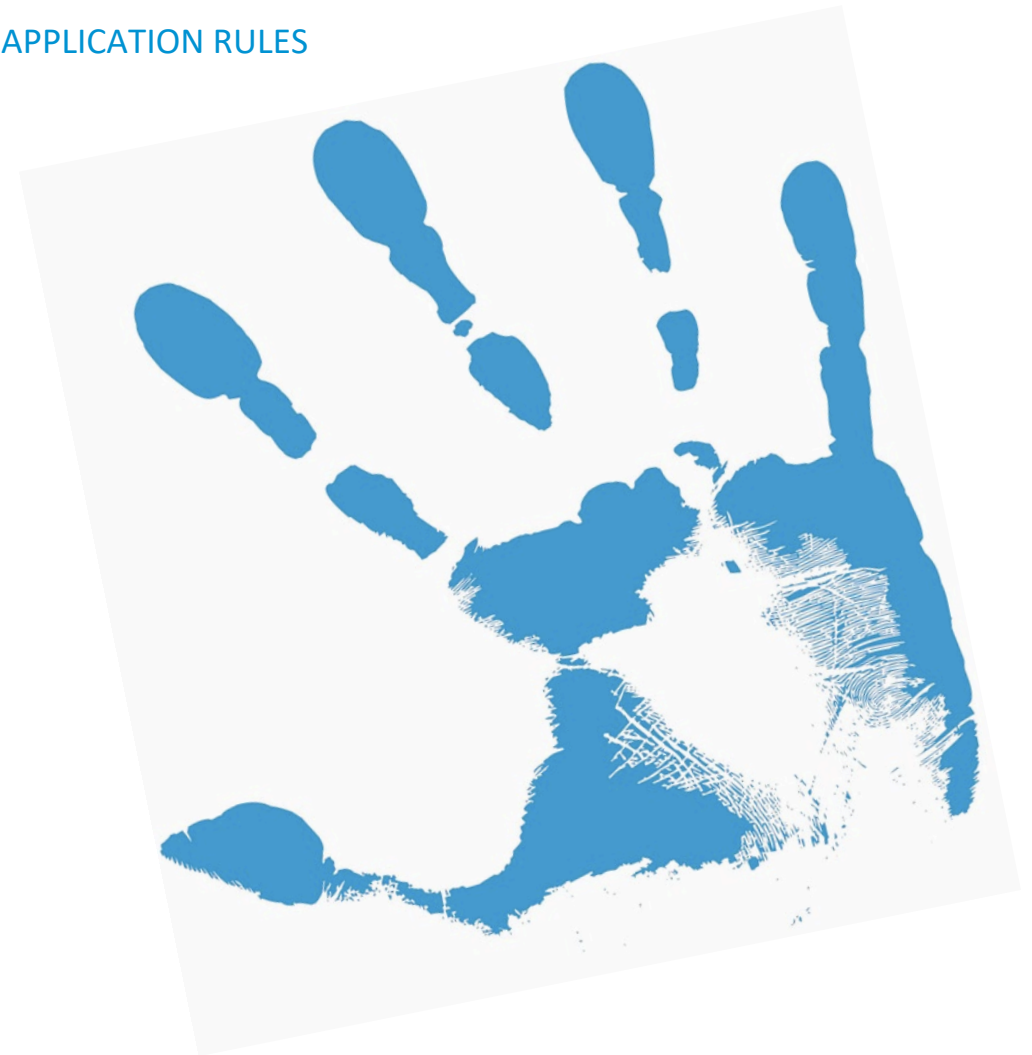


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INTRODUCTION

Definition: A family farm is a farm that is run as a family's core business by the *core family members that live in the same household*. Core family members are defined as: parents, spouses, siblings, and children. It does not include aunts/uncles, cousins, or other relatives.

The objective of these rules is to facilitate the application of the GRASP principles and criteria (P&Cs) to producers who are family farms. This document will explain how some of the concepts will need to be applied, based on the family farm nature.

N°	Principle	Criteria	Level	Application rules
G	GENERAL			
G1	The producer informs the workers of the GRASP assessment and its scope at least two working days before the date of assessment.	<p>The term “inform” shall require the producer to include reference to the key areas of the standards.</p> <p>The term “GRASP scope” shall require the producer to provide workers with/remind workers of where to access the producer’s human rights policy and/or NIG. These requirements shall also cover any subcontracted labor. For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Exception: For unannounced assessments, this P&C shall be considered compliant.</p> <p>Evidence: The assessor shall check documental evidence and, where interviews are possible, cross-check such documental evidence with workers testimony of the workers and worker representation.</p>	Minor Must	<p>For family farms: In G1, the term "workers" refers to core family members helping on the farm (see definition in the GRASP glossary).</p> <p>Producer groups with family farms as producer group members shall provide the notice to all family farm producer group members as part of their system to communicate GRASP issues in the QMS</p>
G2	The producer provides a register of any/all workers hired and those present on the date of the assessment.	<p>The register is only a reference to be used by the assessor and not to be kept. Once the assessment is completed, the assessor shall return the register to the producer without keeping copies.</p> <p>The register shall include all workers of the current (calendar/seasonal) year or at least those hired since the last assessment.</p>	Minor Must	<p>For family farms: In G2, the term "workers" refers to core family members helping on the farm (see definition in the GRASP glossary).</p> <p>If family farms have core family members helping on them and these family members also have their own family core members (e.g.,</p>

N°	Principle	Criteria	Level	Application rules
		<p>Use of subcontracted labor, prison labor, and/or family labor shall be clearly indicated. For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Evidence: The register shall contain information (excepting information not legally allowed to be included) on the type of contract, migratory status, date of birth, date of hire, and date of dismissal, as applicable. The producer shall provide verification of all workers present on the date of the assessment.</p>		<p>a father and son, and the son has children and they all help on the same family farm), the main family that is the certificate holder shall provide a record of the various core family members and group them by family.</p> <p>Record: may be a written document or the testimony of the producer indicating who helps on the farm and their relationships to each other.</p> <p>That relationship shall be cross-checked through simple questions to the persons present on the date of the assessment by the assessor.</p> <p>The assessor shall verify the type of contract of all persons other than core family members. If such persons, other than core family members workers were employed or hired (as per the concept of worker in GRASP), the assessment shall proceed using the full GRASP checklist (the checklist with all P&Cs) and all P&Cs shall be verified.</p> <p>The assessor shall communicate immediately this to the producer and proceed with the full assessment of GRASP</p>

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				<p>The assessor shall cross-check with information from the Integrated Farm Assurance (IFA) audit, (specially the criteria on workers' health and safety), regarding information indicating that other than core family members have provided help to the producer.</p> <p>Producer groups shall maintain records on the producer group members that operate as family farms.</p>
G3	The producer/producer group completes a minimum of one self-assessment/internal GRASP assessment annually.	<p>There shall be documented evidence available that a self-assessment/an internal GRASP assessment has been completed under the responsibility of the producer/producer group (this may be carried out by a person other than the producer). The self-assessment/internal GRASP assessment shall have been completed before the CB external assessment and during the time with the highest presence of workers at the farm and when agricultural activities are taking place. For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Evidence: Self-assessments/internal GRASP assessment shall include all applicable P&Cs, even if the relevant tasks are carried out by a subcontracted company/labor.</p>	Major Must	

N°	Principle	Criteria	Level	Application rules
		The self-assessment/internal GRASP assessment checklist shall contain comments on the evidence observed for all non-applicable and non-compliant P&Cs.		
G4	Effective corrective actions are taken to address all non-compliant Major Musts and at least a percentage of Minor Musts detected during the self-assessment/internal GRASP assessment.	<p>Before or at the beginning of the assessment, any corrective actions shall be documented. The assessor shall include comments in the assessment report wherever deviations are found between the current assessment and the self-assessment/internal GRASP assessment.</p> <p>Evidence: Any changes necessary as part of the corrective actions shall have been implemented.</p> <p>Compliance is achieved when zero non-conformances are detected during the self-assessment/internal GRASP assessment or if all non-conformances detected during the self-assessment/internal GRASP assessment have been resolved before the CB assessment.</p>	Minor Must	
1	RIGHT OF ASSOCIATION AND REPRESENTATION – N/A			
2	GRASP WORKER REPRESENTATION – N/A			
3	COMPLAINT PROCESS – N/A			

N°	Principle	Criteria	Level	Application rules
4	PRODUCER’S HUMAN RIGHTS POLICIES – 4.2–4.5 N/A			
4.1	The producer has and complies with a policy on the protection of human rights, acknowledging the rights in the ILO Core Labour Conventions and against any form of forced labor, corruption, corporal punishment, harassment or abuse, and discrimination and supporting good labor conditions, social practices, and human rights for all workers.	<p>The producer’s human rights policy shall indicate that, at minimum:</p> <ol style="list-style-type: none"> 1. The producer follows all local laws and regulations. 2. The producer respects the workers’ rights included in the ILO Core Labour Conventions. 3. The producer commits to respecting human rights as indicated in the UN Guiding Principles on Business and Human Rights. 4. The producer avoids and does not engage in, support, or tolerate discrimination in employment practices. 5. The producer does not support or tolerate the use of or threats of corporal punishment, mental or physical coercion, bullying, harassment, or abuse of any kind. 6. The producer checks that no worker is held in debt bondage or forced to work for an employer, labor recruiter, or other entity to pay off debt. 7. The producer prohibits any involvement in any act of corruption, extortion, embezzlement, as well as in any form of bribery, whether directly or indirectly. <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p>	Major Must	

N°	Principle	Criteria	Level	Application rules
		<ul style="list-style-type: none"> - The policy's acknowledgement of the rights included in the ILO Core Labour Conventions shall explicitly include the following conventions and their accompanying recommendations (even if they have not been ratified by the government): 29 and 105 and Recommendation 35 (Forced and Bonded Labor), 87 (Freedom of Association), 98 (Right to Organize and Collective Bargaining), 100 and 111 and Recommendations 90 and 111 (Equal Remuneration for Male and Female Workers for Work of Equal Value; Discrimination in Employment and Occupation), 138 and Recommendation 146 (Minimum Age), 182 and Recommendation 190 (Worst Forms of Child Labor), 81 (Labor Inspection), 122 (Employment Policy). - The policy shall demonstrate an understanding that the UN Guiding Principles on Business and Human Rights refer to dignity, fairness, equality, respect, and independence. - The policy shall entitle any worker to file complaints on any violation of this declaration using a confidential complaint process without fear of retaliation and have those complaints resolved in a timely manner. - After communicating this policy, the producer shall expect full compliance with the same commitments from any agriculture labor subcontractor while being a business partner. 		

N°	Principle	Criteria	Level	Application rules
		<p>- The producer shall accept that if a GRASP assessment verification shows any violation of this policy, this shall be considered a non-compliance with this P&C.</p> <p>Evidence: The assessor shall verify the existence of the policy and shall check whether any non-compliance during assessment violates any of the above objectives. The assessor shall then comment and score those criteria as non-compliance in this P&C as well. For producer groups, the policy can be developed at group level, but compliance shall be checked at producer group member level.</p>		
5	ACCESS TO LABOR REGULATION INFORMATION – N/A			
6	TERMS OF EMPLOYMENT DOCUMENTS AND FORCED LABOR INDICATORS – 6.2–6.9 N/A			
6.1	All workers are legally eligible to work at the production site and on the activities assigned.	For each worker, the producer shall have information on their legal eligibility to work and a verification process or method to assess this eligibility including, e.g., working permits (when required for nonnationals), legal minimum age of employment (for young workers), parental consent for workers at legal minimum age of employment (when required by law), residency permits, working cards, or other documents with relevant information.	Major Must	<p>For family farms: The term "workers" refers to core family members helping on the farm (see definition in the GRASP glossary).</p> <p>The assessor shall verify this P&C together with P&Cs 10.1, and G2.</p> <p>For family farms, "having information on legal</p>

N°	Principle	Criteria	Level	Application rules
		<p>For family farms without hired workers, “workers” shall refer to core family members working on the farm. Any ID, permit, or document to verify this condition shall always be returned to the worker immediately. For subcontracted agricultural labor, the producer shall have requested a list of workers indicating that each worker’s eligibility was checked by the direct employer (e.g., by permit, by passport, by ID, etc.).</p> <p>Evidence: The assessor shall check the validity of the evidence used and cross-check with the worker in the interview where possible. If no interviews are possible, the assessor shall check the relevant documents. If the verification process is not documented, a detailed verbal explanation by the producer shall be required, together with some documental evidence. The assessor shall request and check subcontracted labor information on this P&C.</p>		<p>eligibility” requires the producer to verify the legal status of the core family member to help in the farm and shall provide evidence that can be cross-checked by the assessor. E.g., when testimony is provided by the producer, documents shall be used to verify what was indicated (residence permit, official ID, etc.). All the persons shall be core family members, related among themselves (from one family) and comply with the definition of core family members in the GRASP glossary.</p> <p>Ensure that core family members helping do not receive payment in the form of wages, a salary, or any other form. Ensure that there are no violations of any local regulations with regards to these core family members helping on the farm (e.g., permits, government authorizations, formal declarations, or others) or related to their working conditions (houses or areas of work at least comply with the local requirements and/or the requirements in the IFA standard.)</p>
7	PAYMENTS – N/A			
8	WAGES – N/A			

N°	Principle	Criteria	Level	Application rules
9	WORKING AGE, CHILD LABOR, AND YOUNG WORKERS			
9.1	<p>The producer verifies that no worker below the legal minimum age of employment or the age of completion of compulsory education (whichever provides the highest protection) is working at the production sites.</p> <p>The minimum age of employment shall not be less than 15 years and 13 for light work.</p> <p>For countries exempt from ILO Convention 138, the minimum age of employment shall not be less than 14 and 12 for light work.</p>	<p>The term “verifies” requires that the producer shall have a verification process or method for checking this information about the workers, including employment agency/subcontracted workers (e.g., checking worker ID, working permit, working registration card, trade union membership card, etc.) and filing a copy. A verbal explanation of the verification process or method shall be sufficient together with documental evidence.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>The “production site” shall include any site within the scope of the GRASP assessment and IFA or equivalent standard audit.</p> <p>For service providers or short-term visitors providing production-related activities as defined by IFA, the producer shall verify company ID, personal ID, working permit, working registration card, picture ID when available, etc.</p> <p>The producer shall apply the verification procedure to any person providing work, services, or any activity related to production at the production site or subcontracted sites. The absence of a terms of employment document does not eliminate the obligation to comply with</p>	Major Must	<p>For family farms: The term "workers" refers to core family members helping on the farm (see definition in the GRASP glossary).</p> <p>This P&C shall be applied to allow the assessor to verify the age of all core family members on the farm and identify their activities on the farm. This can be done using the testimony of parents and/or guardians. If the testimony of guardians is used, then documental evidence of their appointment shall be provided to the assessor as part of compliance with this P&C. The assessor shall evaluate whether activities are age- and gender-appropriate based on the risk level of the activity (information can be derived from the risk analysis on workers' health and safety) according to the IFA standard.</p>

N°	Principle	Criteria	Level	Application rules
		<p>this P&C. In these cases, the producer shall ensure that no persons below the legal minimum age of employment are involved in any working activity unless those allowed to family members in family core business farms. “Light work”: age-appropriate tasks that are of lower risk and do not interfere with a child’s schooling and leisure time and do not adversely impact health, safety, and development of the minor.</p> <p>If the age of completion of compulsory education is higher than the legal minimum age of employment, the assessor shall check that the work tasks do not interfere with schooling (e.g., minors are enrolled in and attend school, work schedules allow getting to school, teachers are available at the farm, etc.). Any official school/university, government, industry, or trade union program that supervises development of apprenticeships (e.g., traineeship, internship, workplace learning, etc.) shall be documented. Documentation shall include at least the participants’ names, ages, conditions, hours, and parental consents.</p> <p>Evidence: The assessor shall check the validity of the documental evidence (producer shall provide documents, procedures, and official regulations during assessment) and cross-</p>		

N°	Principle	Criteria	Level	Application rules
		<p>check with the relevant worker in the interview where possible. If no interviews are possible, the assessor shall use document review to check compliance with this P&C. If the verification process is not documented, a detailed verbal explanation by the producer shall be required, together with some documental evidence. The assessor shall check applicable national interpretation guidelines for the age of compulsory schooling completion and the legal minimum age of employment in the country or find information before the assessment, including defined exceptions in the local laws different from the final minimum age established in the criteria and ILO Conventions. The assessor shall comment findings in the report, indicating data used as the legal minimum age of employment and age of workers, to confirm these criteria. The assessor shall request and check subcontracted labor information on this P&C.</p>		
9.2	The producer checks that no worker under the age of 18 is engaged in night work or tasks that are hazardous in nature in any production site.	The term “checks” requires that the producer shall identify all workers below the age of 18 and verify that their tasks are not performed at night and are not of a hazardous nature. For family farms without hired workers, “workers” shall refer to core family members working on the farm.	Major Must	For family farms: The term "workers" refers to core family members helping on the farm (see definition in GRASP glossary).

N°	Principle	Criteria	Level	Application rules
		<p>“Light work”: age-appropriate tasks that are of lower risk and do not interfere with a child’s schooling and leisure time and do not adversely impact health, safety, and development of the minor.</p> <p>The assessor shall check the age of completion of compulsory education.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that there is no worker below the age of 18. The producer shall provide documents, procedures, and official regulations for review by the assessor.</p> <p>If not indicated in the NIG or by local law, hazardous conditions are those defined as such in the ILO Convention, or any conditions that could be dangerous to the young workers’ health and safety according to the applicable IFA topic “workers’ well-being” or local regulations. Also considered hazardous are any conditions that jeopardize young workers’ development or prevent them from finishing their compulsory school education.</p> <p>Evidence shall include the record of working hours, which should be confirmed by the workers interview, including the confirmation of the nonhazardous nature of the work during the worker interview, where possible, and employment contract review.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		

N°	Principle	Criteria	Level	Application rules
9.3	Children on family farms shall be employed only by their core family under conditions that support their protection, right to education, and safety.	<p>The term “conditions that support their protection, right to education, and safety” is defined as follows: Persons below the legal minimum age of employment working on their family’s farm, shall at least work under the following conditions:</p> <ol style="list-style-type: none"> 1. The minors are under direct supervision of their parents or guardians. 2. Their work is done on their own family farms. 3. The work tasks do not interfere with schooling (i.e., minors are enrolled in and attend school). 4. The work is not at night or hazardous in nature. 5. The work consists of age-appropriate tasks that are of lower risk. 6. The hours of work are monitored (reported) to be less than those of workers at or above the legal working age, including hours spent in household chores (e.g., cleaning, cooking, childcare, collecting water and firewood). 7. Parents or guardians declare these conditions in a written self-statement, which is kept on file by the producer and that must be reviewed and cross-checked on site during GRASP assessment. 	Major Must	<p>The assessor shall cross-check all the information with other core family members if it has been provided directly by the producer.</p> <p>If the information has been provided by a guardian, documental evidence (official documentation provided by a government) shall be submitted to support the guardian’s appointment.</p> <p>The assessor shall comment on compliance with each of the aspects checked under this P&C.</p>

N°	Principle	Criteria	Level	Application rules
		<p>Evidence: Compliance shall be granted if the assessor has verified that no children (minors under the legal minimum age of employment) are employed or living at the farm. The assessor shall check that no children worked at the farm.</p> <p>Not accepted only with the indication of the producer. The assessor shall check each of the above conditions with the producer and provide comments in each of them when children are workers.</p> <p>For Option 2 producer groups, these conditions shall be monitored as a procedure in the GRASP QMS audit and evaluated in the internal GRASP assessment. The producer shall show the results of each of the procedures above to the assessor.</p> <p>If not defined in the NIG or by local law, hazardous conditions are those defined as such in the ILO Convention, or any conditions that could be dangerous to the young workers' health and safety according to the applicable IFA topic "workers' well-being" or local regulations. Also considered hazardous are any conditions that jeopardize young workers' development or prevent them from finishing their compulsory school education.</p> <p>The assessor shall check the record of working hours and cross-check its contents in the workers (children or guardians) interview,</p>		

N°	Principle	Criteria	Level	Application rules
		<p>where possible, including the confirmation of the nonhazardous nature of the work during worker interview.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		
9.4	Supervisory staff has been informed of the legal requirements on working age and of the effective remediation plan (when workers under the age 18 are found working in non-compliance).	<p>The term “supervisory staff” shall refer to any staff member in contact with workers or with supervising duties at the production site (e.g., foreman, manager, crew supervisor, etc.). If the producer does not have such staff, the producer shall have knowledge of the GRASP criteria on this topic and shall have a remediation plan.</p> <p>There shall be a documented remediation plan for potential non-compliances of all the P&Cs in this section. Compliance without a remediation plan shall be possible only if no workers are under the age of 18. For Option 2 producer groups, compliance without a remediation plan shall be possible only if there are no family farms among the producer group members and/or none of the producer group members have workers under the age of 18.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>The remediation plan shall, at minimum, include written details on how the children will be removed from the workplace and replaced</p>	Minor Must	<p>The terms "legal requirements on working age" and “effective remediation plan” refer to the producer and any other core family member in a position to direct activities on the farm being aware of the hours worked by the core family members providing help and the provision of a reduced schedule for minors. It shall be possible for family members to take breaks and for minors to have time for rest and recreation. Measures shall be in place to reduce work risks and avoid hazardous activities to minors and young family members providing help.</p> <p>The terms also include the producer’s awareness of any tasks, activity or practice within the farm that can lead to the risk of child labor and forced labor as indicated in P&C 4.1 (e.g., not allowing that children tasks are so many that children do to have enough rest time, ability to move, play or freely (under parents supervision) to have leisure time.</p> <p>The remediation plan shall focus on measures that guarantee the protection of the core family</p>

N°	Principle	Criteria	Level	Application rules
		<p>and how the organization is preventing every individual child from entering worse forms of child labor (including hazardous work, slavery-like practices, recruitment into armed conflict, sex work, labor trafficking, and/or illicit activities).</p> <p>In case of non-compliances with P&Cs under this section, immediate remedy for children or young workers shall be provided (i.e., removal from situation). For young workers, in addition to the removal, there shall be assurance of future remediation actions (included in the plan) securing access to adequate work and wages (if applicable). This shall be applicable to family farms accordingly.</p> <p>Evidence: The plan and follow-up actions shall be documented by the producer and verified by the assessor.</p> <p>For Option 2 producer groups, the plan can be developed at QMS level.</p> <p>The assessor shall check on producer group member level that each producer is aware and has knowledge of the plan (i.e., the plan is available at the production site and staff have been instructed). Documental evidence of the type of information with evidence of participation of the supervisory staff shall be required.</p>		<p>members in case of any non-compliances discovered by the assessor This shall include:</p> <ol style="list-style-type: none"> 1. How the core family members will be removed from the risky situation or the workplace 2. Action to avoid the non-compliance in the future <p>This remediation plan may be presented in a document or a verbal explanation.</p> <p>For Option 2 producer groups with family farms as producer group members, compliance with this P&C can be supported with activities performed by the producer group management and shall be verified during the QMS audit and internal assessment and cross-checked with the audit sample.</p>
10	COMPULSORY SCHOOL AGE AND SCHOOL ACCESS			

N°	Principle	Criteria	Level	Application rules
10.1	Any children at compulsory school age living or working on any production sites shall have access to school education.	<p>The term “any children” shall include children legally working (i.e., children on family farms, children at legal age of employment, etc.), children of workers and of supervisory staff (including the owner, operator, etc.).</p> <p>If the age of compulsory school completion is higher than the set legal minimum age of employment and children below the age of compulsory school completion are hired, the producer shall guarantee that any worker below the age of completion of compulsory school shall have access to school education. The term “access to school education” shall require that children have the possibility to enroll in and attend school (i.e., school is reachable within a reasonable distance, school route is safe, etc.).</p> <p>The producer shall instruct workers who are parents or guardians of children living at the production site or of employed children below the age of completion of compulsory school about the possibilities of access to school education in the area. It is understood that parents/guardians are responsible for enforcing attendance at school. This shall be applicable to family farms accordingly.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that no children at/below compulsory school age are living or</p>	Major Must	

N°	Principle	Criteria	Level	Application rules
		<p>working on any production sites. In all other cases, the assessor shall verify compliance with the requirements of the PC criteria. The assessor shall check verbal and documental evidence from the producer. The assessor shall cross-check information with interviews where possible.</p>		
10.2	<p>The producer verifies and keeps records with the full name, name of parents, and date of birth of all children at the production sites who are below the age of completion of compulsory schooling.</p>	<p>The term “verifies and keeps records” requires that the producer shall have a verification process or method (e.g., checking worker ID, working permit, working registration card, trade union membership card, etc., and keeping a copy on file) to verify the information. This shall be applicable to family farms accordingly.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that no children at/below compulsory school age are living or working on any production site. In all other cases, the assessor shall verify compliance with these criteria. For family farms without hired workers, the producer shall provide testimony in the form of documents and this shall be cross-checked with other core family members where possible.</p> <p>The producer shall provide this information to the assessor at the beginning of the assessment (e.g., list of workers, list with files and documents, etc.).</p>	Minor Must	<p>For family farms:</p> <p>This P&C relates to P&C G2 and both P&Cs shall be cross-checked with each other. If family farms have core family members helping on them and these family members also have their own core family members, (e.g., father and son, and the son has children and they all help on the same family farm), the main family that is the certificate holder shall provide a record of the various core family members and group them by family.</p> <p>For Option 2 producer groups with family farms as producer group members, this verification shall also be enforced during the QMS audit and internal assessment.</p>

N°	Principle	Criteria	Level	Application rules
		<p>The assessor shall cross-check the list by including in the interview sample of workers at least some workers with listed children.</p>		
10.3	<p>If access to a school is not possible, the producer facilitates transport for children below the age of completion of compulsory schooling.</p>	<p>The term “access to a school is not possible” shall cover situations in which children have no possibility to enroll in and cannot attend school (e.g., school is not reachable by walking an age-appropriate distance without compromising the children’ health or safety, the school route is not safe, etc.).</p> <p>The term “facilitates transport” shall require the producer to request public transport from local authorities, provide private transportation, or subsidize transportation as necessary to ensure that children can easily get to school. This shall be applicable to family farms accordingly. For family farms without hired workers, family income limitations may be considered by the assessor when assessing compliance with these criteria.</p> <p>Evidence: Compliance shall be granted when the assessor verifies that no children at/below compulsory school age are living or working on any production site. In all other cases, the assessor shall verify compliance with these criteria. The assessor shall check, e.g., documented inspections of the transportation and records of trips and shall cross-check the</p>	Major Must	<p>For family farms: The assessor shall verify that adequate considerations (taking into account the financial, cultural and resources availability of the producer) have been taken by the family farm in order to provide access to school to children under the compulsory age of school completion. This can be verified through documental or testimonial evidence and cross-checked with other core family members.</p> <p>For Option 2 producer groups with family farms as producer group members, compliance with this P&C can be supported with activities performed by the producer group management and shall be verified during the QMS audit and internal assessment and cross-checked with the audit sample.</p>

N°	Principle	Criteria	Level	Application rules
		information in interviews with workers with listed children, when interviews are possible.		
10.4	If schools are not available for children living and/or employed on the production sites who are below the age of compulsory school completion, the producer facilitates on-site schooling.	<p>The term “facilitates on-site schooling” shall include, e.g., requests to local authorities for teachers to come onto the production site, providing possibilities for teachers to come onto the production site, subsidizing teachers to come onto the production site, etc. This shall be applicable to family farms accordingly.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that no children at/below compulsory school age are living or working on any production sites. In all other cases, the assessor shall verify compliance with these criteria. The assessor shall check if schools are available before the assessment. The assessor shall then inspect the premises and check documental evidence and verbal explanation from producer, i.e., documented inspections of the transportation, record of trips, interviews with workers with listed children, where interviews are possible.</p>	Major Must	<p>For family farms: The assessor shall verify that adequate considerations (taking into account the financial, cultural and resources availability of the producer) have been taken by the family farm in order to provide access to school to children under the compulsory age of school completion. This can be verified through documental or testimonial evidence and cross-checked with other core family members.:</p> <p>For Option 2 producer groups with family farms as producer group members, compliance with this P&C can be supported with activities performed by the producer group management and shall be verified during the internal QMS audit and internal assessment and cross-checked with the audit sample.</p>
11	TIME RECORDING SYSTEMS – N/A			
12	WORKING HOURS – N/A			
13	DISCIPLINARY PROCEDURES – N/A			

N°	Principle	Criteria	Level	Application rules
14	GRASP QMS			
14.1	The assessment of the producer group's GRASP QMS shows evidence of the correct implementation of GRASP for all participating producer group members.	Compliance with this P&C shall require that all the following have been checked and reported compliant: <ol style="list-style-type: none"> 1. The implementation of GRASP is included in the GRASP QMS of the producer group, based on the "GLOBALG.A.P. general regulations – Rules for producer groups and multisite producers with QMS." 2. There is a system in place to regularly inform and train key staff of each producer group member on GRASP-related P&Cs, topics, and issues (e.g., train supervisory staff on remediation plan for child labor). 3. All steps taken in the frame of the QMS to implement GRASP among all participating producer group members are documented. 4. There is evidence that the producer group fosters compliance of all participating producer group members with the GRASP requirements and assesses the progresses and problems complying with GRASP every year. 5. A register is maintained of all producers with GLOBALG.A.P. certified production processes implementing GRASP. For every producer group member, it contains the internal assessment date as well as the 	Major Must	Evidence: The assessor shall check each of the GRASP QMS requirements during the IFA CB QMS audit. The assessor shall request documental evidence and cross-check with related P&Cs during the producer group members' external assessments (i.e., training and information related to the remediation plan for child labor at producer group member level). Documental evidence of meetings and interviews with producer group members regarding the revision of progress shall be included. The procedure to implement corrective actions shall relate to the existence of the internal GRASP assessment and corrective actions of the producer group member.

N°	Principle	Criteria	Level	Application rules
		<p>compliance level reached, all non-compliances detected in internal and external assessments, and corrective actions following non-compliances.</p> <p>6. There is a procedure to implement corrective actions resulting from previous internal assessments for all the producer group members.</p> <p>7. There is evidence of application of the procedure to implement corrective actions resulting from previous internal assessments for all producer group members.</p> <p>8. The internal producer group auditor is qualified according to the GRASP general rules.</p>		