Better Cotton Remote Assessment Process

Applicable for Smallholder and Medium Farm Producer Units (PUs)

V1.1 February 2022

Overview

The remote assessment should generally cover similar content as an on-site assessment; however, it requires key documents to be shared by the farmer ahead of time, and then a follow-up interview with the Producer Unit (PU) manager along with a sample of workers.

The remote Licensing Assessment or Surveillance Assessment ("Assessment") consists of the following elements:

1. Assessment Planning and Preparation
2. Documentation Review
3. Opening Meeting and PU Manager Interview
4. Field Facilitator Interviews
5. Farmer Interviews
6. Worker Interviews
7. Initial Analysis and Reporting
8. Closing Meeting
9. Analysis and Reporting

The remote assessment is conducted over a period of approximately 2.5 days according to a pre-planned schedule of activities which is coordinated directly with the PU Manager.

During the assessment window, the PU Manager should aim to be as available as possible by phone and/or email in order to support the assessor with documentation requests, etc. While the assessment is taking place, the assessor reserves the right to request that documents are submitted within a 2-hour timeframe.

During the Assessment, assessors are to flag areas that need follow-up or could not be fully verified; these should be checked the following season either through a remote or in-person follow-up. If a significant number of areas cannot be verified, the assessor may recommend the PU for a mandatory surveillance assessment the following season.

The term 'assessor' applies to either an approved third-party verifier or a qualified Better Cotton team member who carries out Licensing Assessments or Surveillance Assessments.

Reference Material: This document outlines the process steps for conducting a remote assessment. Detailed guidance on assessment components can be found in the Better Cotton Assessment Process document. Although not all aspects of the Better Cotton Assessment Process document are applicable to the remote assessment, many components remain relevant.
1 Assessment Planning and Preparation

1.1 Prior to the assessment, the assessor should notify via email the PU Manager (with the IP Coordinator in copy) that their scheduled assessment will be conducted using the remote assessment process.

1.2 This email should also include the following information:
   a) An overview of the components of the assessment and the schedule of activities during the assessment period, including dates for interviews
   b) A Documentation Request list specifying all documents and records the PU Manager must submit in advance of the assessment, and required date of submission
   c) Notification that an additional sample of records will be requested from the PU Manager at the start of the Documentation Review (and due to be submitted on the same working day)
   d) The Dropbox pathway (or equivalent) for the PU Manager to use for the submission of documents and requested evidence, and instructions for use
   e) The Remote Assessment Process document, as an attachment to the notification email (this document).
   f) A request that the PU Manager notify all Field Facilitators (FF) to be available during the dates identified for the assessment
   g) A request for the contact information (phone number and/or skype id) for all Field Facilitators in the PU
   h) A request for the PU Manager to confirm the appropriate communication platform for the PU Manager, Field Facilitators, and farmers to participate in remote interviews via skype, whatsapp, facetime, etc.

Better Cotton has developed a template for the above email – located here. The email should be sent a maximum of two weeks and a minimum of one week before the planned remote assessment.

The email should outline date for the documentation submission, so the assessor has these in advance of the Documentation Review phase. An example would be the email gives the PU Manager 3 days or one week to organise and submit all documentation.

1.3 As part of the preparation phase, the assessor is to gather and review the following documents:
   a) Most recent assessment report(s), Corrective Action Plan (if applicable), and Improvement Recommendations, as well as any evidence of incidental non-conformity closure
   b) PU’s self-assessment report for the current season

1.4 Reviewing the documents listed in sub-clause 1.3 will help the assessor understand the strengths and weaknesses of the PU. The assessor should also note any previous non-conformities or risk areas to focus on during the assessment process and to help frame interview questions during the assessment process.
2 Documentation Review

2.1 The Documentation Review process, as the second step, is to review the documents submitted to assess their quality, comprehensiveness, and relevance.

2.2 The PU Manager is to submit documentation as per a pre-agreed deadline with the assessor.

The medium and date of documentation submission is to be agreed between Better Cotton Country Teams and the Producer. An example could be one week from the request email (step 1.1) and submitted into a pre-designated Dropbox folder.

Where a PU Manager is unable to meet the deadline, they must send an email to the assessor in advance of the submission date outlining the rationale for delays. Any deadline extensions will be up to the assessor’s judgement; based on the rationale provided. In cases where the rationale is insufficient, the assessment will be considered as incomplete and the licence will be denied.

2.3 The objectives of the documentation review step are to:
   a) cross-check content of plans and policies against indicator requirements
   b) assess relevance, strength and detail of plans and policies
   c) assess relevance and achievability of training plan
   d) assess relevance and usability of training materials
   e) assess efficacy and functionality of Internal Management System according to PU monitoring and adoption records
   f) select farmer sample to interview remotely (3 LGs and 5 farmers per LG for smallholders or 5 farmers for medium farms)
   g) prepare for interviews with PU Manager, Field Facilitators, and farmers

In addition to the standardised Documentation Request list and records sample (see Annex I), additional examples / samples may be requested by the assessor during the scheduled remote assessment.

2.4 The documentation review informs the focus areas for remote interviews with the PU Manager, Field Facilitators, and farmers. As part of reviewing the documentation, the assessor identifies areas to discuss with interviewees to ensure that documents are well-understood, actively used, and effectively implemented.

2.5 At the start of the Documentation Review, the assessor should request that the PU Manager should submit a specific sample of Farmer Field Books and practice adoption records to the Dropbox folder (or equivalent). The sample of FFBs and adoption records must be submitted by the end of day (to be outlined in sample request communication).

The assessor is to cross-check the FFB information to the PU Training Plan and evidence shared via the FF interviews and farmer interviews.
3 Opening Meeting and PU Manager Interview

3.1 The assessment starts with an opening meeting. The opening meeting provides an opportunity for the assessor, PU Manager, and any participating Field Facilitators to introduce themselves. As part of the opening meeting, the assessor will also review the plan for the visit and answer any questions.

3.2 Following the opening meeting, the assessor begins the PU Manager interview. The focus of the PU Manager interview is the cross-checking of the documentation against the PU Manager’s knowledge and understanding of the PU’s operation and performance level.

A reminder can be sent to the PU Manager one day prior to the interview, reminding them of the date and time and the communication method i.e. skype or phone call.

3.3 The objectives of the PU Manager interview are to:
   a) understand the current performance of the PU, including progress to date and any challenges faced
   b) assess the level of knowledge of the PU Manager on key areas of the P&C and Continuous Improvement Plan (CIP); identify strengths and improvement areas
   c) understand the development process for the PU’s CIP / management plans
   d) assess relevance of the PU’s CIP / management plans
   e) ask clarifying questions around the structure and effectiveness of the Internal Management System

3.4 The opening meeting and remote interview with the PU Manager are to be conducted via a one-on-one discussion.

As much as possible, the assessor should aim to use video while conducting remote interviews. Where video is not possible, voice calls can be conducted as a substitute.

Where connectivity and network allow, Field Facilitators can join the Opening Meeting. Although it is not a formal requirement of the Better Cotton Remote Assessment process.

3.5 At the end of the PU Manager interview, the assessor informs the PU Manager of the Field Facilitators, Learning Groups and Farmers that have been selected for remote interviews and confirms contact details and communication methods (where needed).

For smallholder PUs, the assessor should select 3 Learning Groups, their responsible Field Facilitators and 5 farmers per LG. For medium farm PUs, the assessor should select a minimum of 5 farmers and their responsible Field Facilitators.

3.6 If the LGs selected for Field Facilitator and Farmer interviews were not included in the training participation and adoption record sample and/ or the FFB sample (as part of the initial Documentation Review component), the assessor requests that the PU Manager submit these records within 2 hours.

3.7 At the end of the PU Manager interview, the assessor may request additional documentation for further review.
4 Field Facilitator Interviews

After completing the PU Manager interview, the assessor should notify the Field Facilitators plus any additional FFs selected for interview directly (by text, email, or phone) of the scheduled interview. The assessor should also share the following information:

- The planned day and rough time windows (i.e. Monday in the morning) for the FF interview.
- A request that the FF coordinate directly with the 5 farmers selected in their LG to confirm inform them of an estimated time windows for phone interviews (applicable to the FFs responsible for the LG sample only)

4.1 Field Facilitator interviews are to be conducted as one-on-one discussions.

As much as possible, the assessor should aim to use video while conducting remote interviews. Where video is not possible, voice calls can be conducted as a substitute.

4.2 The assessor is to conduct interviews with 50% of Field Facilitators in the PU, or a minimum of 3 Field Facilitators.

The interview sample includes the 3 Field Facilitators responsible for the LG and farmer sample, plus any additional FFs selected at random to reach 50% (where possible). The selection of additional FFs to interview can be done using the FF contact list provided prior to the assessment.

4.3 The objectives of the remote Field Facilitator interviews are to:

- a) cross-check the information provided in the PU Manager interview regarding management plan development and implementation, training, adoption levels, etc.
- b) cross-check documentation on training participation and adoption levels
- c) assess Field Facilitators’ knowledge level and understanding of the PU’s management plans
- d) determine Field Facilitators’ knowledge level of the most critical sustainability issues in the LGs they oversee
- e) determine the competence of Field Facilitators in delivering training and utilising various training methodologies
- f) assess levels of field involvement and frequency of farm-level monitoring
- g) assess the implementation of the data management system

4.4 Based on the Field Facilitator interview and documentation cross-check, the assessor may request additional documents for further review from the PU Manager.

4.5 At the end of the interview with each Field Facilitator, the assessor re-confirms farmer contact details and agrees the process and plan for farmer interviews with the FF (applicable only to the 3 FFs associated to the LG sample).
5 Farmer Interviews

For smallholder PUs, farmer interviews are conducted with 5 farmers per LG, resulting in a total of 15 farmers. For medium farm PUs, farmer interviews are conducted with a minimum of 5 farmers.

If any of the farmers identified in the original sample cannot be reached, the assessor must continue contacting farmers within the LG samples until they have success. If additional farmers are available during the interview window the FF can facilitate conversations with additional farmers.

5.1 Farmer interviews are primarily conducted as one-on-one discussions by phone (in some cases, video may be available).

As much as possible, the assessor should aim to use video while conducting remote interviews. Where video is not possible, voice calls can be conducted as a substitute.

Ideally the assessor conducts the remote interview directly with the farmer. However, there may be language and/or technology barriers which would require PU Manager or FF intervention and support.

At the start of each interview, the assessor should aim to confirm farmers’ identity, i.e. via their address or their father’s surname.

5.2 Farmer calls are coordinated by the assessor. IP staff may observe but they cannot intervene, unless specifically requested by the assessor.

a) In specific circumstances, at the assessor’s discretion, the direct calls with farmers may take place without IP staff.

b) Where IP staff are present as silent observers, they may be requested by the assessor to facilitate introductions.

5.3 The objectives of the farmer interviews are to:

a) Cross-check the information provided in documentation, the PU Manager interview, and FF interviews

b) Cross-check training participation records and practice adoption records

c) Cross-check FFB content, and check farmer understanding of FFBs

d) Assess relevance of management plans based on critical production / sustainability issues identified by the farmer

e) Assess farmer participation levels in PU activities and training; determine levels of engagement and awareness

f) Assess effectiveness of training delivered by FFs; determine whether farmers have adopted new practices and can demonstrate understanding of key concepts

5.4 Based on the farmer interview and documentation cross-check, the assessor requests any additional documents for further review from the PU Manager
6  Worker Interviews

It is important that the assessor attempts, where possible, to remotely interview a range of workers across LGs and/or farmers to understand the status of the Producer in relation to Decent Work.

6.1 Worker interviews should be conducted as one-on-one discussions.

As much as possible, the assessor should aim to use video while conducting remote interviews. Where video is not possible, voice calls can be conducted as a substitute.

6.2 The objectives of the worker interviews are to:
   a) Cross-check the information provided in documentation and interviews with PU Manager and Field Facilitators
   b) Assess relevance and implementation of management plans related to Decent Work, including time-bound plans on child labour and disadvantaged groups (for smallholder PUs)
   c) Cross-check training participation records and practice adoption records, with attention to Decent Work indicators
   d) Assess effectiveness of training delivered and workers’ understanding of key concepts

6.3 The selection of workers ideally should be independent, however, as part of the remote licensing assessment process, it is recognised that the assessor may need to go through the Field Facilitators and/or farmers for the selection of workers.

With the format of the remote licensing assessment process, there is the flexibility to contact the workers a week later if they will be at the farm i.e. applying pesticides or harvesting cotton.

6.4 Farmers, PU staff or IP representatives should not be present as part of the interview to compromise the worker’s ability to answer freely.

Where there are language and/or technology barriers exists, alternative approaches will need to be implemented. This format could be through a trained IP Representative (independent from this Producer) conducting worker interviews later in the season. This transcript would be shared with the assessor to incorporate and update the assessment report where appropriate.

7  Initial Analysis and Reporting

7.1 After completing the documentation review and interviews, the assessor revisits the PU’s documentation, compiled notes and findings to analyse evidence and commence with reporting.

The suggested timeframe for the Initial Analysis and Reporting phase is approximately one day. During this time, the assessor may contact the PU Manager with follow-up questions and any final documentation requests
7.2 A key deliverable of this step is for the assessor to prepare a short, written summary of the findings to discuss with the PU Manager during the closing meeting (using the Better Cotton template).

8 Closing Meeting

The schedule for the closing meeting should be confirmed in advance, ideally during the Opening Meeting with the PU Manager.

8.1 The closing meeting is conducted as a one-on-one discussion with the PU Manager by video or phone.

Where connectivity and network allow, Field Facilitators can join the Closing Meeting. Although it is not a formal requirement of the Better Cotton Remote Assessment process.

8.2 The closing meeting provides an opportunity for the assessor to thank the PU Manager for their cooperation during the assessment and provide clear feedback in advance of sharing the assessment report.

8.3 During the closing meeting, the assessor shares with the PU Manager the initial set of key findings outlined in the short, written summary. This includes both positive elements of the PU’s performance and areas where improvement is needed. This summary is to be shared via email with the PU Manager once the Closing Meeting concludes.

9 Analysis and Reporting

The analysis and reporting step for a remote Licensing Assessment follows the process outlined in section 3.8 of the Better Cotton Assessment Process document.

9.1 Key deliverables of this step are the Assessment Report, Corrective Action Plan (where required) and the PU Progress Matrix.

a) The completed report and Corrective Action Plan (where required) is to be shared with the PU Manager and Better Cotton within 3 weeks of the assessment.

b) The completed PU Progress Matrix is to be shared with Better Cotton within 3 weeks of the assessment.

Better Cotton acknowledges that it may be difficult to fully evaluate the overall effectiveness of the PU and its staff via a remote assessment. Nonetheless, the completion of the PU Progress Matrix is a core requirement of the remote licensing assessment process.

9.2 The assessor is to complete a risk assessment for each Producer to flag areas that need follow-up or could not be fully verified and provide recommendations for the follow up. This is to be shared with Better Cotton along with the Assessment Report (within 3 weeks of the assessment).
Annex I. Documentation and Records

Ia. Documentation Review List

The following list of documents must be submitted to the assessor by the outlined date prior to the start of the scheduled assessment.

Training and Internal Assessment documents:
- PU Training Plan
- Sample of Training Materials per indicator (photographs acceptable)
- Sample of local language dissemination material (photographs acceptable)
- 50% of Internal Assessment reports (scanned or photographed)

Management and Phase-out Plans:

Note: Management Plans may be submitted as integrated sections of the CIP, or as separate documents, depending on the PU’s approach to plan development.

- Continuous Improvement Plan
- Integrated Pest Management Plan
- Phase-out Plan for Pesticides listed under GHS Category 1; WHO Ia
- Phase-out Plan for Pesticides listed under GHS Category 2; WHO Ib
- Phase-out Plan for Pesticides defined as carcinogenic, mutagenic, or reprotoxic (CMR) substances according to GHS Ia and Ib
- Soil Management Plan
- Biodiversity Management Plan
- Water Stewardship Plan
- Time-bound Plan for the Prevention of Child Labour
- Time-bound Plan to Improve the Position of Disadvantaged Group (for SH only)

Management Plan Supporting Documents:

- Scoping / survey records on pesticide use
- List of Pesticides Nationally Registered for use on Cotton
- Use of Natural Substances Survey (if applicable)
- Soil testing plan and results
- Soil type mapping (for MF only)
- Biodiversity Mapping
- Documentation of any degraded areas (if applicable)
- Water Resource Mapping
- Scoping / survey records on child-labour
- Scoping / survey records on disadvantaged groups (for SH only)
Other required documents:

- Child Labour Policy
- PU level profile of the farm labour force
- Sample of wage slips and/or payment records (if available)

Ib. Data Management, Training and Adoption Records

At the start of the Documentation Review, the assessment will request from the Farm Manager a specific sample of data management, training participation, and adoption records. The records sample must be submitted to the assessor within the same working day.

- Training participation records for 20% of LGs (to be specified by assessor)
- Practice Adoption records for 20% of LGs (to be specified by assessor)
- Photographs or scans of FFBs for XX farmers in X LGs (to be specified by assessor)
- Consolidated data sample