

# Better Cotton Assessment Process

February 2023



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# Better Cotton Assessment Process

This document outlines the process for carrying out Licensing Assessments and Surveillance Assessments in the context of the Better Cotton Assurance Programme. It is applicable to approved third-party verifiers or qualified Better Cotton teams<sup>1</sup> carrying out Licensing Assessments or Surveillance Assessments, as outlined in the [Better Cotton Assurance Manual](#). The process presented in this document can also be a useful reference for Better Cotton Implementing Partners in carrying out PU Support Visits and Readiness Checks.

This document supersedes the previous version 'BCI ASSESSMENT GUIDANCE DOCUMENT V1.2 March 2020'

|                  |   |
|------------------|---|
| Issue date       | 27 February 2023  |
| Effective date   | 1 April 2023  |
| Previous version | <p>This document replaces the version published in March 2022. Changes include:</p> <ul style="list-style-type: none"> <li>• Changing this from a guidance document to a requirements document</li> <li>• Taking out the allowance for assessors to provide technical advice during an assessment and confirming what information the assessor can provide</li> <li>• Confirming how assessment of the compliance of a PU management system should be done</li> </ul> |
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<sup>1</sup> Or strategic partners in countries where Better Cotton operates through a strategic partner

# 1. Introduction

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## 1.1. Background

Under the Better Cotton assurance model, all Producers<sup>2</sup> require a Licensing Assessment before they can receive a three-year licence to sell Better Cotton. Licensing Assessments are field-based visits that assess compliance against Core Indicators in the Better Cotton Principles & Criteria and monitor progress against continuous improvement priorities.

Licensing Assessments are carried out:

- For Large Farms - by approved third-party verifiers
- For Producer Units (PUs) of smallholder farmers or Medium Farms - by either qualified Better Cotton Programme Officers/ Coordinators or approved third-party verifiers

Licensing assessments are carried out on all Producers before earning an initial licence to sell Better Cotton, and before renewing the licence.

Surveillance assessments are carried out on a small sample of PUs during the active licence period; however, the general format and approach is the same as a Licensing Assessment.

Therefore, in this document the term '**assessment**' applies to either a Licensing or Surveillance Assessment, and the term '**assessor**' applies to either an approved third-party verifier or a qualified Better Cotton team member who carries out assessments.

All third-party verifiers and Better Cotton assessors are required to follow the relevant parts of this process document

## 1.2. Reference documents

Assessors should read and be familiar with the following documents before conducting an assessment visit.

- [Better Cotton Assurance Manual](#) – this provides a detailed overview of the Better Cotton assurance programme, including the role of different types of assessments and support visits, grading of non-conformities, corrective actions, and licensing processes
- [Better Cotton Principles and Criteria v2.1](#) – this is the standard against which all Producers are assessed. It includes both Core Indicators and Improvement Indicators across 7 Principles. For Core Indicators, compliance is mandatory in order to be licensed to sell Better Cotton.

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<sup>2</sup> In the context of the Better Cotton Standard System, Producer refers to either a Producer Unit of small or medium farms, or an individual large farm

Improvement Indicators are not mandatory but are aimed at measuring continuous improvement over time.

The following documents are relevant during and after the assessment process

- [Better Cotton Assessment Field Checklist](#) (Smallholder, Medium Farms, Large Farm versions) – optional resource to guide the assessment process and record findings in the field
- [Better Cotton Assessment Report Template](#) (Smallholder, Medium Farm, and Large Farm versions) – mandatory for all assessments.

## 1.3. Objectives of the Assessment

The main objectives of the assessment are to:

- Verify whether the Producer is in conformity with the Core Indicators to inform the final licensing decision made by Better Cotton Assurance Managers;
- Check progress against the Continuous Improvement Plan (CIP);
- If non-conformities are identified, provide the Producer with a non-conformity report to enable the PU/LF Manager to develop a Corrective Action Plan (CAP).

# 2. Preparation for assessment visits

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## 2.1. Timing and sample selection

Assessments can be carried out throughout the crop season.

Assessors should inform the PU/LF Manager of the dates of the Licensing Assessment one week before the visit. Any changes to the scheduled dates should be communicated to the PU/LF Manager as soon as possible.

For Smallholder and Medium Farm PUs, a sample of farmers are visited during an assessment. The minimum number of farms/ farmers to be visited is set out below:

- In the case of smallholders: a minimum of 3 Learning Groups are checked and 5 farmers per Learning Group, equalling at least 15 farmers per PU.
- In the case of Medium Farms: a minimum of 3 medium farms are visited.

Additional farmers should be visited whenever possible – these are minimum sample sizes.

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Learning Group and farmer samples should be selected and communicated prior to each assessment.<sup>3</sup>

Assessors should select Learning Groups or farmers accounting for the variations within the Producer Unit. Factors that can be considered may include gender split of farmers; irrigation type; variations in landholding size; location spread; Field Facilitators with the largest number of farmers under their charge etc. Learning Groups must not be selected based on ease of access.

Assessors should notify the PU Managers about the LGs and farmers to be visited one day before the scheduled start date.

The duration of an assessment visit will depend on the geographical region and the size and complexity of the Producer. On average an assessment visit to a Producer Unit might take 3 days; Large Farms might take 1-1.5 days. Where significant travel time is required the assessment duration should be increased to ensure a thorough and effective assessment has taken place.

### 2.1.1. Early season assessments and sample selection

Where assessments take place prior to the end of sowing, the following steps should be followed to support with Learning Group and farmer sample selection:

- Learning Groups and farmers should be selected from the previous season's farmer list.
- Assessors should select the normal sample with reserves to offer when farmers or LGs have left the programme ensure the selection of samples is independent and does not sit with the PU Manager
  - for smallholder PUs, 5 LGs and 10 farmers should be selected in the sample which can be used as alternatives where Learning Groups or farmers leave the programme.
  - for Medium Farm PUs, 5 farmers should be selected in the sample which can be used as alternatives where farmers leave the programme
- The sample should still be communicated one day before the scheduled start date – this is the opportunity for the PU Manager to inform of changes in LGs and/or farmer composition.

## 2.2. Translators/ Interpreters

While preparing for the assessment, assessors should confirm information on the language that is locally spoken. If local language is not spoken by the assessor/team of assessors, appropriate, independent and impartial translation services must be arranged<sup>4</sup> (see paragraph 12 of [Better Cotton Assurance Manual](#)).

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<sup>3</sup> Learning Group and farmer samples are selected from the farmer list submitted by the PU at the end of sowing deadline (more information on the deadline and data requirement can be found in the [Better Cotton Assurance Manual](#)). Where assessments are scheduled prior to end of sowing, samples are to be determined from the previous season's farmer list.

<sup>4</sup> In some cases, Better Cotton may coordinate this process and organise relevant translators for the assessment.

Translators/ interpreters must maintain neutrality towards the interviewee. Assessors should ensure direct translation to maintain accuracy and completeness of the interviewee’s statement.

## 2.3. Assessment visit components

Each of the following components are described in the next section of this document<sup>5</sup>

| Step   | Description  |
|--------|--|
| STEP 1 | Gathering information from local sources (for third-party verification only) |
| STEP 2 | Opening meeting/ management interview  |
| STEP 3 | Farmers interview  |
| STEP 4 | Visual inspection  |
| STEP 5 | Workers interview  |
| STEP 6 | Documentation review   |
| STEP 7 | Closing meeting  |
| STEP 8 | Analysis and reporting   |

# 3. Components of the assessment

The different components of the assessment are presented in steps for the purpose of clarity. However, there are often overlaps between steps; for example, the opening meeting with PU management is also the opportunity to review the documentation available at PU level. Similarly, documentation review may happen during the farmers interview or visual inspection.

Before starting step 1 of an assessment, assessors should review previous assessments for the same Producers and, in the case of PUs, be informed of changes in composition of the PU (i.e. percentage of new farmers) and changes in PU staff.

<sup>5</sup> Where the assessment is conducted via remote format, the assessors should refer to Better Cotton’s additional guidance relating to conducting remote assessments. Each assessment visit component continues to be a requirement but will be conducted via the support of technology and communication platforms.



Building the capacity of farmers is at the core of Better Cotton’s mission, and as a result, assessments provide an opportunity for learning and continuous improvement.

In providing information to farmers and Producers, assessors may:

- Provide explanations of the Better Cotton Principles and Criteria and clarify any misunderstandings around indicators
- Provide explanations of Better Cotton programme and related licensing process
- Share documentation relating to the Better Cotton programme (e.g. updates to HHP lists)
- Focus on highlighting good practices relevant to the Producer’s areas of improvement

In providing information to Producers, assessors may not:

- Mandate specific approaches to the implementation of the Better Cotton Principles and Criteria, or specific non-conformity remediation
- Offer any kind of paid consultancy services or training
- Provide a formal indication of the licensing decision during the assessment visit
- Suggest or recommend approaches to implementation of the Better Cotton Principles and Criteria, or possible approaches to address non-conformities.
- Review and comment on PU documentation and procedures

*Please refer to the Better Cotton Assessment Field Checklist for an indication on the type of questions that could be asked and documents that may be reviewed during the assessment.*

## 3.1. Gathering information from local sources

|                                      |  |
|--------------------------------------|--|
| <p><b>KEY POINTS TO REMEMBER</b></p> | <ul style="list-style-type: none"> <li>• This step is required only for third-party verifiers, but is also encouraged for assessments carried out by Better Cotton teams<sup>6</sup></li> <li>• The objective is to conduct verification in a locally appropriate manner addressing issues of local importance</li> <li>• Verifiers shall contact at a minimum 3 local sources</li> <li>• Findings are reported in the Better Cotton Assessment Report template</li> </ul> |
|--------------------------------------|--|

<sup>6</sup> Where agreed with Better Cotton, information from local sources may be gathered at the district level which can be used by both 3PVs and Better Cotton assessors.

The purpose of this step includes gathering local information about general and, if available, site-specific agronomic and working conditions from reliable sources (e.g. use of banned chemicals in cotton cultivation, source of water for irrigating the cotton crop, conversion of protected forest for cotton cultivation, peak labour requirements and migrant labour, prevailing health and safety problems among farmers and workers, etc.). It is also an opportunity to gather information about the most effective and appropriate means of communicating with workers and farmers locally. While the process for gathering local information can vary, there are a few high-level steps that are usually relevant. These include:

### 3.1.1. Identification of organisations

- Identify local organisations that are capable of providing useful information that is as objective as possible. Make all efforts to ensure that a range of perspectives are included.
- Sources through which local organisations can be identified include the Better Cotton country teams, Better Cotton Secretariat, NGOs with whom the assessor might have contact elsewhere, public officials, and other civil society organisations. In case no contacts are available, an Internet search can also be performed.
- An initial list of organisations should be reviewed to determine whether it is comprehensive in terms of both numbers and range of perspectives. Assessors should seek to gather sufficient information to make informed judgments in conducting the verification, taking into account the level and nature of local organisations present.
- Care should be taken not to conduct these consultations in a manner that will compromise the local organisation's ability to operate safely in its local community. All elements of the contact should be conducted with this in mind, from the moment of initial contact. For example, it may be useful to conduct the meeting in a location chosen by the organisation, which may have the need to ensure that it is not being compromised by contact with organisations from outside its community.

### 3.1.2. Identification of general issues

- Initial questions should be general and open-ended, allowing the persons being interviewed to point out specific issues, both positive and negative. The overall approach should focus on asking the organisation to provide guidance on the issues that are of greatest importance in the area on which it is knowledgeable. This can focus both on Better Cotton Principles and Criteria issues on which levels of conformity are low, as well as those issues that the organisation does not view as a particular problem.
- Based on the direction of the conversation, questions could become more direct as the conversation progresses. The objective of the exercise should be to gain information, not to encourage criticism.

### 3.1.3. Identification of farm/learning group specific issues

- Ask the organisation if it is aware of any farms/growers in the region that are believed to have particularly poor or good practices. If so, ask them to explain, to the degree possible and without placing individuals at risk, the information on which their opinion is based.
- Where appropriate, ask the organisation about local labour and hiring practices, including for example the types of workers used, where they come from, and the types of contracts used.
- Any information gathered about specific farms/growers should be used to heighten or lower the level of attention paid by the assessor. It should not be used to provide an outside-the-farm answer to the question of what is going on in the farms.

### 3.1.4. Identification of locally appropriate information gathering techniques

- Ask the organisation to make recommendations about the ways that workers can be approached, or other information gathered, in ways that are particularly appropriate to the location where the verification is taking place. This part of the process is designed to ensure that information is gathered thoroughly and in a way that does not place workers at risk.
- Such information may take a variety of forms. The most obvious issue is to identify culturally sensitive ways to interview workers. This might include information about how to ask questions, who is best suited to interview the local workforce, and non-verbal clues that will be useful in interpreting the interview process. It may also consider, for example, whether workers immediately leave farms for home after work, to determine when it might be most fruitful to speak with them. Finally, local groups are often well networked and may be able to suggest other knowledgeable groups the assessor could meet with
- Are there particular cultural issues, or methods of communication, that should be considered in assessing local farms' adherence to harassment or abuse provisions? Where does the workforce come from (e.g., rural, urban, internal migration, etc.), and how should that be factored into effective ways to deter harassment or abuse?

### 3.1.5. Compile and analyse information

- Once a range of interviews is completed, the assessor should compile all the information gathered in the assessment report.
- Factors that may be useful in synthesizing the information gathered include: the frequency with which certain issues are raised; the reliability of the information on which the opinions are formed; how recent the information is, etc.
- It is important that the nature of the NGO's relationships should be identified as clearly as possible. If, for example, a local group is an advocate of worker rights and is engaged in supporting a strike or some sort of protest activity directed at the farms in question, or conversely, if the NGO is the recipient of grants or project support from the implementing partner or the Better Cotton, the nature of the relationship has to be taken into account. While

not possible in all cases, gathering information from a range of sources will facilitate the assessor's ability to draw accurate conclusions.

### 3.1.6. Issue-specific guidance

The meeting with local sources of information should provide an opportunity to address the following:

- Significant levels of potential non-conformities against Core Indicators or local law.
  - Identification of the basis for such conclusions
  - Locations (farms, regions, villages etc.) where this issue is particularly significant
  - Changes in practices or performance over time
- Awareness of problems on the part of the local government and, if present, any actions to address it
- Identification of particularly good practices related to Core Indicators or legal compliance; including the basis for such conclusions
- Recommended verification techniques that will be particularly effective in the local context
- Elements of the local laws and enforcement practices that might contribute to high levels of non-conformities with Core Indicators and/or local law

### 3.1.7. Possible Sources for External Information

The assessor should interview/meet at least 3 organisations/individuals for external information gathering during each verification visit. Sources of information can include:

- Local or village schools
- Local (village, district) authorities (for instance village head, mayor, council members)
- Local Agriculture Officer
- Local Medical Officer
- Local Development Officer
- Local civil society organisations
- Local agricultural labour inspector
- Other growers and labourers in the village
- Reports and news clippings (additional to interview/meetings requirements)
- Local or regional representatives of agricultural worker organisations, if they exist
- If appropriate, regional authorities and regional civil organisations

## 3.2. Opening meeting/ management interview

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| <p><b>KEY POINTS TO REMEMBER</b></p> | <ul style="list-style-type: none"> <li>• Introduce all participants to the purpose and requirements of the visit</li> <li>• For Producer Units, review the effectiveness of the Internal Management System</li> <li>• Review Producer status against the Core Indicators</li> <li>• PU Manager or Farm Manager must be present</li> </ul> |
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The assessment visit starts with an opening meeting with the PU or Large Farm management team. Given their critical role in the Better Cotton programme, the Farm Manager or PU Manager must be present during the entire meeting. The aim of the opening meeting is to:

- Carry out welcome and introductions<sup>7</sup> (observe business courtesy)
- Clearly explain the purpose and structure of the assessment
- Establish the schedule and requirements of the visit, including any access needed to relevant documents, production locations, interview with relevant staff, etc.
- Review policies and procedures related to the implementation of the Better Cotton P&C
- Obtain assurances from management that no retaliatory steps will be taken against farmers and workers who speak to assessors
- Determine the most appropriate order for conducting the visit, and the location of the records.

### Interview with PU/ Farm Management

The management interview is a key element in assessing compliance against Core Indicators and understanding how the Producer is progressing against its Continuous Improvement Plan. For PUs, it is also a good chance to understand how the Internal Management System is structured and how well it is working in practice.

The management interview can cover the following points:

- Organisation of project team (coordinator, senior staff/advisors, PU/ farm manager, field facilitators, etc.)
- Field operational set up: Number of PU, villages, categorisation of farmers, Learning Groups, number of farmers, etc.

<sup>7</sup> Include introduction of the interpreters / translators where included in the assessment activity.

- Participation in training delivered by the Implementing Partner, Better Cotton trainers, or external expert organisations
- Training subsequently delivered to facilitators, farmers and workers
- Training and awareness -raising methodology(s) used: Farmer Field School, Demo plots, LG meetings, individual visits to farms, etc.
- Training schedule including details on: the date(s) of training, training content, frequency, the trainer and trainees, training materials developed/used, inputs given etc.
- Level of knowledge of PU Manager and Field Facilitators around the Better Cotton Principles and Criteria, along with locally relevant sustainability practices
- Awareness of roles and responsibilities of the team members (in particular of the PU Manager and the Field Facilitators)
- Continuous Improvement Plan; including how the plan was developed, when it was last reviewed, and the Producer’s performance against the plan
- Data management system in place
- Reporting on Results Indicator (RI) data – including any challenges with the data
- Enforcement of corrective actions resulting from previous assessments or monitoring activities
- Awareness of the self-assessment process and how to use this information
- Internal assessment process conducted by the PU Manager (on 10% of LG or 10% of Medium Farms, for PUs only)
- General labour and agricultural practices adopted by Better Cotton farmers
- Any other activities that have been carried out so far in the field

For additional questions that can be asked, please refer to the *Better Cotton Assessment Field Checklist*.

### 3.3. Farmer Interviews

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|-------------------------------|---|
| <p>KEY POINTS TO REMEMBER</p> | <ul style="list-style-type: none"> <li>• For PUs, the aim is to review status of farmers against the Better Cotton Core Indicators - this includes participation at trainings, level of awareness on key sustainability issues, and adoption of more sustainable practices</li> <li>• Key mechanism to assess whether trainings have been effective at raising farmer awareness, and to cross-check internal PU records (such as training logs, adoption records, etc)</li> </ul> |
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|  | <ul style="list-style-type: none"> <li>Typically carried out through one-on-one interviews and/or focus group discussions</li> </ul> |
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For Producer Units, a separate meeting with farmers of the selected Learning Groups (or medium farmer) should follow the opening meeting. The purpose of meeting with the farmers is to assess their understanding of current farming practices with respect to the Core Indicators and priority areas as set out in the Continuous Improvement Plan. Farmers should be interviewed one-to-one and through Focus Group Discussion (refer to the Annex on conducting interview and focus group discussions for more detailed guidance).

**Key issues to be addressed during farmer discussions / interviews:**

- Knowledge and understanding of the Better Cotton Principles and Criteria – especially priority areas as identified in the CIP
- Participation in PU activities and training events – are farmers engaged and participating?
- Motivation to adopt and promote social and environmental practices and labour welfare measures
- Effectiveness of the training and capacity building programme delivered by Implementing Partners – can farmers recall key concepts? Was the training useful? Have they changed anything in their way of thinking or farming?
- Method and frequency of the training
- Level of adoption of more sustainable practices
- Cross-checking PU records with field-level data and farmer knowledge (use of pesticides, number of sprays, number and type of workers, etc)

**Sample questions for farmer interviews**

- How do you decide when to use pesticides?
- How do you observe/monitor your cotton crop for pests and beneficial insects?
- How do you minimise contamination?
- Do you use workers or family helpers on your farm?
  - If so, how many? How are they hired? Where do they live? How do you pay them?
  - Are your workers free to come and go on their own will? What are the terms of their work agreement?
- Are you part of a producer organisation?
- Are your children helping you on your farm? What do they do?
- When do you children go to school?

- Can you read and write? What documentation is maintained at farm level?
- Did you receive a farmer field book?
- What data do you have to provide to Field Facilitators?
- How do you manage your soil health currently? Are there any new practices you have learned about or are interested in trying?
- What type of training did you receive this season from your Field Facilitator? What can you recall? Was any of this training useful?
- Did you receive any documentation in local language on best practices?
- Who carries out pesticide spraying? What kind of protective equipment do they use?
- How do you dispose of your empty pesticide containers?
- Are there any disadvantaged groups locally in your family or village?
- In your producer organisation, are women holding a position of responsibility?

Please refer to the *Better Cotton Assessment Field Checklist* for further questions that can be asked during farmer interviews.

### 3.4. Visual Inspection

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|--------------------------------------|--|
| <p><b>KEY POINTS TO REMEMBER</b></p> | <ul style="list-style-type: none"> <li>• For smallholders: a minimum of 15 farms (in 3 Learning Groups) need to be visited in each PU selected for external assessment</li> <li>• For medium farms PUs, a minimum of 3 medium farms need to be visited for each PU</li> <li>• Assess work or agricultural management practices adopted on the farm in relation to the Better Cotton P&amp;C</li> <li>• Observe if there are cases of non-compliance at farm level</li> <li>• Take pictures or collect other evidence as needed to support findings in the Better Cotton Assessment Report; especially for cases of non-conformity</li> </ul> |
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The exact length of the farm visit/ visual inspection should be determined by the size of the farm and the time available. Larger farms or more complex Producers may require a longer visit, to ensure that as much of the farm is viewed as possible during the visit.

Issues that can be assessed during visual inspections:

- Farmer names corresponding to farmer list
- Work practices that may affect health and safety



- Type of labour used in the farm (children/young persons, pregnant women) and work performed by each of them.
- Specific management practices being adopted by farmers (e.g. crop protection, water, soil, fibre quality, habitat, decent work)
- Water sources used for irrigation
- Availability of potable water facilities (wells, bore wells, taps, etc.).
- Migrant workers and their living premises.
- Living space provided by the farmer to workers (if applicable)
- Types of pesticides and fertilisers used.
- Storage of pesticides and fertilisers.

### 3.5. Workers Interview

|                                      |   |
|--------------------------------------|---|
| <p><b>KEY POINTS TO REMEMBER</b></p> | <ul style="list-style-type: none"> <li>• Key component of the assessment is to understand the status of the Producer in relation to Decent Work</li> <li>• Includes one-on-one interviews and/or focus group discussions</li> <li>• Interviews should be carried out with different categories of workers</li> <li>• PU Managers/ Farm Managers, Field Facilitator, IP Representatives (or anyone else who may compromise the workers’ ability to answer freely) must not be present during interviews</li> <li>• Workers should be reassured that findings will be anonymised, and their name will not be shared back in any final report to the PU or farm manager</li> </ul> |
|--------------------------------------|---|

A representative sample of workers (when applicable) from all production areas should be selected for interviewing. It is important to interview as many female workers and workers who look young or particularly vulnerable as possible. In some countries it is culturally very difficult, and sometimes may be impossible, to interview female workers. In such cases, support from the Producer should be required (e.g. conducting the interview with a female facilitator).

Under no circumstances should farmers, PU staff, or IP representatives play any role in the selection of workers to be interviewed. The assessor should interview an appropriate sample of workers to provide confidence that an accurate picture of workplace practices is obtained. At least 25% of all workers on each farm (in case of medium farms and large farms) and at least 6 – 12 per village (in case of LG) should be interviewed, where this number of workers is present. These interviews can be

a combination of individual interviews and focus group discussions (see Annex on conducting interview and focus group discussions for more detailed guidance).

Workers' interviews should be made with different categories of workers based on employment terms (permanent, casual, and daily workers), tasks being conducted (for e.g. weeding, pesticide application, picking, hazardous work), gender groups, age groups, ethnic groups, racial, national origin, disadvantaged in the workplace, and workers engaged in particularly hazardous processes.

**Sample of issues that can be addressed during worker interviews:**

- Nature of the employment relationship (i.e. family or hired labour; contract terms)
- Verification of age
- Method of hiring, e.g., individual contract, through contractors
- Freedom of employment – are workers able to leave at any time? Where do they live?
- Other binding contracts between the farmer and the worker (loans, mortgage, etc.) and their effect on forced labour
- Migrant status of the worker
- Payment system adopted by farmer (advance payment, cash, in-kind). External assessors should also verify whether there are any workers who are working without wages being paid to him/her directly (bonded labour)
- Same wage for same work and performance irrespective of age or gender
- Training provided to workers such as health and safety, first aid, chemical usage and disposal, Better Cotton Production Principles and Criteria
- Presence of rest area with shade
- Awareness on compensation and benefits and minimum wages
- Work allotment practices (as this may lead to discrimination)
- Breaks provided during work
- Drinking water and sanitation facilities
- Disciplinary methods used by the farmer

Please refer to the Better Cotton Assessment Field Checklist for further questions that can be asked during worker interviews.

## 3.6. Documentation review

|                                      |   |
|--------------------------------------|---|
| <p><b>KEY POINTS TO REMEMBER</b></p> | <ul style="list-style-type: none"> <li>• For Producer Units, this is a key component to assess the Internal Management System put in place by the Producer Unit</li> <li>• Required plans and policies should be well understood, relevant and used by the PU or Large Farm – it is not sufficient that the document just exists somewhere in an office or folder</li> <li>• Documentation need to be checked at different levels (where applicable): farmer, Learning Groups, field facilitators, Producer Unit</li> </ul> |
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The aim of the documentation review is to gather information about the overall project management, training materials, plans and policies promoted, and data management system. This will allow the assessor to assess the overall quality of the Producer’s internal management system.

During the document review it is critical to check that documents not only exist – i.e. the plan has been developed – but that these documents are well understood, relevant and used by the PU Manager/ Farm Manager and Field Facilitators. The assessor should confirm that documents are not just kept in a folder to be checked during an assessment, but they are actively used and maintained by the PU or Large Farm as a part of their overall management system.

**Sample of documents that may be reviewed**

- Integrated Pest Management plan
- Pesticide application records
- List of pesticides nationally registered for cotton
- List of pesticides used by the farm/ PU
- Records showing use of Personal Protective Equipment or safety equipment
- Soil management plan
- Biodiversity management plan
- Water stewardship plan
- Continuous Improvement Plan
- Training materials for farmers and workers
- Training records
- Evidence of best practices shared
- Internal policies and procedures (farm or PU level)
- Child labour plan (for smallholder PUs)
- Child labour policy
- Procedure for checking the age of workers; age documentation

- Non-discrimination plan/ written code of conduct
- Disadvantaged group plan (for smallholder PUs)
- Labour profile
- Farmer Field book template and distribution records
- Internal assessment report (for PUs)
- Corrective action plans from previous assessments
- Results Indicators report from previous season

Please refer to the Better Cotton Assessment Field Checklist for further detail on records that can be reviewed to verify compliance with each indicator.

## 3.7. Assessing compliance of the PU Management system

For all clauses in the Better Cotton Principles and Criteria the assessor will consider the overall management system:

- Policies/ Plans (realistic and locally relevant? Well understood)
- Competence (PUM and FFs)
- Implementation & Interventions (*what are they doing?*)
- Monitoring (*how do they track progress? Are issues detected?*)

The assessor will also consider overall how the PUs internal management system assures compliance to the P&Cs across the PU considering:

- Learning group formation and participation
- Data collection from farms and use in monitoring compliance
- Internal assessment sample planning and reporting
- Corrective actions implementation across farms in the PU – through training or other interventions

## 3.8 Closing meeting with PU/ Farm Management

At the very end of the visit, the assessor should carry out a closing meeting. In this meeting, assessors have a final opportunity to ask clarifying questions or request additional evidence – for example if the assessment has uncovered conflicting information. The closing meeting is also the opportunity to:

- Thank the PU/ Farm Manager and other attendees for their cooperation during the visit
- Re-iterate the purposes of the assessment and what was covered
- Provide clear feedback to the Producer about areas where they are performing well (positive feedback)
- Clearly explain any gaps or potential non-conformities observed, along with a summary of the objective evidence collected
- Identify improvement opportunities noted during the visit
- Explain the timeline to receive the Better Cotton Assessment report and the timeline to close any non-conformities.

A **short written summary** of key findings is shared with Producer at this point and is used to guide the closing meeting discussion. Note this is not a final assessment report and will not include non-conformity gradings or final licensing decisions. Rather it is an initial set of findings that ensure key points are covered during the closing meeting and provides the Producer with a chance to ask questions and provide clarifications before the end of the assessment. It should cover both positive elements of the PU/ Large Farm performance and areas where more improvement is required. Refer to section 8.3.1 of the [Better Cotton Assurance Manual](#) for more detail. The assessor will be asked to share a copy of the summary of key findings with Better Cotton via email (this can be a photo of the short written summary if completed by hand).

### 3.9. Analysis and reporting

|                               |  |
|-------------------------------|--|
| <b>KEY POINTS TO REMEMBER</b> | <ul style="list-style-type: none"> <li>• Cross-check the information collected in the different steps</li> <li>• Compile information from notes, photos, documents collected, and the field checklist (if used) to prepare a final Better Cotton Assessment Report</li> <li>• Ensure Producers receive the non-conformity report after the visit and Corrective Action Plan template where applicable</li> </ul> |
|-------------------------------|--|

The assessor should compare and contrast information received from different sources, including external sources, worker interviews, farmer interviews, documentation reviews, management systems review and visual (farm) inspection. Testimony, policies and documents must be cross-checked against visual inspection and actual practice. Conflicting findings must be sorted out through reiteration and further analysis. The assessor should thoroughly and objectively review a large body of information and make sound, objective, unbiased judgments concerning the status of the Producer against the Core Indicators.

The results of the assessment visit are presented in the *Better Cotton Assessment Report Template* in Word for revision and then in PDF once finalised and reviewed.

The report template comprises of the following components:

- a summary information section with information on assessor and farmers visited;
- a summary outcome of the visit, including overall information on non-conformities ;
- a section with information collected from external sources required for 3PVs
- the list of indicators for which to select grading and add comments/evidence.

The assessment report is to be completed after the visit has been finished; one report is completed per Producer Unit or Large Farm. 3PVs must share the report with Better Cotton within eight (8) days following the completion of an assessment.

**After the visit is complete, Better Cotton staff is expected to share the completed Licensing Assessment report and Corrective Action Plan (CAP) template, where required, with the PU/LF Manager within 3 weeks.**

The *Better Cotton Assessment Field Checklist* is an optional resource that can be used to collect the necessary information whilst conducting the visit in the field. The field checklist should be printed and filled during the visit. It will form the basis to prepare the assessment report. The field checklist does not need to be sent to Better Cotton. During the visit, pictures should also be taken to support the report (e.g. documents, good practices, working conditions, etc.) – this is especially important for providing evidence in case of non-conformity.

## 4. Non-conformities

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As a result of assessments, assessors can raise non-conformities at PU/LF level if weakness in the management systems are found or/and if farmers (or a sample of farmers in the PU) are not adhering to the P&C with their practices.

Non-conformities (NCs) identified during Licensing Assessments and Surveillance Assessments are graded as either incidental or systemic, based on how severe and spread the issues are.

Conditions to determine the level of non-conformity, including consideration around strengths of Internal management System in the case of PUs, are [Better Cotton Assurance Manual](#) paragraph 19 and all assessors must follow those conditions.

Assessment findings impact licensing decisions in three possible ways:

- a. If assessors find one or more systemic non-conformities on a PU/LF, the overall outcome of assessment will be systemic non-conformity. Hence, assessors, recommend the PU/LF for license denial or cancellation.
- b. If assessors find one or more incidental non-conformities on a PU/LF but no systemic, the overall assessment outcome will be compliant with incidental. Hence, assessors recommend the PU/LF for license approval or retention, under the condition that PU/LF puts corrective actions in place and corrects the non-conformities within 6 months.



- c. If assessors find full conformity in all indicators, the overall outcome of assessment for the PU/LF will be compliance. Hence, assessors recommend the PU/LF for license approval or retention.

Assessors can also escalate an incidental non-conformity to systemic if specific circumstances are fulfilled, leading to scenario a. above. Those circumstances are detailed [Better Cotton Assurance Manual](#) paragraph 19 and all assessors must keep those into consideration when completing the assessment.

Steps related to closure of non-conformities are detailed in the [Better Cotton Assurance Manual](#) paragraph 19. In all instances, licensing decisions are ultimately made by Better Cotton Assurance Managers based on assessment findings from assessors. Licensing decisions are made at PUI/LF level, and, in the case of Producer Units, those are applicable to all farmers within a PU.

# Annex: General guidance on conducting interviews and focus group discussions

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## 1. Conducting Interviews

### *Skills*

Interviewers must have sufficient language skills to conduct effective interviews, and be sufficiently knowledgeable about local cultural characteristics and farm conditions to analyse information gathered through the interview. If local language is not spoken, the audit team must arrange appropriate and impartial translation services (see paragraph 2.2. Translators/ Interpreters).

### *Preparation*

Interviewers should determine, in advance of the visit, which issues should receive particular attention in the location where the visit will take place. For example, if in the interviewer's experience the issue of child labour has arisen in a particular region, these issues should receive closer attention. This will vary from location to location. Sources of information for this focus will include knowledgeable local organisations, interviewer's experience, and information received from media reports and other public sources, etc.

### *Location*

Interviews should be conducted in a location that makes the interviewee comfortable. This is especially important for workers; the location should be chosen so as to not raise the possibility that the farmer will subject the worker to retaliation. Interviews with workers should be conducted at an independent place (it is better off the farm's premises), trusted by workers, where workers feel they have the freedom of speech. Common sense should be used to determine specific sites that afford the greatest opportunity for productive, confidential discussions. On-site locations include informal conversations in the green house, net house, plot of the farm; the area just outside the farm, common villagers' gathering place. In all circumstances, care should be taken to ensure that the location of interviews, whether on or off site, does not skew the information provided.

### *Safeguard Worker Confidentiality and Security*

All reasonable steps should be taken to ensure that the interview process does not compromise the safety or job security of the worker. At a minimum, interviewers must ensure that the interview

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process is conducted in a confidential manner. They need to conduct interviews in a manner that ensures that workers will suffer no adverse consequences as a result of the interviews by communicating the confidential nature of the interview; communicating that retaliation as a result of the interview is not permitted; and using interviewers who are most likely to gain the trust of workers (for e.g. female workers will most likely feel more comfortable with a female interviewer).

- Interviewers should inform workers that the interviews are confidential, and that the information will neither be attributed to them, nor provided to farmers or the management without their permission.
- In addition, interviewers should provide no information that could lead to the identification of specific workers as the source of information that could cause retaliation against the workers interviewed.

## 2. Interview Techniques

People in different parts of the world may respond to different approaches to the interview. Based on past experience and input from knowledgeable organisations, the interviewers should ensure that questions are asked in a culturally appropriate manner.

Several techniques, such as asking open-ended questions, are generally considered to contribute to effective interviews. These should be applied to the maximum degree possible. The interviewer should not provide any clues to the interviewees as to how they “should” respond. Interviewer should allow interviewees to respond to neutral questions that do not lead to one answer or another.

- Interviewees, especially farm workers, may be illiterate and have limited knowledge about their welfare or rights and may not understand abstract terms such as freedom of association, collective bargaining, etc. Therefore, interviewers should take care to use language that is easily understandable to interviewees, rather than words that may confuse. For example, asking workers if they are “harassed” may confuse, while asking if workers are treated fairly may elicit more and better information.
- Ask interviewees to describe situations that they have encountered, as well as issues related to the Better Cotton Principles & Criteria that they may have observed elsewhere. In some circumstances, workers (and farmers) may be more willing to describe difficulties affecting others than they will be to address issues they themselves face.
- Interviewers shall ensure that they conduct interviews in a manner sensitive to the cultural characteristics present. Sensitive issues, such as sexual harassment, bonded labour, caste system, forced labour, etc., need to be addressed in a careful and thoughtful manner. A determination of what these techniques are will necessarily vary from location to location. In making this determination, interviewer should rely on their own experience, information gathered through consultation with knowledgeable organisations, and other sources to determine, in advance of the visit, the best ways to conduct interviews.

### 3. Conducting Focus Group Discussions

A Focus Group Discussion (FGD) is a group discussion of (preferably) 6 - 12 people, guided by a facilitator, during which group members talk freely and spontaneously about a specific topic. Its purpose is to obtain in-depth information from the members of the group. An FGD aims to be more than a question-answer interaction, the idea being that group members discuss the topic among themselves in more depth (with guidance from the facilitator) than they would in a one-on-one interview. Discussing issues in a group format is also more efficient than a series of one-on-one interviews.

#### *Preparing for an FGD*

- Ensure that the issues / list of topics to be focussed on during the discussions are clear in your mind beforehand
- Ideally, there will be two people running the FGD, a facilitator to run the FGD, and a recorder to take notes. This might not always be possible.
- Ensure confidentiality of opinions, and request participants to do likewise
- Ensure that the area for the FGD is in a space that is quiet / free from distractions, is accessible, private and in a neutral location where participants will feel welcomed and comfortable
- Arrange participants in a circle. Recommendation is for the facilitator (and recorder) to sit at the same level as the participants to encourage discussion by minimising formalities and unintended power dynamics
- Consider having refreshments available for participants (away from the circle to avoid distractions during discussions)

#### *Conducting an FGD*

- The facilitator should introduce themselves, and the purpose of the FGD
- The facilitator should encourage discussion, and encourage as many participants as possible to express their views
- There are no right or wrong answers, and the facilitator should always react neutrally to any responses (verbal and non-verbal). It is important to remember that a FGD is not designed to reach a consensus position on an issue
- Avoid running a 'Question-and-answer' session; rather encourage discussion by asking participants to explain more about a topic, and by using one participant's response to ask another participant to follow up on a topic. Useful introductory phrases to use are, for example 'Farmer A said this, but what do you think Farmer B?', 'Tell me more about that ...', 'Can you explain what you mean ...'

- Only ask one question at a time
- Be comfortable with silence; some participants may be more likely to speak if they have time to consider the question, and their reply, before they speak
- If participants are not providing enough information, try probing questions, such as 'Please provide an example ...', 'Is there anything else ...' I don't understand, please explain...', 'Does anyone have a different opinion / see things differently...'
- If discussions go off in the wrong direction, you can use phrase like 'How does this relate to ...' 'Interesting point, but what about ...'
- Consider using anonymous written responses if sensitive issues stall the discussions
- Be on the look-out for non-verbal clues, such as body position, tone or strength of voice, facial expressions and body movement
- Avoid being the expert, and providing an opinion; rather direct the question back to the group: 'What do you think / what would you do' [However, consider setting aside time afterwards to in case there is a need to address issues / provide information that has been requested]
- Ensure participants clearly understand that their opinions are valued, and that they are the experts – the FGD is to help the facilitator(s) learn from them

### ***Role of the Recorder***

When available (e.g. team of 2 assessors working together), a designated recorder should keep a record of the content of the discussion as well as emotional reactions and important aspects of group interaction. Assessment of the emotional tone of the meeting and the group process will enable you to judge the validity of the information collected during the FGD.

Items to be recorded include:

- Date, time, place
- Names and characteristics of participants
- General description of the group dynamics (level of participation, presence of a dominant participant, level of interest)
- Opinions of participants, recorded as much as possible in their own words, especially for key statements
- Emotional aspects (e.g., reluctance, strong feelings attached to certain opinions)
- Spontaneous relevant discussions during breaks or after the meeting has been closed

A supplementary role for the recorder could be to assist the facilitator (if necessary) by drawing his or her attention to:



- Missed comments from participants
- Missed topics (the recorder should have a copy of the discussion guide during the FGD)

If necessary, the recorder could also help resolve conflict situations within the group that the facilitator finds difficult to handle on their own.