THE BETTER COTTON ASSURANCE PROGRAM

EXTERNAL ASSESSMENT GUIDANCE DOCUMENT

This document presents detailed guidance for carrying out external assessment in the context of Producer Unit licensing (smallholders and medium farms). It should be read carefully and applied by actors carrying out 2nd party credibility checks (BCI Country Managers, Strategic Partners, Implementing Partners) or 3rd party verification (independent verifiers) in the context of the Better Cotton Assurance Program. A separate document is available to support independent verifiers in carrying out 3rd party verification for large farms.

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1. Reference Material

The following documents should be read before conducting an external assessment visit.

- Better Cotton Assurance Program
- Better Cotton Performance Scale (smallholders or medium farms)
- Self assessment report (smallholders or medium farms)

The reporting tools available for the external assessment visit are:

Documents	Applicable to
External assessment report on Minimum Requirements	BCI Country Manager, Implementing/Strategic Partner, Independent Verifier conducting 2nd party credibility checks or 3rd party verification on Minimum Requirements
External assessment field book on Minimum Requirements	BCI Country Manager, Implementing/Strategic Partner, Independent Verifier conducting 2nd party credibility checks or 3rd party verification on Minimum Requirements
External assessment report on Improvement Requirements	BCI Country Manager/Strategic Partner conducting 2nd party credibility check on Improvement Requirements
External assessment field book on Improvement Requirements	BCI Country Manager/Strategic Partner conducting 2nd party credibility check on Improvement Requirements

The templates for the external assessment field book and report are different for each category of farmers (smallholders or medium farms)

The **external assessment field book** supports the BCI, partners or verifiers in collecting the necessary information while doing an external assessment in the field. It indicates to the Producer Unit the type of questions that the person conducting the assessment will ask to the PU, farmers or workers, the documents that will be reviewed, and what will be looked at during visual inspection. It should be printed and filled during the visit. While this field book does not need to be sent to BCI, it is the basis to prepare the **BCI external assessment report** that presents the information collected from the visit in a summarised form.

2. Summary

2.1 Objectives

The general objectives of external assessment in the context of Producer Unit licensing are to:

- Check in situ the status of Producer Unit and farmers against the Better Cotton Minimum and Improvement Requirements;
- Support the Producer Unit and farmers 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 compliance;
- Review the self assessment process;
- Enable corrective action to take place as soon as possible and enhance the likelihood of farmers producing Better Cotton;
- Provide the BCI Country Managers with a sufficient level of confidence to decide about whether to issue a licence to sell Better Cotton.

2.2 Actors

External Assessment is carried out by a number of actors:

- 2nd party credibility checks by Country Managers (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 external assessment process detailed in this document is applicable to both 2nd party credibility check and 3rd party verification visits.

2.3 Sampling Scale for smallholders and medium farms

PUs are selected for external assessment only in the season they are up for a new licence or up for a licence renewal.

	Minimum Requirements	Frequency of external assessment
2nd party checks by BCI Country Manager or Strategic Partner	50% of high risk PU 25% of average risk PU 10% of low risk PU at a national level during the season. At a minimum one PU per project is checked.	Annually for the PUs to be licensed*
2nd party checks by Implementing Partners	50% of PU during the season selected at random	Annually for the PUs to be licensed* (conducted separately from BCI checks)
3rd party verification conducted by BCI approved verifiers	Square root of the number of PU at country level, of which 50% are at random and 50% are based on a risk analysis conducted by the BCI secretariat.	Annually for the PUs to be licensed*

	Improvement Requirements	Frequency of external assessment
2nd Party Checks by BCI Country Manager or strategic Partner	10% highest performers at a national level (on the basis of the national performance report from the previous season)	Annually (highest performers are checked only once during the duration of the licence period)
3rd Party verification	None	

* when the licence first needs to be issued or renewal of the licence is due

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

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

2. 4 Timing

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, harvest). While the actual visits need to be done independently of each other, the Implementing Partners and the BCI Country Managers need to plan their visits in collaboration, to ensure an appropriate schedule, and to avoid back-to-back or simultaneous visits to the same PU. Though the decision as to whether a Producer Unit is licenced will be made by the BCI Country Manager 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 (to review fibre quality management issues and harvest labour issues, or to validate the duration of the licence in the case of Improvement Requirements); any corrective actions suggested from these visits need to be reviewed prior to the start of the next season. The time length of the visit will depend on the geographical region, whether it is medium farms or smallholders being verified. On average an external assessment visit to a Producer Unit lasts 3 to 4 days.

2.5 Preparing and conducting external assessment visits

PU information: The Producer Unit needs to submit to BCI the following information at the latest one month after sowing:

- Name of Producer Unit
- Location
- Address and contact details of the Producer Unit manager
- Contact details of Field Facilitators
- List of farmers (M/F) with expected seed cotton production
- List of Learning Groups in the case of smallholders
- Number of workers (M/F)
- Name of gins

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 Producer Unit 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. The 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 LG 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 2nd party credibility checks conducted by the Implementing Partner, the PU to be visited are selected at random based on the above sampling scale.

In the case of 3rd party verification, the BCI secretariat conducts the risk assessment methodology at the beginning of the season and identifies the PU to be visited. The BCI is responsible to identify, train and contract the independent verifiers (see Approval procedures for verifiers). The Terms of reference provided to the verifiers will contain information about the location of the Producer Unit and farmers to be visited. Based on this information, the verifier will provide BCI 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 Producer Unit about 3rd party verification visit one week in advance of the actual date of verification visit. The list of the selected LG or farmers will only be communicated 24 hours prior to the visit.

2.6 External assessment visit components

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

STEP 1	Gathering information from local sources (for 3rd Party verification only)
STEP 2	Opening meeting/interview with PU management
STEP 3	Farmers interview
STEP 4	Visual inspection
STEP 5	Workers interview
STEP 6	Documentation review
STEP 7	Closing meeting with PU management
STEP 8	Analysis and reporting

3. Detailed Guidance

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.

Please refer to the external assessment field book for indication on the type of questions to be asked to PU, farmers and workers, the list of documents to be reviewed and what should be looked at during visual inspection.

3.1 Gathering information from local sources

KEY POINTS TO REMEMBER	» This step is applicable only for 3rd party verification visit » The objective is to conduct the verification in a locally appropriate manner addressing issues of local importance » Verifiers shall contact at a minimum 3 local sources » Reporting is done in the external assessment report

The purpose of this element of the verification visit 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 through which such information is gathered may vary depending on the location, there are several steps that will likely be implemented in most locations. 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 Manager, 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 in 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 Production 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 Production 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 Production 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 3 organisations/individuals for external information gathering during each verification visit.

3.2 Opening meeting/ interview with PU management

KEY POINTS TO REMEMBER	» Introduce everyone to the purpose and requirements of the visit » Review the effectiveness of the Internal Management System put in place at Producer Unit level » Review status of Producer Unit against the Better Cotton Minimum Requirements (and Improvement Requirements when applicable) » PU manager must be present

The external assessment visit starts with an opening meeting with the officials in charge of the project and field staff. Given their critical role in the Better Cotton Assurance Program, the PU manager must be present during the entire meeting. There is always a need for an opening management interview in order to:

» Observe business courtesy
» Introduce the participants of the external assessment process
» Establish the requirements of the visit, including full access to all relevant documents, production locations, interview with relevant staff, etc.
» Review policies and procedures related to the implementation of the Better Cotton Production 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 Management

This meeting is to gain a general understanding of the Internal Management System put in place by the Producer Unit as well as the status of the Producer Unit against the Minimum and Improvement Requirements.

The interview with the management should look into the following areas:

» Organisation of project team (coordinator, senior staff/advisors, PU manager, field facilitators, etc.)
» Field operational set up: Number of PU, 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: FFS, 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 Production Principles and Criteria
- Awareness of the interviewee on the Better Cotton Assurance Program
- Awareness of roles and responsibilities of the team members in particular of the PU manager and the Field Facilitators
- Continuous improvement plan in place in the Producer Unit
- 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)
- Previous corrective actions prescribed or developed
- General labour and agricultural practices adopted by farmers seeking to grow Better Cotton
- Plans and procedures and documentation developed at the Producer Unit level.
- Any other activities that have been carried out so far in the field

For full list of questions to be asked to PU management, see external assessment field book on Minimum and Improvement Requirements for smallholders and medium farms.

3.3 Farmers Interview

KEY POINTS TO REMEMBER	» Review status of farmers against the Better Cotton Minimum Requirements (and Improvement Requirements when applicable) » Assess progress being made and status of implementation » One to one interview and focus group discussions

A 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 Minimum Requirements and Improvement Requirements (when applicable), the status of implementation of the project plans with respect to the farmers, and the progress being made by the farmers in their implementation of the practices being promoted by the project. Farmers should be interviewed one-to-one and during 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:

- Their understanding of the Better Cotton Production Principles and Criteria
- Motivation to adopt and promote social and environmental practices and labour welfare measures
- Effectiveness of the capacity building program delivered by Implementing Partners
- Method and frequency of the training delivered by the Producer Unit
- Level of adoption of more sustainable practices promoted by the Producer Unit

- Documentation developed and/or maintained

Sample questions on Minimum Requirements

- 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 you 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?

Sample questions on Improvement Requirements

- 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?

For full list of questions to be asked to farmers see external assessment field book on Minimum and Improvement Requirements for smallholders and medium farms.

3.4 Visual Inspection

KEY POINTS TO REMEMBER	» For smallholders, 15 farms (in 3 Learning Groups) need to be visited in each PU selected for external assessment » 3 medium farms need to be visited in each PU selected for external assessment » Assess work or agricultural management practices adopted on the farm in relation to the Better Cotton Minimum and Improvement Requirements » Observe if they are cases of incidental or systemic non compliance at farm level » Take pictures to support the report

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.

Key issues to be addressed during field visit:

- 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.

For full list of what to look at during visual inspection see external assessment field book on Minimum and Improvement Requirements for smallholders and medium farms.

3.5 Workers Interview

KEY POINTS TO REMEMBER	» Key component of the external assessment to understand status of the Producer Unit in relation to Decent Work » One to one interview and focus group discussions » Interview should be made 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 Unit 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 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.

Key issues to be addressed during worker interviews:

- Family or hired labour
- 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 assesors 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 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

For full list of questions to be asked to workers see external assessment field book on Minimum and Improvement Requirements for smallholders and medium farms.

3.6 Documentation review

KEY POINTS TO REMEMBER	» Key component to assess the Internal Management System put in place by the Producer Unit » Documentation need to be checked at different levels: farmer, Learning Groups, field facilitators, Producer Unit

In addition to the field visits and interviews with farmers and workers, **documentation** needs to be reviewed. The purpose 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 Unit manager.

Example of documents to be reviewed

Minimum Requirements

- IPM plan
- List of pesticides nationally registered for cotton
- List of pesticides used in the PU, if available
- Training and awareness raising material for facilitators and farmers/workers
- Best practices record
- PU internal policies and procedures
- Child labour plan

» Procedure for checking the age of workers
» Non-discrimination plan
» Training records
» Producer Unit data and farmer list
» Continuous Improvement Plan or equivalent internal policies and procedures
» Workers protocol, list of workers
» Data management system
» Farmer Field book template and distribution records
» Internal assessment report
» Corrective action forms
» Monitoring report
» Results Indicators report from previous season
» Pesticide application records
» Age documentation

Improvement Requirements

» Dissemination material in local language on best practices
» IPM policy/instructions covering the 5 principles
» PU records on estimated level of adoption
» Training/awareness raising material for farmers/workers
» List of pesticides used in the unit
» PU policy on the use of dangerous pesticides
» Distribution records of PPE
» Internal policies and procedures
» Recommended Management practices on soil fertility
» MoU, partnership agreement between partners on decent work
» Child protection committees records
» Written code of conduct/ policy on non-discrimination and child labour
» Producer organisation records

For full list of documents to be reviewed see external assessment field book on Minimum and Improvement Requirements for smallholders and medium farms.

3.7 Closing meeting with PU management

On completion of the visit, the person conducting the assessment needs to extend basic courtesies to the PU management by scheduling a final meeting with them. In this meeting, assessors have a final opportunity to gain clarity on policies and practices, particularly when there have been instances in which the data collection activities have uncovered conflicting information or evidence. The closing meeting is also the opportunity to:

» Acknowledge the cooperation of the management in providing relevant information and access to documents, farms, farmers and workers;
» Reiterate the purpose of the visit;
» Explain when the report will be provided and what will be included in it

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

3.8 Analysis and reporting

KEY POINTS TO REMEMBER	» Crosscheck the information collected in the different steps » Compile the information from the external assessment field book in the external assessment report » Ensure Producer Units receive Corrective Action Plan after the visit

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 sift through 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.

Reporting Tools

The results of the external visit are presented in the **external assessment report**. Different templates are provided for the report depending on the categories of farmers (smallholders or medium farms) and the type of requirements to be checked (Minimum or Improvement). The external assessment report has to be filled in after the visit has been finished. It should not be used as a checklist at the time of the visit. Only one report is filled per Producer Unit (covering 3 LGs and 15 farms in the case of smallholders, or 3 medium farms).

The **external assessment field book** should be used to collect the necessary information while doing the visit in the field. The field book should be printed and filled during the visit. It will form the basis to prepare the external assessment report. The field book does not need to be sent to BCI. During the visit, pictures should also be taken to support the report (e.g. document related to BCI, good practices, working conditions, etc.). The external assessment field book contains the following section:

- General information about the visit
- Producer Unit management interview & documentation review at PU level
- Farmer interview & documentation review at Learning Groups/Farmer level
- Workers interview
- Visual inspection

The answers to the different questions in the field book are then presented in summarised form in the external assessment report. The external assessment report is an excel document containing different worksheets:

TAB1. Summary information

This section presents the general information about the assessment (who conducted the visit, name of PU, Learning Groups and farmers, etc.), the information gathered from local sources in the context of 3rd party verification, and the summary evaluation of the visit (i.e. the level of compliance with the Minimum Requirements at the time of the visit, or if the duration of the licence is validated in the case of Improvement Requirements).

TAB2. Minimum or Improvement Requirements

For external assessment visits on Minimum Requirements, this section presents, for each Minimum Requirement (Minimum Production Criteria, Management Criteria and reporting on Results Indicators), the level of compliance observed at the time of the visit. It indicates the means of verification available for each criterion (e.g. documentation review, farmers interview, workers interview, visual inspection, or management interview).

For external assessment visits on Improvement Requirements, this section presents, for each Improvement Requirement, if the person conducting the assessment validates the self assessment results. The means of verification available for each Improvement Requirement (e.g. documentation review, farmers interview, workers interview, visual inspection, or management interview) is also presented.

TAB3. Corrective action Plan

This tab indicates the summary of findings and corrective actions: the critical issues to be addressed and by whom (farmers, facilitators, PU managers, Implementing Partners). This part of the report is sent to the Producer Unit after the visit in accordance with the timing presented in the table below:

2nd party checks conducted by BCI (or Strategic partner)	The person conducting the assessment needs to fill the corrective action plan and send it directly to the Producer Unit within 2 weeks of completing the visit
2nd party checks conducted by the Implementing Partner	The person conducting the assessment needs to fill the corrective action plan and send it directly to the Producer Unit within 2 weeks of completing the visit. A copy of the CAP needs to be sent to the BCI Country Manager (or Strategic partner operating on behalf of BCI)
3rd party verification	The corrective action plan will be filled by BCI based on the external assessment report provided by the verifier. The report needs to be submitted to BCI within 8 days after the visit is completed. The BCI will submit the CAP to the Producer Unit within 2 weeks after receiving the report from the verifier.

Please refer to the Better Cotton Assurance Program for information on decision-making and the criteria to disqualify an entire Producer Unit.

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.

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.

2. 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 any one 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.