

APPROVAL PROCEDURES FOR VERIFIERS

APPLICABLE FROM 2018 HARVEST SEASON

This document presents the different procedures developed by the BCI for approving 3rd party verifiers: what are the core competencies required, the application/approval procedures in place or the complaint handling process for professional misconduct or negligence.

Table of Contents

Table of Contents.....	1
1 Introduction	2
2 Qualifications and competencies of potential verifiers	3
3. Application procedures	6
3.1 Verifier application form	6
3.2 Interview	6
3.3 BCI verifier training program	6
4. Approval	7
5. Review and re-approval	7
5.1 Review.....	7
5.2 Re-approval.....	8
6. Complaints against verifiers.....	8
Annex 1 Verifiers' Application Form.....	9

1 Introduction

The Better Cotton Initiative (BCI) exists to make global cotton production better for the people who produce it, better for the environment it grows in and better for the sector's future. BCI works with a diverse range of stakeholders to promote measurable and continuing improvements for the environment, farming communities and the economies of cotton-producing areas. BCI aims to transform cotton production worldwide by developing better cotton as a sustainable mainstream commodity.

To help achieve its mission, the BCI has developed the Better Cotton Standard System, the components of which are:

- » **Production Principles and Criteria:** providing a global definition of Better Cotton through 7 key principles.
- » **Capacity Building:** supporting and training farmers in growing Better Cotton, through working with experienced partners at field level.
- » **Assurance Program:** regular farm assessment and measurement of results through 8 consistent results indicators, encouraging farmers to continuously improve.
- » **Chain of Custody:** connecting supply and demand in the Better Cotton supply chain.
- » **Claims framework:** spreading the word about Better Cotton by communicating powerful data, information and stories from the field.
- » **Results and Impact:** monitoring and evaluation mechanisms to measure progress/change, to ensure that Better Cotton delivers the intended impact.

The Better Cotton Assurance Program involves farmers participating in a continuous cycle of learning and improvement; it is the central mechanism for assessing whether farmers can grow and sell Better Cotton. The purpose of the Assurance Program is to:

- » Assess whether Producers have reached a set of Minimum Requirements and can therefore receive a licence to sell Better Cotton;
- » Enable learning and continuous improvement by monitoring progress against Core and Improvement Indicators, and identifying improvement opportunities;
- » Provide an incentive for Producers to continuously improve their level of performance against Better Cotton Principles and Criteria;
- » Measure sustainability performance and improvements through the collection of the Better Cotton Results Indicators.

One of the fundamental tools of the Assurance Program is self-assessment. The self-assessment process is different for each category of farm as they have different Core and Improvement Indicators. Self-assessment, combined with external assessment allows for a credible and cost effective Assurance Program.

External Assessment is carried out by a number of actors:

- » 2nd Party Credibility Checks by BCI Country Co-ordinators and Officers (or Strategic Partners operating on behalf of BCI in partnership countries)
- » 2nd Party Credibility Checks by Implementing Partners
- » 3rd Party Verification by independent verifiers

The general objectives of the external assessments are to:

- » Check in situ the status of farmers/Producer Unit against the Core and Improvement Indicators
- » Support the farmers/Producer Unit in identifying both areas that are going well and areas for improvement
- » Review the effectiveness of the Internal Management System and identify systemic/incidental non-conformity (in the context of Producer Unit licensing)
- » Validate the performance band reported in the Self-Assessment survey
- » Enable corrective action to take place
- » Provide the BCI Assurance Managers with a sufficient level of confidence to decide whether to issue a licence to sell Better Cotton (in the context of Producer Unit licensing)

The BCI 3rd party verification approach requires verifiers to demonstrate independence, impartiality, and a high degree of rigor and thoroughness in assessing compliance with the Better Cotton Production Principles and Criteria.

This document describes the qualifications and competencies the BCI is looking for in 3rd party verifiers and provides guidance to the verification organisations on the application/approval process, performance review, and the process for handling complaints against verifiers.

2 Qualifications and competencies of potential verifiers

The BCI is seeking qualified verification organisations and verifiers to apply for approval with the BCI. Prospective verification organisations and verifiers may apply for approval for one or more countries.

Any organisation, company, or individual seeking approval as an independent verifier should initially read and be familiar with the following BCI documents available at <http://www.bettercotton.org>

- » Better Cotton Production Principles and Criteria version 2.0
- » Better Cotton Assurance Programme

At a minimum, verification organisations and verifiers must demonstrate the following core competencies for each country for which they seek to gain and maintain approval:

2.1. Qualifications:

Essential

- » University degree in agriculture, natural resources, environmental management or other relevant subject is encouraged but not required. Experience may substitute for education
- » 3 years of auditing or other work experience in (cotton) farming, natural resources or environmental management
- » Pass BCI third party verifier online and/or face to face training course every 3 years
- » Pass BCI third party verifier online and/or face to face refresher training specified by BCI
- » Witness at least two third party verification visits led by a qualified Lead Verifier for Large Farms / Producer Units as appropriate or where no existing qualified Lead Verifier is present in the organisation, be shadow verified by BCI staff for a verification visit during the first season of operating as a Third Party Verifier

- » Trained in auditing principles, procedures, techniques and behaviours as described in ISO 19011
- » Knowledge of national and local laws and regulations on the environment, labour, health and safety, land and water ownership in the country where the verification visits will take place
- » Knowledge of prevailing industry and cotton farming practices Knowledge of local social and cultural conditions to be considered in the conduct of a verification visit
- » Ability to communicate clearly in English both verbally and through the writing of verification reports

Desirable

- » Pass ISO 19011 auditing training course and/or ISO 9001/ISO 14001 Lead Auditor course or comparable local/ national alternative
- » Experience in identifying and gathering information from knowledgeable local organisations / individuals, including human rights, labour, environment, cotton or other leading local institutions that are likely to have the trust of farmers and workers and knowledge of local conditions

2.2 Competencies:

Demonstrate a good understanding of the Better Cotton Principles and Criteria

To be able to:

- » Describe the intent and requirements of the Better Cotton Principles and Criteria
- » Demonstrate an understanding of how the Ps and Cs apply to the local context
- » Assess PUs' and LF's compliance with the core and improvement indicators (where relevant)

Language

- » The ability to read and communicate effectively in the language(s) used by workers, community organisations, Learning Groups, Producer Units or others during the verification audit. If an interpreter is needed, s/he should ideally be independent from the organisation being verified.

Information Gathering From Local Knowledgeable Sources

To be able to:

- » Use knowledge gained from local sources to help create an effective verification approach that covers key relevant issues
- » Gather and report information in a way that does not compromise the independence of an organisation or its ability to conduct its work

Auditing Skills

To be able to:

- » Apply appropriate audit principles, procedures and techniques to the planning and execution of the third party verification so that the checks are conducted in a consistent, systematic, impartial and objective manner;
- » Conduct visual observation and surveillance in and around cotton farms and detect non-conformities with Better Cotton Production Principles and Criteria
- » Demonstrate the understanding and implementation of interviewing and facilitation techniques including the ability to:

- Approach and engage all those interviewed in a non-threatening and effective manner
- Interview workers in ways that enable the interviewer to pursue lines of inquiry, while allowing those interviewed to report their experiences
- Conduct interviews under conditions that reassure workers they can discuss sensitive issues
- Gather and report information in a way that does not subject the workers being interviewed to any negative consequences as a result of the interview
- » Identify non-conformities or potential non-conformities that may not be apparent in routine observation, including practices of concealment or deception
- » Maintain, where appropriate, the confidentiality of proprietary information, data, documents and records

Analysis and Reporting

To be able to:

- » Perform basic operational and data analysis i.e. the ability to do necessary computations and to understand proper relations between business rules and legal requirements for pesticide usage, wage computation and reporting
- » Verify the accuracy of collected information and be aware of the significance and appropriateness of the evidence collected to support the findings and conclusions of the third party verification
- » Prepare well-documented third party verification reports with clear analysis and specific evidence to support conformity / non-conformity findings

2.3 Other verification team members' qualifications and competencies:

- » Always carry out verification activities under the supervision of a BCI qualified Lead Verifier
- » University degree in agriculture, natural resources, environmental management or other relevant subject is encouraged but not required. Experience may substitute for education.
- » Trained by a qualified Lead Verifier on the BCI Principles and Criteria and refresher training as specified by BCI
- » Pass the third party verifier online exam every 3 years and pass BCI third party verifier refresher training as specified by BCI or demonstrate proof of training on BCI Principles & Criteria
- » Trained in auditing principles, procedures, techniques and behaviours as described in ISO 19011
- » Describe the intent and requirements of the Better Cotton Principles and Criteria
- » Demonstrate an understanding of how the BCI Principles and Criteria apply to the local context to the Lead Verifier's satisfaction

2.4 Third Party Verifier Organisation Responsibilities:

- » Report findings in a timely fashion, in English, using the reporting document prescribed by BCI
- » Commitment to maintain accountability for information gathered from the verification process and implementation of the commitment
- » Ensure the competency and on-going training of their verifiers
- » Ensuring a qualified Lead Verifier leads the third party verification and that other verification team members are effectively supervised by them

3. Application procedures

The application procedure for prospective 3rd party verifiers seeking BCI approval is made of **4 different steps**:

- » Send in the completed verifier application form
- » Participate in an interview with BCI
- » If recommended after the interview, participate in BCI training for verifiers as required and address any conditions required by BCI prior to approval
- » Successfully pass the verifier assessment at the end of the training program

3.1 Verifier application form

The first step for a prospective verifier is to submit the BCI verifier application form (see Annex I). Supporting documents (e.g. curriculum vitae, evidence of prior monitoring/verification work, evidence of approval/accreditation by other multi-stakeholder initiatives, etc.) must be provided together with the application form for review by BCI.

3.2 Interview

After submitting the written application, BCI staff will review the application and, provided the application meets the evaluation criteria, the technical manager or equivalent of a verification organisation) and proposed lead verifiers will need to be available for interviews (phone or face-to-face) with BCI staff and possibly a representative selected by the BCI Secretariat. The Better Cotton Principles and Criteria and BCI 3rd party verification methodology will be discussed in an oral interview with each applicant. The interviewers will be looking for evidence of the core competencies required of 3rd party verification organisations and verifiers described above and a commitment to the social and environmental goals of the Better Cotton Initiative. The interview will last between 30 minutes and one hour.

The BCI may also approach other stakeholders knowledgeable about the verifiers for references in addition to those listed by the verification organisation on their application form.

3.3 BCI verifier training program

Individual verifiers or verification companies with the relevant competencies, personal attributes, and supportive references will be invited to participate in the BCI verifier training organised by the BCI secretariat.

The training program for verifiers is made of 2 components:

- » **A face to face training workshop** Focused on the new standard (version 2.0), individual lead verifiers participate in the training program delivered by BCI (at their own cost in the case of in person training). It is obligatory for lead verifiers to attend the training before conducting third party verifications.
- » **An online assessment.** Following the workshop, an online assessment with questions on the topics covered will need to be passed by all Lead Verifiers before they can undertake third party verifications.

4. Approval

Verification organisations who have successfully completed the application process, addressed any additional conditions stipulated by BCI, had their Lead Verifiers attend the training workshop and passed the online training assessment, will be eligible to conduct 3rd party verification visits on the Better Cotton Principles and Criteria.

A certificate of approval will be provided by BCI to the verification organisation. The approval will be granted for a period of **3 years** with the verification organisation being subject to periodic review during that period and also required to take further training as detailed below.

The list of approved verification organisations (including logo, name, contact information) will be posted on the BCI website, noting the relevant country or region in which the verifier is approved to conduct 3rd party verification visits. Approved verification organisations may then be contracted by the BCI Secretariat, BCI country offices, BCI Strategic Partners, or by eligible cotton-producing farms¹ directly.

4.1 On-going Training

A distance learning program is being set up for third party verifiers on BCI's online training platform which will be mandatory for verifiers once released. Details of learning modules on specific topics covered by the BCI Principles and Criteria will be made available to the verifiers by BCI to strengthen their learning. Verifiers will also be required to conduct refresher training at least once every 3 years or more often as directed by BCI, for example in response to changes in BCI requirements. Verifiers will also be required to pass any assessments attached to these modules if they wish to continue as verifiers.

4.2 Training Programme

Verification organisations will need to implement an on-going training programme to ensure that all verifiers meet the Qualifications and Competencies requirements. BCI staff will need to conduct a review of this programme as part of the review process outlined below. Particular attention will be focused on the training material used, the qualifications of the trainers, the length of the training, and the frequency with which training is conducted, as well as the evaluation of trainees once the training is completed and on-going performance monitoring to ensure that trainees are competent to carry out third party verifications. It is extremely important that the verification organisation understands that they are directly responsible for verifier competency and performance. If the training program is not deemed satisfactory, BCI can require that only individuals trained by BCI conduct verification on behalf of the verification company.

5. Review and re-approval

5.1 Review

Periodic reviews of verifier performance will be undertaken by BCI, based on feedback from BCI country and assurance staff, partners and the external oversight process. This will include feedback on the quality of the verification visits undertaken in the field and the reports submitted.

¹ BCI (and its Strategic Partners in select countries) cover the cost of 3rd party verification for smallholder farms (up to 20 hectares) and medium farms (21 to 200 hectares). Large farms producing cotton on more than 200 hectares are responsible to pay for 3rd party verification themselves (in some limited cases this is covered by BCI's Strategic Partners for large farms).

Verifiers may also be subject to shadow verification visits by BCI or designated external consultants to provide additional feedback to help inform the review. A shadow verification is a visit conducted by the verifier in the presence of a BCI staff member or designated consultant observing how the different components of a 3rd party verification visit are performed by the verifier (conducting interviews with farmers, workers, documentation review, interview with management, or visual inspection of the farm).

Written feedback will be provided to the verifier by BCI after each shadow verification visit and a corrective action plan will be required in response to address any issues identified. BCI staff may shadow a verifier as often as necessary to ensure implementation of the corrective action plan. BCI staff may also request documentation from verifiers that the corrective action plan has been implemented.

Verification organisations may be placed on probation or have their relationship terminated prior to the end of the approval period based upon one or more of the following criteria:

- » Persistent poor quality of verification reports
- » Persistent delays in submitting verification reports to BCI
- » Poor quality of verification in practice or unprofessional or inappropriate conduct, as assessed by BCI or designated external consultants during shadow visits or based on feedback from PUs/ LFs and other BCI partners
- » Lack of responsiveness and commitment to BCI feedback and processes
- » Turnover and/or relocation of staff
- » Status of business relationship with the BCI
- » Status of contractual relationship with the BCI

Whenever BCI decides to place a verification organisation on probation or terminate the relationship based upon the above criteria, a formal communication shall be sent by the BCI Training and Assurance Manager to the verification organisation informing them of the decision and the reason, allowing for an opportunity to respond within the timeline specified by BCI. Where a corrective action plan is requested for verification organisations placed on probation, the organisation will need to provide details of the actions to be taken and the timeline for each for approval by BCI. In the event that the plan is not approved, or implementation of an approved plan subsequently fails to meet the specified timelines, BCI reserves the right to terminate the relationship with a verifier. No further verification visits will be assigned to verifiers on probation until a corrective action plan has been implemented.

Where BCI terminates the relationship with a verification organisation, the verification organisation's name shall be removed from the BCI website.

5.2 Re-approval

Verifiers will be considered for re-approval after a maximum of 3 years. Before making a decision on re-approval, BCI will undertake a thorough review of each approved verifier using the review processes highlighted above. At this time the verifiers shall: (i) disclose to the BCI any material change since the original application that may affect their independence or qualifications under the criteria; (ii) attend a refresher training program and an examination as deemed appropriate by BCI.

6. Complaints Against Verifiers

In the case of complaints against the conduct and/or performance of the third party verifiers, producers have the option of initiating the Appeals Process if they feel a licence has been incorrectly refused. There is also the [BCI Grievance Management Process](#) which can be activated by other BCI members and stakeholders formally involved in BCI to address concerns about verifiers.

APPROVAL PROCEDURES FOR VERIFIERS

ANNEX 1: APPLICATION FORM

Note to Applicants: Before completing this form, please be sure you have read, understood and agree to the application requirements for approval outlined in the BCI approval procedures for verifiers.

I. APPLICANT PROFILE

Name of the Organisation / Individual	
Contact name (please provide the name of the principal contact for BCI)	
Contact Title	
Address	
Contact telephone number	
Contact email	
Website (if any)	
Countries/Region for which you are seeking approval:	

II. Application Instructions

The purpose of this application is to provide the BCI with an understanding of the applicant’s ability and capacity to satisfy the core competency requirements of 3rd Party Verifiers outlined in the “BCI Approval Procedures for verifiers” document. Information requested in this application must be provided on a country or region-specific basis for each country or region where the company, organisation, or individual is seeking approval. Additional information may also be included as attachments to this application or mailed to the BCI.

1. Background of prospective verifier

- a. Please provide a brief history and description of your organisation, including the issues of focus and geographic scope of your activities.

- b. If available, please attach an organisational chart.

2. Verification Activities and Experience

- a. Provide a detailed explanation of proposed or current verification activities by the organisation and/or the proposed verifiers in the country where approval is sought showing responsibilities, procedures and tools used (if any).
- b. Submit a written record of the proposed verifiers' verification experience.
- c. Please attach examples of previous work that demonstrate verification, monitoring, reporting and communication capability, including, e.g. sample verification/monitoring reports, where possible with confidential content redacted if necessary.

3. Knowledge of local conditions

- a. In brief narrative form, provide evidence of your organisation's and verifiers' understanding of the local social and cultural conditions that may affect compliance with the Better Cotton Production Criteria, and affect farmers' and workers' ability to communicate with verifiers about compliance.

4. Knowledge of local laws and prevailing practices

- a. Describe your organisation's and/or proposed verifiers' knowledge of the relevant labour law and conditions in the country or region where you are seeking approval.
- b. Describe your organisation's or proposed verifiers' knowledge of the laws that are relevant to land use, land conversion, water use, water extraction, and registered pesticides for cotton; as well as conditions in the country or region where you are seeking approval.
- c. Describe the internal systems you have created to ensure that this knowledge remains accurate and current (i.e. a database of local laws, professional staff development, etc.).

5. Consultation with local knowledgeable sources

- a. Provide information describing your organisation's and/or proposed verifiers' experience of consulting with local knowledgeable sources on cotton production

practices, health and safety issues, workers' rights issues; such as NGOs, civil society organisations, and/or academic institutions in the country or region where you are seeking approval.

- b. Please provide a list of the groups whom you have engaged and describe the nature of the consultation in the country where approval is requested.

Groups you have engaged	Describe nature of consultation

6. Training

Provide details of:

- a. The training programme undertaken by the proposed verifiers including:
 - i. Auditing principles, procedures and techniques
 - ii. Better Cotton Standard and BCI verification procedures and tools
 - iii. details of the training materials used
 - iv. Trainer qualifications
 - v. Length and frequency of the training
- b. The system in place for evaluating the competency of verifiers and monitoring their on-going performance including the member of staff responsible for this.

7. Quality Control

Provide details of:

- a. the review process the organisation carries out on the initial findings of the verifier and the staff responsible for this review.
- b. The procedures in place to ensure that confidential information is managed appropriately.
- c. The procedures in place to ensure a review and continuous improvement in the implementation of the third party verification process.

8. Verifiers’ Qualifications and Competencies

- a. Provide detailed professional information (e.g. CV or résumé) about all personnel involved in the verification process (limited to one page per person if possible).
- b. Include specific background information that would demonstrate the competence of each individual to conduct BCI 3rd Party Verification and assess compliance with the Better Cotton Production Criteria (i.e. language skills, agriculture expertise, environmental expertise, specialised training or experience in child labour investigations, previous experience conducting farmer and/or worker interviews, previous experience working with BCI projects, etc.)
- c. Please include a gender breakdown of the proposed verification team.

NB Please note that all verifiers will need to be able to communicate clearly in English both through the writing of the verification reports and in responding to queries that the BCI Secretariat may have about these.

Personnel	Specific background information	Gender

9. Worker interview methodology

- a. Provide a detailed explanation of methodology used in conducting confidential worker interviews and the proposed verifiers’ experience of implementing this.

10. Farmer interview methodology

- a. Provide a detailed explanation of methodology used in conducting farmer interviews, in either or both smallholder and large farm contexts, as applicable and the proposed verifiers’ experience of implementing this.

11. References

- a. Please submit three or more references that will help us to understand the credibility and competence of you or your organisation.
- b. Please be sure to include the names of individuals to contact, and if available, an email address and telephone number for each reference.

Name	Contact Information

12. Fees

Position	Daily Fee

Note: A full Cost Proposal Form will have to be filled before BCI decides on the attribution of each Verification Visit. BCI will provide you with information about the location of the farms to be visited prior to asking you to prepare the Cost Proposal Form.

CERTIFICATION

I certify that the information contained in this Application and any attachments submitted as a part of this Application is true, complete and accurate.

Moreover, I will notify the BCI of any incident, situation or material change to the information submitted in this Application that may affect the ability of (Name of the Organisation / Individual) to meet the approval criteria for 3rd party Verifiers, as outlined in the BCI approval procedures for verifiers

Signed	
Position	
Date	