

Better Cotton Remote Assessment Process

Applicable for Large Farms (LFs)

V1.2 March 2024

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 farm 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 Farm Manager Interview
4. Worker Interviews
5. Initial Analysis and Reporting
6. Closing Meeting

The remote assessment is conducted over a period of approximately 2 days according to a pre-planned schedule of activities which is coordinated directly with the Farm Manager.

During the assessment window, the Farm 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 Producer for a mandatory surveillance assessment the following season.

The term ' assessor ' applies to an approved third-party verifier carrying 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 Farm Manager (with the PP Coordinator in copy, if applicable) 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 Farm Manager must submit in advance of the assessment, and required date of submission
 - c) The Dropbox pathway (or equivalent) for the Farm Manager to use for the submission of documents and requested evidence, and instructions for use
 - d) The *Remote Assessment Process* document, as an attachment to the notification email (this document).
 - e) A request for the Farm Manager to confirm the appropriate communication platform to participate in remote interviews via skype, whatsapp, facetime, etc.

Better Cotton has developed a template for the above email. 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 Farm Manager 3 days 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) and Corrective Action Plan (if applicable)
 - b) The Farm'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 LF. 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 Farm 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 three days or one week from the request email (step 1.1) and submitted into a pre-designated Dropbox folder.

Where the Farm 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 (where relevant)
 - d) assess relevance and usability of training materials (where relevant)
 - e) assess efficacy and functionality of Internal Management System
 - f) prepare for interviews with Farm Manager and workers (where relevant and possible)

In addition to the standardised Documentation Request list ([see Annex 1](#)), 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 Farm Manager and workers (where relevant and possible). 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.

The assessor is to cross-check the training information and evidence shared via the worker interviews (where relevant).

3 Opening Meeting and Farm Manager Interview

- 3.1 The assessment starts with an opening meeting. The opening meeting provides an opportunity for the assessor and Farm Manager 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 Farm Manager interview. The focus of the interview is the cross-checking of the documentation against the Farm Manager's knowledge and understanding

A reminder can be sent to the Farm 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 Farm Manager interview are to:
- understand the current performance of the Large Farm, including progress to date and any challenges faced
 - assess the level of knowledge of the Farm Manager on key areas of the P&C and Continuous Improvement Plan (CIP); identify strengths and improvement areas
 - understand the development process for the Large Farm's CIP / management plans
 - assess relevance of the CIP / management plans
 - ask clarifying questions around the structure and effectiveness of the Internal Management System

- 3.4 The opening meeting and remote interview with the Farm 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.

- 3.5 At the end of the interview, the assessor may request additional documentation for further review.

4 Worker Interviews

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

- 4.1 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.

- 4.2 The objectives of the worker interviews are to:
- Cross-check the information provided in documentation and the Farm Manager interview
 - Cross-check training participation records and practice adoption records (where relevant)
 - Assess relevance of management plans based on critical production / sustainability issues identified by the farmer
 - Assess worker participation levels in farm activities and training; determine levels of engagement and awareness (where relevant)

- e) Assess effectiveness of training delivered and can demonstrate understanding of key concepts (where relevant)
- 4.3 The selection of workers ideally should be independent, however, as part of the remote assessment process, it is recognised that the assessor may need to go through the Farm Manager to do so.
- 4.4 The Farm Manager or IP representatives (where relevant) 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 conducting worker interviews later in the season. This transcript would be shared with the assessor to incorporate and update the assessment report where appropriate.

- 4.5 Based on the worker interviews and documentation cross-check, the assessor requests any additional documents for further review from the Farm Manager.

5 Initial Analysis and Reporting

- 5.1 After completing the documentation review and interviews, the assessor revisits the farm'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 Farm Manager with follow-up questions and any final documentation requests

- 5.2 A key deliverable of this step is for the assessor to prepare a short, written summary of the findings to discuss with the Farm Manager during the closing meeting (using the Better Cotton template).

6 Closing Meeting

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

- 6.1 The closing meeting is conducted as a one-on-one discussion with the Farm Manager by video or phone.
- 6.2 The closing meeting provides an opportunity for the assessor to thank the Farm Manager for their cooperation during the assessment and provide clear feedback in advance of sharing the assessment report.
- 6.3 During the closing meeting, the assessor shares with the Farm Manager the initial set of key findings outlined in the short, written summary. This includes both positive

elements of the farm's performance and areas where improvement is needed. This summary is to be shared via email with the Farm Manager once the Closing Meeting concludes.

Refer to section 8.3.1 of the Better Cotton Assurance Manual v4.0, and 3.7 of the Better Cotton Assessment Process document for more detail.

7 Analysis and Reporting

The Analysis and Reporting step for a remote assessment follows the process outlined in section 3.8 of the Better Cotton Assessment Process document.

- 7.1 Key deliverables of this step are the Assessment Report and Corrective Action Plan (where required). These are to be shared with the Farm Manager and Better Cotton within 3 weeks of the assessment.
- 7.2 The assessor is to complete a risk assessment for each Large Farm 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 documents (where relevant):**

- *Farm Training Plan*
- *Sample of Training Materials per indicator (photographs acceptable)*
- *Sample of local language dissemination material (photographs acceptable)*

➤ **Management and Phase-out Plans:**

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

- *Management plan*
- *Continuous Improvement Plan*
- *Integrated Pest Management Plan*
- *Phase-out Plan for Pesticides defined as carcinogenic, mutagenic, or reprotoxic (CMR) substances according to GHS Ia and Ib*

➤ **Management Plan Supporting Documents:**

- *Records on pesticide use, including natural substances (if applicable)*
- *List of Pesticides Nationally Registered for use on Cotton*
- *Soil testing results*
- *Climate Impact assessment*
- *Documented evidence for measuring state of natural habitats and biodiversity*
- *Documentation of any degraded areas (if applicable)*

➤ **Other required documents:**

- *Child Labour Policy (if using)*
- *Farm labour force profile for the current season*
- *Sample of wage slips and/or payment records (if available)*
- *Documentation of labour monitoring and remediation activities (as applicable)*
- *Written agreement with workers (if applicable)*
- *Records of grievances and how they were addressed (from 25-26 season)*

Ib. Data Management and Training / Adoption Records (where relevant)

- *Training participation records*
- *Results Indicator data sample*