

# SELF-ASSESSMENT FOR UNGP ALIGNMENT

## Introduction

Child labour can happen throughout agricultural supply chains. Establishing a due diligence process that integrates the respect for human rights throughout the supply chain is key to prevent this risk. According to the global minimum standard on business and human rights, the UN Guiding Principles on Businesses and Human Rights, businesses are responsible for managing their adverse impacts on child labour in their own organisation and within their relationships. Managing child labour risks within the agricultural supply chain in alignment with the UNGPs means continuously assessing potential and actual adverse impacts within a business's own operations and its relationships as well as putting into place measures to cease, prevent, mitigate and remedy potential and actual impacts.

For businesses this takes the form of

- a human rights policy commitment
- a continuous due diligence process
- access to remedy

Many companies have already taken concrete steps to align their business practices with the UNGPs and more will follow with the increased legislation on Human Rights Due Diligence.

## What is the UNGP self-assessment tool?

This assessment tool helps organisations get an overview of how existing business practices already align with the UNGPs and where there are gaps.

This tool provides a template for businesses and other actors to assess themselves against the principles in the UNGPs. It is aligned with the OECD Guidelines for MNEs and the ECLT Member Pledge of Commitment and Minimum Standards. Regardless of how far along an organisation is in implementing the UNGPs, this assessment can help establish an overview of gaps and opportunities, enabling the development of a targeted action plans for further alignment. It can provide useful insights of groups of stakeholders within and beyond supply chains.

## Who should use it?

- Businesses
- Associations
- Suppliers
- Authorities
- Any organisation supporting UNGP implementation

## When to use it

The UNGPs self-assessment is intended to be used as a first step when wanting to start implementing the UNGPs, as well as to establish a baseline to identify gaps, target resources and actions, and measure future progress.

### Recommendations

- Besides answering the questions, provide as much documentation as possible
- Share the self-assessment with suppliers

**ECLT can support you:** This self-assessment questionnaire can be used individually or to establish a baseline for several actors. ECLT can help mobilise stakeholders, customise and coordinate the assessment process and provide technical assistance to interpret results that lead to action plans in line with the UNGPs.

## Policies

Does your company have a statement of policy to eliminate child labour in its tobacco sourcing supply chains?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the policy commitment 'to eliminate child labour' approved at the most senior level of your company?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is your policy commitment 'to eliminate child labour' informed by relevant internal and/or external expertise?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does your policy commitment stipulate the company's child labour expectations of personnel, business partners and other parties directly linked to its operations, products or services?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the policy commitment publicly available and communicated both internally and externally?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the policy commitment reflected in operational policies and procedures necessary to embed it throughout the company?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the company's policy commitment to eliminate child labour consistent with the ECLT Pledge of Commitment?

☐ Yes

☐ No

(Additional information and supporting documentation)

## **Policies (continued)**

**Does the policy commitment stipulate that children of legal working age shall not perform hazardous work as defined by national regulatory frameworks?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

**Does the policy commitment state that the minimum age for admission to non-hazardous employment shall not be less than the age prescribed by national law and should respect the relevant minimum age established in the ILO Conventions and Recommendations on child labour?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

**In the context of family farms, where applicable, does the policy commitment promote a level of child protection that meets or exceeds the protections provided by international child labour frameworks?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

**Is the policy in an understandable form for the farmer base and/or workers who may be illiterate and/or affected by the policy (e.g. in multiple languages as applicable)?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

**Definition of hazardous work: Does the company have a specific list of hazardous tasks that children under 18 are prohibited from doing on tobacco farms?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

## Due Diligence

Does the company have a system or process to identify, prevent, mitigate and account for how it addresses its impacts on children in its tobacco sourcing supply chains?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the company's child labour due diligence process consistent with its size, the risk of severe child rights impacts, and the nature and context of its operations?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the company's child labour due diligence process consistent with the UNGPs?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the company's child labour due diligence process, including tracking, involve instances of meaningful consultation with relevant stakeholders, as appropriate to the size of the company and the nature and context of its operation?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does the company's child labour due diligence process cover both adverse impacts a) that the company may directly cause; and b) those which may indirectly arise through its business relationships?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does the company have processes and actions in place to prevent child labour from materializing, or at least reduce, as far as possible, the extent to which it may do so?

☐ Yes

☐ No

(Additional information and supporting documentation)

In order to prevent and mitigate adverse impacts on children in its tobacco sourcing supply chains, does the company integrate findings from its impact assessments across relevant internal functions, including assigning the responsibility to the appropriate level and function, decision making, budget allocation and oversight?

☐ Yes

☐ No

(Additional information and supporting documentation)

## Due Diligence (continued)

Does the company communicate publicly about how it addresses its impacts, including on children, in its tobacco sourcing supply chains?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does the company have a system of tracking the effectiveness of its child labour programmes, including appropriate qualitative and quantitative indicators?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does the company have varying degrees of leverage in all markets and/or with specific suppliers?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does the company's business model with respect to tobacco sourcing allow it to use its leverage in addressing child labour at the bottom of its supply chain?

☐ Yes

☐ No

(Additional information and supporting documentation)

How does the company work to increase its leverage in specific markets where direct contracts may not be possible due to legislation or the market structure?

☐ Yes

☐ No

(Additional information and supporting documentation)

Is the company's child labour due diligence an ongoing process i.e. does it recognize that risks to children may change over time as the company's operations and operating context also change?

☐ Yes

☐ No

(Additional information and supporting documentation)

Does the company's child labour due diligence process draw on internal and/or independent external child rights expertise?

☐ Yes

☐ No

(Additional information and supporting documentation)

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## **Due Diligence** (continued)

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**Is the company's communication about the due diligence process accessible to its intended audiences and provide information that is sufficient to evaluate the adequacy of the company's response to child labour?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

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**Does the company's public communication on child labour protect the confidentiality of affected stakeholders, including children?**

☐ **Yes**

☐ **No**

(Additional information and supporting documentation)

## Remediation

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Does the company provide for or cooperate in the remediation of impacts on children through legitimate processes, where it has caused or is associated with in its supply chain?

☐ Yes

☐ No

(Additional information and supporting documentation)

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How does the company remediate for its actual impacts with respect to child labour?

☐ Yes

☐ No

(Additional information and supporting documentation)

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What processes are in place to manage non-compliance with child labour provisions?

☐ Yes

☐ No

(Additional information and supporting documentation)

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Are there processes in place (e.g. training programs) to ensure that suppliers have knowledge and competences to implement the company's child labour policies?

☐ Yes

☐ No

(Additional information and supporting documentation)