EXTERNAL ASSESSMENT GUIDANCE DOCUMENT

June 2018

This document presents detailed guidance for carrying out External Assessment in the context of the Better Cotton Standard System. It is applicable to individuals carrying out 2nd Party Credibility Checks (BCI country teams, Strategic Partners and Implementing Partners) or 3rd Party Verification (independent verifiers) as outlined in the Better Cotton Assurance Programme overview document.
# Table of Contents

1. **Introduction** .................................................................................................................................................. 3
2. **Preparation for External Assessment visits** ........................................................................................................ 4
3. **Detailed guidance on components of the External Assessment** ................................................................. 6
   3.1 Gathering information from local sources .......................................................................................................... 6
   3.2 Opening meeting / management interview ....................................................................................................... 9
   3.3 Farmer interviews ............................................................................................................................................. 10
   3.4 Visual inspection .............................................................................................................................................. 11
   3.5 Worker interviews ........................................................................................................................................... 12
   3.6 Documentation review ..................................................................................................................................... 13
   3.7 Closing meeting with Producer Unit / farm management .............................................................................. 14
   3.8 Analysis and reporting .................................................................................................................................... 14

Annex: General guidance on conducting interviews and focus group discussions ........................................ 16
1. Introduction

1.1 Background
Under the Better Cotton Standard System, a number of different forms of External Assessment are carried out on Producer Units (PUs) of smallholders or medium farms, and on Large Farms. These include:

» 2nd Party Credibility Checks (2PCC) by BCI staff (or Strategic Partners operating on behalf of BCI in partnership countries)
» 2nd Party Credibility Checks by Implementing Partners, and
» 3rd Party Verification by independent verifiers.

This guidance document is applicable to all types of External Assessment.

1.2 Reference documents
The following documents should be read before conducting an external assessment visit:

» Better Cotton Assurance Program Overview – this document provides a summary of the Better Cotton Assurance Programme, including sampling rates for assessment, grading of non-conformities, and

» Better Cotton Principles and Criteria v2.0 – this is the standard against which all Producers are assessed during External Assessment. It includes both Core Indicators and Improvement Indicators across the seven Better Cotton Principles. For Core Indicators, compliance is mandatory in order to be licensed to sell Better Cotton; whereas Improvement Indicators are not mandatory but are aimed at measuring continuous improvement over time.

The following documents are relevant during and after the External Assessment process:

» External Assessment Field Checklist (Smallholder, Medium Farms, Large Farms versions) – optional resource to guide the assessment process and record findings in the field.

» External Assessment Reporting Template (Smallholder, Medium Farm, and Large Farm-3PV and Large Farm 2PCC versions) – mandatory for all assessments.

1.3 Objectives of External Assessment
Under the Better Cotton Standard System, the general objectives of External Assessment are to:

» Verify Producer\(^1\) compliance with Core Indicators from the Better Cotton Principles and Criteria;

» Assess Producer performance against Improvement Indicators from the Better Cotton Principles and Criteria (relevant for 3PVs and BCI 2PCCs only);

» Support the Producer in identifying both areas that are going well and areas for improvement;

» For PUs to review the effectiveness of the Internal Management System;

\(^1\) 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.
» Identify and grade any non-conformities with Core Indicators and ensure that non-conformities are clearly communicated to the Producer, along with next steps and timelines to correct these; and

» Provide the BCI Assurance Managers with input into the licensing recommendation process for Producers.

2. Preparation for External Assessment visits

2.1 Timing and selection for assessments
External Assessment is carried out on a sample basis for PUs and Large Farms under the Group Assurance model. For individually participating Large Farms, 100% of farms receive 3rd Party Verification visits when they are due for licensing.

Please refer to the Better Cotton Assurance Programme document for further information on sampling rates and approaches.

The number of farms to be visited within each PU selected for external assessment is the following:

» In the case of smallholders: three Learning Groups are checked and five farmers per Learning Group, equalling 15 farmers per PU.

» In the case of Medium Farms: three medium farms are visited.

External Assessment should be conducted throughout the crop season, with an emphasis on the critical phases of the season (e.g. sowing, application of pesticides and harvest). While the actual visits need to be done independently of each other, Implementing Partners and BCI staff should plan their visits in collaboration, to ensure an appropriate schedule, and to avoid back-to-back or simultaneous visits to the same PU.

Although licensing decisions for Producers are made by the BCI Assurance Managers prior to harvest (based on the Self-Assessment and External Assessment reports) nevertheless some External Assessment should be conducted after the submission of the Self-Assessment report. These later visits are important to review performance related to issues such as fibre quality and worker conditions around harvest time, which are not possible to observe earlier in the season.

The duration of an External Assessment visit will depend on the geographical region and the size and complexity of the Producer. On average an assessment visit to a PU might take 3-4 days; Large Farms might take 1-2 days.

2.2 Selection of Learning Groups / farms:

In the case of 2nd Party Credibility Checks conducted by BCI, the selection of PUs to be visited is based on the PU risk assessment methodology. The risk assessment needs to be conducted at the beginning of the season once the final list of PU has been received. BCI will inform the PU in case they are selected for a visit one week before the visit. Within a PU, farms and Learning Groups are randomly selected. Information regarding which Learning Group or farmer will be visited should only be provided to the PU one day prior to the start of the visit.

In the case of 2\textsuperscript{nd} Party Credibility Checks conducted by the Implementing Partner, the PU to be visited are selected at random based on the sampling scale. 

In the case of 3\textsuperscript{rd} Party Verification, the BCI secretariat conducts the risk assessment methodology at the beginning of the season and identifies the PU to be visited. BCI is responsible for identifying, training and contracting the independent verifiers (see approval procedures for verifiers). The Terms of Reference provided to the verifiers will contain information about the location of the PU and farmers to be visited. Based on this information, the verifier will provide BCI with their consent to conduct the verification visit, a cost estimate form and an estimate of the dates when the visit can be scheduled. BCI will then confirm if the verifier is to undertake the verification visit and at what scheduled time. Based on the scheduled date of visit, BCI will inform the PU about the 3\textsuperscript{rd} Party Verification visit one week in advance of the actual date of the verification visit. The list of the selected Large Group or farmers will only be communicated one day prior to the visit.

2.3 External assessment visit components

Each of the following components is described at length in the next section of this document.

<table>
<thead>
<tr>
<th>STEP</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEP 1</td>
<td>Gathering information from local sources (for 3\textsuperscript{rd} Party Verification only)</td>
</tr>
<tr>
<td>STEP 2</td>
<td>Opening meeting / management interview</td>
</tr>
<tr>
<td>STEP 3</td>
<td>Farmer interviews</td>
</tr>
<tr>
<td>STEP 4</td>
<td>Visual inspection</td>
</tr>
<tr>
<td>STEP 5</td>
<td>Worker interviews</td>
</tr>
<tr>
<td>STEP 6</td>
<td>Documentation review</td>
</tr>
<tr>
<td>STEP 7</td>
<td>Closing meeting</td>
</tr>
<tr>
<td>STEP 8</td>
<td>Analysis and reporting</td>
</tr>
</tbody>
</table>
### 3. Detailed Guidance on components of the External Assessment

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

Building the capacity of farmers is at the core of BCI’s mission, and as a result, external assessment provides an opportunity for learning and continuous improvement. As a general rule applicable across all external assessment components, it is important that technical advice provided to Producers during any component of the assessment process follows guidelines to avoid conflicts of interest. In providing technical advice to farmers and Producers, assessors may:

- Provide explanations of the Better Cotton Principles and Criteria and clarify any misunderstandings of the Core Indicators or Improvement Indicators
- Review and comment on PU documentation and procedures
- Focus on highlighting good practices relevant to the Producer’s areas of improvement

Suggest or recommend approaches to implementation of the Better Cotton Principles and Criteria, or possible approaches to address non-conformities. In providing technical advice 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 licensing decision or licence duration during the assessment visit

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

#### 3.1 Gathering information from local sources

**KEY POINTS TO REMEMBER**

- This step is applicable only for 3rd Party Verification visits
- The objective is to conduct the verification in a locally appropriate manner addressing issues of local importance
- Verifiers shall contact at a minimum three local sources
- Reporting is done in the external assessment reporting template

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 is included.

» Sources through which local organisations can be identified include the BCI country teams, BCI Secretariat, NGOs with whom the verifiers 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. Some locations may have many knowledgeable groups, and others may not. These factors should be taken into account when determining the sufficiency of the outreach. Verifiers 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.

» Any information gathered about specific farms/growers should be used to heighten or lower the level of attention paid by the verifier. 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 take more prosaic forms, such as finding out 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 offer suggestions of other knowledgeable groups with which the verification team can meet.

» 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 verifier should compile all the information gathered in the external 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; the “freshness” of information provided, 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 BCI, 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 verifier’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 non-conformities to the Better Cotton Principles and Criteria or local law.

» Identification of the basis for such conclusions.

» Locations (farms, regions, villages etc.) where this issue is particularly significant.

» Changes in patterns of issues in recent times.

» Awareness of problems on the part of the local government and, if present, any actions to address it.

» Identification of particularly good practices on the Better Cotton Principles and Criteria or legal compliance.

» Identification of 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 contribute to high levels of non-conformities with the Better Cotton Production Principles and Criteria and/or local law.

3.1.7 Possible Sources for External Information

- 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
- Local or regional representatives of agricultural worker organisations, if they exist
- If appropriate, regional authorities and regional civil organisations

The verifier should interview/meet at least three organisations/individuals for external information gathering during each verification visit.

3.2 Opening meeting/management interview

| KEY POINTS TO REMEMBER | » Introduce all participants to the purpose and requirements of the visit |
| » For PUs, review the effectiveness of the Internal Management System |
| » Review Producer status against the Better Cotton Core Indicators (and Improvement Indicators where applicable) |
| » PU Manager or Farm Manager must be present |

The External Assessment starts with an opening meeting with the PU or Large Farm management team. Given their critical role in the Better Cotton Assurance 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 (observe business courtesy).
» Clearly explain the purpose and structure of the External Assessment visit.
» 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 Principles and Criteria.
» 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 and Improvement Indicators. 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 PUs, villages, categorisation of farmers, Learning Groups, number of farmers, etc.
» Participation in training delivered by BCI accredited trainer
» Training subsequently delivered to facilitators, farmers and workers
» Training 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.
» Awareness of the interviewee on the Better Cotton Principles and Criteria
» Awareness of the interviewee on the Better Cotton Assurance Programme
» Awareness of roles and responsibilities of the team members (in particular of the PU Manager and the Field Facilitators)
» Continuous improvement plan and performance against the plan
» Data management system in place
» Reporting on results indicators
» Enforcement of corrective actions resulting from monitoring activities
» Awareness of the self-assessment process
» Internal assessment process conducted by the PU manager (on 10% of LG or 10% of medium farms, for PUs only)
» Previous corrective actions prescribed
» General labour and agricultural practices adopted by farmers seeking to grow Better Cotton
» Any other activities that have been carried out so far in the field

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

3.3 Farmer Interviews

<table>
<thead>
<tr>
<th>KEY POINTS TO REMEMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>For PUs, aim is to review status of farmers against the Better Cotton Core Indicators (and Improvement Indicators when applicable)</td>
</tr>
<tr>
<td>Assess progress being made and status of implementation</td>
</tr>
<tr>
<td>Typically carried out through one-on-one interviews and focus group discussions</td>
</tr>
</tbody>
</table>

For PUs, 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 and Improvement Indicators. Farmers should be interviewed one-to-one and through Focus Group Discussion (see 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
» Motivation to adopt and promote social and environmental practices and labour welfare measures
» Effectiveness of the capacity building programme delivered by Implementing Partners
» Method and frequency of the training
» Level of adoption of more sustainable practices
» Documentation developed and/or maintained

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?
» Are you part of a producer organisation?
» Are your children helping you on your farm? What do they do?
» When do your children go to school?
» What data do you have to provide to facilitators?
» Can you read and write? What documentation is maintained at farm level?
» Did you receive a farmer field book?
» What are the actions being planned in the coming month to achieve compliance with the criteria?
» What type of training did you receive this season?
» What is Better Cotton?
» Did you receive any documentation in local language on best practices?
» What kind of protective equipment do you have access to on your farm?
» How do you dispose of your empty pesticide containers?
» What techniques do you use to manage your soil?
» What are you doing to improve the position of disadvantaged groups?
» In your producer organisation, are women holding a position of responsibility?

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

3.4 Visual Inspection

| KEY POINTS TO REMEMBER | » For smallholders: 15 farms (in three Learning Groups) need to be visited in each PU selected for external assessment  
  » For medium farm PUs, three medium farms need to be visited for each PU  
  » Assess work or agricultural management practices adopted on the farm in relation to the Better Cotton Principles and Criteria  
  » Observe if there are cases of non-compliance at farm level  
  » Take pictures or collect other evidence as needed to support findings in the External Assessment Report; especially for cases of non-conformity |

The exact length of the tour of the farm should be determined by the size of the farm and the time available; larger farms should have a longer tour, to ensure that as much of the farm is viewed as possible during the visit.
BetterCotton.org

Issues that can be assessed during visual inspections:

» Farmers 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

| KEY POINTS TO REMEMBER | » Key component of the external assessment to understand status of the Producer in relation to Decent Work
| | » One to one interview and focus group discussions
| | » Interviews should be carried out with different categories of workers

A representative sample of workers (when applicable) from all production areas should be selected for interviewing. Please ensure to interview as many women workers on the farms and workers who look young and 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 play any role in the selection of workers to be interviewed. The person conducting the assessment 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 at least 6 – 12 per village (in case of Learning Group) 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
» 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)
» Other binding contracts between the farmer and the worker (loans, mortgage, etc.) and their effect on forced 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 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 *External Assessment Field Checklist* for further questions that can be asked during worker interviews.

### 3.6 Documentation review

#### KEY POINTS TO REMEMBER

<table>
<thead>
<tr>
<th></th>
<th>For PUs, this is a key component to assess the Internal Management System put in place by the PU</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Documentation need to be checked at different levels (where applicable): farmer, Learning Groups, Field Facilitators, PU</td>
</tr>
</tbody>
</table>

The aim of 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 internal management system put in place by the Producer.

#### 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 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
» Procedure for checking the age of workers; age documentation
» Non-discrimination plan
» 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 *External Assessment Field Checklist* for further detail on records that can be reviewed to verify compliance with each indicator.

### 3.7 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 question 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
» Reiterate 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 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 External Assessment report and the timeline to close any non-conformities.

No written summary of the findings should be provided to the Producer at this stage.

### 3.8 Analysis and reporting

<table>
<thead>
<tr>
<th>KEY POINTS TO REMEMBER</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>» Cross-check the information collected in the different steps</td>
<td>» Compile the information from the external assessment field checklist in the external assessment report</td>
</tr>
<tr>
<td>» Ensure Producers receive the Non-Conformity report after the visit</td>
<td>» (note in the case of 3PVs this will be sent by BCI teams to the Producer)</td>
</tr>
</tbody>
</table>

The assessor must compare and contrast information received from desk based study, external sources and internal sources, including worker interviews, farmer interviews, documentation reviews, management systems review and visual inspection. Testimony, policies and documents must be crosschecked against visual inspection and actual practice. Conflicting findings must be sorted out through reiteration and further analysis. The assessor must thoroughly and objectively review a large body of information and make sound, objective, unbiased judgments concerning the status of the farmer and Producer against the Minimum and Improvement Requirements.

The results of the external visit are presented in the *External Assessment Reporting Template*. Different templates are provided for the report depending on the categories of farmers (smallholders, medium farms, and large farms). The external assessment report is to be...
completed after the visit has been finished. Only one report is completed per PU (covering three Learning Groups and 15 farms in the case of smallholders, or there medium farms).

The *External Assessment Field Checklist* is an optional resource that can be used to collect the necessary information while doing the visit in the field. The field checklist should be printed and filled during the visit. It will form the basis to prepare the external assessment report. The field checklist does not need to be sent to BCI. 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.
Annex: General guidance on conducting interviews and focus group discussions

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.

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 (better off-farm 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 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 Production Principles 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. A 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 a FGD

» Ensure that the issues / list of topics to be focussed on during the discussions are clear in your mind beforehand
» Ideally, there will 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
Consider having refreshments available for participants (away from the circle to avoid distractions during discussions)

Conducting a 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 however 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 verifiers during a 3rd party verification visit), the 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.