ELEVATE

Social Responsibility Assessment (SRA) Tool Assurance Guidance

April 2022, Version 1.1



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1 Background & Introduction to the SRA

The Social Responsibility Assessment (SRA) Tool for the seafood sector is a human rights due diligence tool that provides a framework to assess social risks at the vessel, farm, or processing facility-level.

The SRA covers three main principles:



The SRA translates concepts from existing international standards and certification and rating practices into a framework that evaluates risk. The SRA is not a certification or standard, but a risk assessment. As an open access framework, the SRA can be used in several ways. It is important to understand the scope of the assessment in order to ensure the process and results are credible and accurate.

2 Purpose

The SRA is designed to be flexible in use. This means the tool can be used to build programs that are wellpositioned to achieve a user's unique intended outcomes. Given this flexibility, the assurance system is also based on a user's needs. This guidance serves to provide recommendations and best practices to assessors for conducting the SRA to ensure consistent and credible implementation.

This document provides guidance on the following:

- + An overview of the SRA process
- + Detailed guidance on the preparation and assessment steps
- + Qualifications of the assessor/assessment team

This document includes a range of potential assurance practices, along with examples, so that each stakeholder can make an informed decision on the best approach for their unique needs. To help distinguish recommended best practices, you will find best practices in **ORANGE** boxes throughout the document.

3 The SRA Process

There are three main steps in the full SRA process:



This guidance document focuses on the Prepare and Assess steps in the SRA process. More information about how to plan for improvements based on SRA results can be found on the <u>RISE website</u>.

3.1 Step 1: Prepare

The preparation step in the SRA process includes scoping and coordination, sampling, scheduling, and assessor preparation. All aspects of preparation should occur well in advance of the desired assessment date.

3.1.1 Scoping & Coordination

Determining the Unit of Assessment (UoA) is a key step to planning the assessment. The UoA defines the sites and individuals that will be included in the scope of the assessment. See the <u>SRA Unit of Assessment Guidance</u> for more information on determining the UoA scope.

Once assessment dates have been chosen, the assessor should plan to provide the UoA with a basic overview of when, where, and how the assessment will occur. An important part of this includes providing the UoA with a list of documents that may be reviewed during an assessment. This allows the UoA to organize information in advance, streamlining the off-site and on-site portion of the assessment. Some documents may be more difficult to obtain than others, especially if they need to be acquired from a third party. This should be taken into consideration during scoping and coordination to ensure all necessary documents have been gathered by the time of the assessment.

Within the <u>SRA Tool Assessment Template</u>, the 'Assessment Information' tab details information that assessors should collect prior to the assessment. For example, for wild-capture fisheries, this includes but is not limited to: total number of vessels, total number of fishers, and the locations where fishers are landing their seafood and/or docking their vessels. For aquaculture and processing, this includes but is not limited to: the location of any sites managed together and the number of workers/farmers at each site. These numbers are important to determine sampling, and the locations are necessary to determine assessment duration and logistics.

Best Practice

Depending on the scale, complexity, and location of the Unit of Assessment(s), the person collecting this information may be the auditor or another individual collecting coordination information. In countries where auditor integrity is a higher risk, and/or where integrity mitigation measures do not exist (such as APSCA accreditation), it is considered best practice for auditors to not be the one collecting this information directly and engage with the site only at the time of the assessment.

3.1.2 Sampling

While assessing every single vessel, worker, landing site, or farm may produce the most precise results, when done properly, assessing a sample can lead to highly accurate results at a fraction of the time and resources. This section provides guidance on how to calculate sample size and make-up, and how to estimate the number of days an assessment requires.

The on-site portion of the SRA is when primary data collection and site inspections takes place. Primary data collection comes from interviews and surveys with workers/fishers/farmers and management. In addition to interviews and surveys, the on-site portion of the assessment includes site observations, another source of primary data. Sites include vessels, landing sites, processing sites, and aquaculture farms that have been included in the scope of the UoA. To determine the number of individuals to interview and sites for observation, a representative sampling methodology should be used. A representative sample is comprised of a subset of a population that allows statistical inferences to be made about the entire population.

Several methods can be used to determine a representative sample, depending on the type of information being gathered and familiarity with the target population. The guidance in this section helps assessors ensure a representative sample for the SRA.

Best Practice

Sampling methods other than those described in this document may be used, however, to ensure accurate results, only peer-reviewed approaches should be applied. The final assessment report should clearly identify which sampling method was used and the rationale for its use, along with the final number of interviews and sites sampled. This information is critical to ensure that future assessments reflect changes over time rather than changes in sample size and make-up.

3.1.2.1 Site Sampling

Site sample size and composition should be determined according to site type. The types of sites that may be included in an assessment are vessels, landing sites, processing facilities, or aquaculture farm sites.

A sampling approach is not recommended for processing facility sites, and it is best practice to visit any that are included in the scope of the Unit of Assessment. If there are several processing sites, it is recommended to perform a separate SRA at each, in particular, for those under separate management.

When it comes to landing sites and aquaculture farms, in some cases, there may be several included in the scope of an assessment, many of which may be geographically remote or distant from one another. As such, in the scope of a single assessment, it is possible to sample the number of landing sites or aquaculture farms that need to be inspected. However, a recommended goal is to ensure that at least each site has been visited once every three years.

Table 1: Method to determine number of sites visited during an assessment.

Number of sites	Site inspection sample size
3 or less	All
Greater than 3	site sample =√# sites and a minimum of 3

Best Practice

Even when a sampling methodology is used, it is best practice to ensure each site is visited at least once in any three-year period (in particular when doing annual assessments). Furthermore, the methodology described in Table 1 is to be considered a minimum. The sample of sites visited may be increased if the assessor feels it is appropriate, and should be increased where time and money permit.

Example A

There are 15 landing sites at which fishers within scope of the assessment land their catch, and one processing facility.

A sample of the landing sites can be taken: $\sqrt{15} = 3.87$, rounded up to 4. Therefore, at a minimum, 4 landing sites must be visited during the assessment. The processing site is left out of the equation above and should be visited independent of the landing site sample.

Altogether, 5 sites will be visited: 4 landing sites and 1 processing site.

3.1.2.2 Individual Sampling

It is important to fully understand the scope of the UoA in order to ensure the sample is representative. An unrepresentative sample may lead to inaccurate results and false conclusions. If both production and processing operations occur within the UoA, a sample should be determined for each of these groups separately. Additionally, where there is no crossover/mixing between individuals working at multiple sites (e.g., vessels that visit multiple landings sites), the sample should be calculated separately for each site. See section 3.1.2.5 for more information.

There are many acceptable methods to calculate a representative sample, and many organizations in the social auditing space define their own required practices. Some examples of acceptable sampling methodologies are as follows:

- + Social Accountability International: Audit Requirements for Accredited Certification bodies for the SA8000 *Program* (link), Version 4.2, Table 9
- + Fairtrade International: Requirements for Assurance Providers (link), Version 2.0, Table C1
- + Sedex: Sedex Members Ethical Trade Audit (SMETA) Best Practice Guidance (<u>link</u>), Version 6.1, Section 6.5.3.1
- + Aquaculture Stewardship Council (ASC): ASC Site Sample Calculator (link), v1.0

A simple and widely accepted approach to determine the sample size of interviews at each site is defined in <u>Table 2</u> below.

Table 2: Method to determine interview sample size.

Total number of employees:	1-99	100-999	1,000-4,999	5000+
Recommended sample size	5	15	25	40

Best Practice

It is recommended to view the numbers of any rigid sampling method as a minimum. Where time permits and/or more information is needed to adequately evaluate the SRA, the assessor should adapt and conduct additional interviews.

Example B

Landing site 1 has 180 fishers, landing site 2 has 35 fishers, and landing site 3 has 1,200 fishers.

Landing site 1: A minimum of $\underline{15}$ fishers should be interviewed. Landing site 2: A minimum of $\underline{5}$ fishers should be interviewed. Landing site 3: A minimum of $\underline{25}$ fishers should be interviewed.

Group vs. Individual Interviews

During an assessment, there must be individual interviews with workers/fishers/farmers, however group interviews may be appropriate as well. Group interviews may be used where an assessor believes that information can be better obtained from a group discussion, as it may allow for a more natural conversation. It is recommended that individuals are interviewed in groups of three, and no more than six. The number of individuals who are interviewed in groups should not exceed 50% of the total sample.

Example C

If the calculated sample size is 18 individuals, it is best practice to conduct no less than 9 individual interviews and no more than 3 group interviews of 3 individuals each.

Individual sample composition

Once the sample size is determined, the assessor should define the make-up of the sample, in order to ensure that composition of the sample reflects the composition of the overall population. For example, the assessor should, at a minimum, aim to stratify the interviewees according to worker/fisher/farmer classifications and job descriptions (see below "Key Informant Interviews" for additional guidance). It is also recommended to take other factors into consideration, such as demographic and workforce characteristics like gender, nationality, age, ethnicity, permanent vs. seasonal, etc. It is best practice to conduct at least two interviews per minority group in order to gain a representative sample. Where possible and applicable, assessors are encouraged to increase the sample size to ensure minority groups are represented.

3.1.2.3 Vessel Sampling (where applicable)

For wild-capture fisheries with vessels, only a sample of vessels need be inspected to be considered representative of the fleet. Regardless of vessel size, a recommended sampling methodology is to use the square root of the total number of vessels, rounded up to the nearest integer (<u>Table 3</u>).

It is recommended to conduct as many vessel inspections as time permits. However, for larger fleets, a statistically representative sample can follow the normal distribution sample size, which means at least 30 vessels should be inspected (<u>Table 3</u>Table 3). Additionally, where there is no crossover/mixing between

individuals working at multiple sites (e.g., vessels that visit multiple landings sites), the sample should be calculated separately for each site. See section 3.1.2.5 for more information.

Table 3: Method to determine vessel sample size.

Number of vessels	Vessel inspection sample size	
Greater than 1 and under 865	vessel sample = $\sqrt{#}$ vessels,	
Greater than I and under 805	rounded up	
865 or more vessels	A minimum of 30 vessels	

Example D

Landing site 1 has 120 vessels, landing site 2 has 30 vessels, and landing site 3 has 1,000 vessels.

Landing site 1: $\sqrt{120} = 11$, therefore a minimum of 11 vessels should be inspected. Landing site 2: $\sqrt{30} = 6$, therefore a minimum of 6 vessels should be inspected. Landing site 3: $\sqrt{1000} = 32$. Because 32 is greater than 30, a sample of 30 vessel inspections would be adequate for landing site 3.

3.1.2.4 Document Sampling

Many of the SRA indicators are centered around the employer-employee relationship, and evidence of certain elements, such as employee contracts and working hours, comes from employee files and time records. An employee could be a worker, fisher, or farmer, and is generally defined as someone who has entered into a formal employment relationship with a company or captain/skipper and is being paid for their work. A representative sample of files and records is adequate to implement the SRA.

+ <u>Sample of employee files</u>: Employee files include items such as contracts/agreements and records that contain information about the employee, such as age verification, among others. The sample of employee files that are reviewed should be equivalent to the number of interviews conducted (<u>Table 4</u>).

Table 4: Method to determine employee file sample size.

Total number of employees:	1-99	100-999	1,000-4,999	5000+
Recommended sample size	5	15	25	40

+ <u>Sample of time records: Table 5</u> defines minimum sample sizes for employee time records. This includes any system that tracks the hours an employee has worked.

Table 5: Method to determine time record sample size.

Total number of employees:	1-99	100-999	1,000-4,999	5000+
Recommended sample size	15	25	35	50

At least 50% of the files and records reviewed should be from the employees interviewed to verify interview findings.

Best Practice

The sample size of time records shown in Table 4 should be the minimum sampled for the initial assessment. In follow-up assessments where there is medium to low risk from the previous assessment, sample sizes can be reduced to 15 records where there are 1-4,999 employees, and at least 25 where there are 5,000+ employees. If there were high-risk indicators found in the previous assessment, it is recommended to maintain sample sizes in Table 4.

Guidance for Individual Operators and Small-scale Operations

Note that for individual operators and/or fishers organized in a cooperative, there may not be an employeremployee relationship, however this does not mean there is no documentation to be reviewed. While formalized contracts and time records may not be used, there is often other relevant documentation that can give similar insights. For example, there may be receipts, records of debt a fisher may have with a cooperative, and/or pay slips offered to crew that show earnings from a trip. Where possible, it is recommended to follow the sampling for employee records listed above in (<u>Table 4</u> and <u>Table 5</u>), but instead of basing it off the number of employees, it should be based on the number of available documents. Additionally, as the documentation in these situations may vary greatly, it is recommended to review additional documentation as time permits.

Example E

If there are 200 fishers, and only about 50 of them have loan documents, the minimum sample size should be 15 loan documents.

3.1.2.5 Sampling for Units of Assessment with Crossover Between Sites

In some cases, there will be Units of Assessment where a select number of vessels visit multiple landings sites within scope of the assessment. In this case, a sample of the sites can still be used, however it is recommended to distribute the number of interviews and vessels evenly across sites.

The following steps can be taken to determine the sample in this case:

Step 1: Find the sample of sites.

Step 2: Divide the number of vessels, individuals, and documents by the number of sites. Step 3: Use the number of individuals, documents, and vessels *per site* to determine sample size of interviews and vessel inspections to take place at each site.

Example E

Suppose the Unit of Assessment has 18 landing sites, 115 vessels, and 2,000 fishers.

Step 1: $\sqrt{18} = 4.24$, rounded up to 5 sites. Step 2: Vessels per site = 115 / 5 = 23; fishers and documents per site = 2,000 / 5 = 400 Step 3: Sample of vessels per site = $\sqrt{23} = 4.79$, rounded up to 5 vessels; sample of interviews and documents = 15 (as per <u>Table 3</u>).

Therefore, at each landing site, in the sample (5), 5 vessels shall be inspected, 15 interviews should take place, and the documents of 15 employees should be reviewed.

3.1.3 Scheduling

Timing

The assessment should take place during peak activity of the Unit of Assessment. This will allow the assessor to observe the full scope of activities to adequately capture occupational health and safety risks. It also allows seasonal, temporary, and/or migrant workers/fishers/farmers that are on-site for a limited amount of time to be included in the assessment.

Time Allocation

The amount of time needed to conduct an SRA will vary depending on the number of sites and workers/fishers/farmers included in scope, the geographic spread of the UoA, and the scope of SRA requirements being assessed.

The following steps help determine the number of estimated assessment days based on the scope of the UoA and the geographic spread.

Step 1: Determine amount of time needed to conduct interviews.

Once the total interview sample size at each site has been calculated, use the following table to determine the amount of time needed to conduct interviews at each site.

Table 6: Determining time needed to conduct interviews during the assessment based on the sample of interviews.

Interview Sample	Number of Days	
1-5	0.5	
6-15	1.0	
16-25	1.5	
26-40	2.0	
>40	2.5	

Sum the number of assessment days *per site* to calculate the total minimum number of assessment days.

Example F

Consider the details in Example B. Using the sample methodology from Table 1, landing site 1 would require 1.0 days (15 fisher interviews), landing site 2 would require 0.5 day (5 fisher interviews), and landing site 3 would require 1.5 days (25 fisher interviews). A minimum of 3.0 days should be allocated to conduct interviews at all three sites.

Step 2: Determine amount of time needed for vessel inspections (applicable only for UoAs with vessels).

Once the vessel sample size at each site has been calculated, use the following table to determine the amount of time needed for vessel inspections at each site.

Table 7: Determining time needed to conduct interviews during the assessment based on sample of vessels to be inspected.

Vessel Sample	Number of Days
1 - 10	1.0
11 - 20	1.5
21 - 30	2.0

Sum the number of assessment of days *per site* to calculate the total minimum number of assessment days.

Example G

Consider the details in Example D. Using the sample methodology from Table 2, landing site 1 would require 1.5 days (11 vessels inspected), landing site 2 would require 1.0 day (6 vessels inspected), and landing site 3 would require 2.0 days (30 vessels inspected). A minimum of 4.5 days should be allocated to conduct for vessel inspections at all three sites.

Step 3: Determine amount of time needed based on the number of sites.

Independent of the sample sizes, the assessor will need to visit each site, therefore additional days should be allocated for general site inspection, whether a landing site, processing site, or aquaculture site.

Table 8: Determining the time needed for site observation based on the number of sites.

Number of Sites	Number of Days
2-5	1.0
6-10	1.5
>10	2.0

Example H

Consider the details in <u>Example B</u> and <u>Example D</u>. There are 3 sites in this example, so an extra day (1.0 day) should be added to the assessment schedule.

Step 4: Determine amount of time needed for travel.

If there are multiple sites, the assessor will need to travel between sites, therefore additional days should be allocated for travel time.

Table 9: Determining the amount of time needed to travel between sites during an assessment based on total travel time.

Travel time between sites	Number of Days
< 4 hours	0.5
4-8 hours	1.0
9-16 hours	1.5
17-24 hours	2.0

Example I

Consider the details in <u>Example B</u> and <u>Example D</u>. In this example, it takes a total of 8 hours to travel between all 3 sites, therefore 1.5 days should be added to the assessment schedule.

Step 5: Add the total number of days from Steps 1-4 to determine the final estimated assessment duration.

In addition to the number of days allocated for the on-site portion of the assessment, an extra half day should be allocated for desk research before the on-site portion of the assessment, and one day should be allocated at the end of the on-site portion of the assessment for final report writing. The recommended formula for calculating the total assessment duration is therefore:

Total minimum assessment days

- = (sum of interview days at each site)
 - + (sum of vessel inspection days at each site)
 - + (number of days according to number of sites)
 - + (number of days according to travel time between sites)
 - + (1.0 days for desk research and document review)
 - + (1.0 day for report writing)

Note: Time needed to conduct desk research can be variable. It is recommended to alter this estimate as appropriate depending on the circumstances.

Best Practice

It is best practice to plan time for any follow-up interviews as necessary where more clarity and information may be needed to adequately assess a particular indicator.

Other factors to consider when determining assessment duration include, but are not limited to:

- + This is an estimate to implement the <u>entire</u> SRA. Depending on the scope of the assessment it may take less or more time; however, this approach is recommended regardless of the scope of indicators being assessed.
- + The desk-based research and document review portion of the assessment can vary greatly depending on the accessibility of information. For document review to be most efficient, documents that are to be reviewed during the assessment should be collected during the coordination process.
- + The timeline of the assessment may vary depending on the size of an assessment team. Depending on the division of roles on the assessment team, an SRA could be completed more quickly, however it is recommended to estimate time allocation according to the above framework.

Variable	Landing Site 1	Landing Site 2	Landing Site 3	Total All Sites
Number of days based on no. interviews	1.0	0.5	1.5	3.0
Number of days based on no. vessels inspections	1.5	1.0	2.0	4.5
Number of days based on no. of sites	-	-	-	1.0
Number of days based on travel time between sites	-	-	-	1.5
Number of days for desk research and report writing	-	-	-	2.0
		Total estimate for	entire assessment:	13.5 days

Table 10: Adding the number of days determined in Example E through H to calculate the recommended minimum number of days for the information provided in Example B and Example D.

3.1.4 Assessor Preparation

In addition to the qualifications defined in <u>Section 4</u> of this document, an assessor should review available SRA documentation in advance of the assessment. These resources can be found on the <u>RISE website</u>.



An assessor should be prepared to:

- Know, communicate, and follow the Code of Conduct for the Assessment Team defined in the <u>SRA Guide</u> to <u>Data Collection</u> on page 2. The Code of Conduct states the expectations of all parties involved in the assessment, including assessors, the UoA, and workers/fishers/farmers.
- + Understand how to read the SRA (see <u>Annex A</u>).
- Identify which requirements are applicable to the UoA depending on the Decision Tree in the SRA (this can be found on page 7 of the <u>SRA</u>). Depending on certain characteristics of the UoA, there are specific indicators that may not apply.
- + Conduct data collection as described in the <u>SRA Guide to Data Collection</u>.
- + Utilize best practices for conducting interviews, such as maintaining fluid conversations and avoiding reading a checklist of questions to assess the SRA indicators (See <u>Annex B</u>).
- Apply a worker/fisher/farmer-driven approach during the assessment, details of which can be found in the <u>SRA Manual for Trainers</u>.
- + Verify findings via triangulation, details for which can be found in the <u>SRA Manual for Trainers</u> and the <u>SRA training modules</u>.

This is by no means an exhaustive list, but minimum requirements to implement the SRA effectively. There are myriad resources on the RISE webpage to broaden an assessor/assessment team's knowledge.

Best Practice

Assessors/assessment team members should be very comfortable with the <u>SRA Guide to Data Collection</u> before conducting an assessment and should have it available during the assessment for continuous review.

3.2 Step 2: Assess

This section provides guidance on how to conduct an SRA. There are three main phases to an assessment:



Best Practice

An assessment should take place at least annually to ensure the most up-to-date information, and to measure improvements implemented in response to a previous assessment. If an assessment turns up several high-risk indicators, it may be beneficial to conduct more than one assessment each year to intervene and re-assess on a more frequent basis.

3.2.1 Phase I: Off-site Data Collection

During this phase of the assessment, there are two main elements: completing the UoA profile and desk research.

UoA Profile

A full UoA profile should be created before an assessor/assessment team is on-site, the details of which can be verified during the assessment. Much of this information will be collected during the preparation step, including, for example, the total number of individuals and number and location of sites. Assessors should verify they have all relevant UoA information before arriving on-site, including information about species, production method (gear or farm type), demographics of the individuals in scope, migrant status, and labor agency information, among others. If using the , this profile is developed by using the 'Assessment Information' tab.

Desk Research

During desk research an assessor utilizes open access resources to help assess the risk indicators in the SRA. This mode of research is not relevant for all SRA indicators. The <u>SRA Guide to Data Collection</u> highlights the SRA indicators where desk research is appropriate and provides examples of open access resources where an assessor can find information they need. This portion of the review should take place before an assessor is onsite.

3.2.2 Phase II: On-site Data Collection

Once the assessment is scheduled, the assessor/assessment team will go on-site to collect primary data for the SRA. There are several recommended elements to include in the on-site portion of the assessment.

Opening Meeting

On the first day of the assessment, the assessor/assessment team should meet with management and any fisher or worker representative(s), where present. This meeting is important to establish clear roles and responsibilities, and right-size the expectations of the UoA management about the assessment.

During the opening meeting, the assessor/assessment team will:

- + Introduce themselves and walk through the assessment schedule, reconfirming logistics (such as transportation between sites and which sites will be visited on which days)
- + Reiterate the goal of the SRA and the general topic areas it covers
- + Ask management if there are any safety issues the team should be aware of, and request Personal Protective Equipment (PPE) as appropriate
- + Explain the Code of Conduct of the Assessment team to management
- + Explain how interviewees' identities will be protected from retaliation for participating
- + Establish appropriate communication channels for all parties during the assessment

There should always be some form of fisher and/or worker representation present at the opening meeting. If a formal union/workers' organization is active in the UoA, they should always be included in this meeting and kept informed of the assessment process, with specifics on how and when workers will be interviewed.

Best Practice

Where there is no formal union/workers' organization active in the UoA, it is best practice to establish a worker/fisher/farmer committee. The committee's role would be to communicate with other workers/fishers/farmers in the UoA, with the purpose of increasing trust and transparency in the SRA process. Representatives from this committee would then attend SRA opening and closing meetings.

Document Review

If an assessor is not granted full access to the documentation needed to demonstrate evidence for a specific indicator, the risk level for that indicator defaults to high risk.

Document review is necessary for any indicator that includes a policy on a particular issues area. It is also necessary for certain PISGs, in particular those on contract substitution, underpayment of wages, and unfair disciplinary procedures, whereby payroll and contracts should be reviewed. Review the <u>SRA Guide for Data</u> <u>Collection</u> for examples of documents that should be reviewed for each indicator.

Note that relevant documentation should be determined according to the Decision Tree described in the SRA, which indicates which indicators are applicable in which types of UoAs. For example, a cooperative of individual operators (small-scale operation) may not have written employee contracts, but it is important to verify any debt the fisher may hold with a cooperative via loan records and/or receipts.

Site Inspection

Direct observation of sites, including vessels, aquaculture farms, and/or processing sites, is necessary to assess safety conditions of workers/fishers/farmers.

Direct observation of sites is a required data input for the following indicators:

- + 1.1.1: Abuse and harassment
- + 1.1.7a: Access to basic services for worker/fisher/farmer housing/live-aboard vessels
- + 1.1.7b: Access to basic services for small-scale fishing communities
- + 1.1.8: Occupational safety
- + 1.1.9: Medical response

The <u>SRA Guide for Data Collection</u> provides guidance on direct observation to obtain the evidence needed for the indicators listed above. Although these specific indicators have direct guidance on observation, observation may occur throughout the assessment in relation to all indicators of the SRA.

Best Practice

Verification of evidence through data collection from multiple sources, also known as triangulation, is a preferred technique for data collection. Direct observations during the site inspection should be verified via other sources, including interviews and document review.

If for any reason an assessor is denied access to sites where direct observation is necessary to obtain evidence, that indicator is automatically deemed high risk.

Key Informant Interviews

Key informant interviews are critical to verifying information collected via desk research, document review, and on-site inspections. They typically occur during the on-site inspection.

Key informant interviews are a required data input for all indicators. The recommended key informant interviewees include, but are not limited to:

- + Workers/fisher/farmers
- + Fish farm/facility managers
- + Human resources manager/personnel clerk
- Persons-in-charge of recruitment, wages, accounting, payroll
- + Farm/facility supervisors/group leaders
- + Staff managing contractors

- + Staff handling worker/fisher/farmer welfare, food, accommodations
- + Health and safety officer
- + Nurse/clinic staff
- + Gender committee, grievance committee, other committee management representatives



- + Union officers
- + Labor suppliers and contractors
- + Labor agency representatives (receiving country)
- + Cooperative store managers
- + Boat captain/skipper
- + Engineers and crew, cooks
- + Vessel operations manager

Best Practice

It is best practice for interviews to take place following the site inspection. This can help to complement observations made during the inspection.

There are two main forms of interviews:

- 1) Focused, one-on-one interviews
- 2) Group interviews

See Section 3.1.2.1 above for more information on best practices for how to incorporate either or both of these interview types into an interview plan.

Closing Meeting

Once all forms of evidence have been collected and any follow-ups have been completed, the assessor/assessment team should hold a closing meeting with management and any worker/fisher/farmer representation. The following should be covered, at a minimum, in the closing meeting:

- + Discuss any findings related to the law with management.
- + Provide a draft list of findings and, at a minimum, the estimated risk-level for each Principle.
- + Discuss any high-level recommended improvements that can be addressed.
- + Emphasize any positive feedback of observed best practices.
- + Explain when and how management will receive the final report.

3.2.3 Phase III: Report Writing & Submission

During the assessment, the assessor(s) should work on elements of the report each day following interviews and on-site inspections while findings are fresh in their mind. Following the assessment, the final report should be refined, looking for any typos or required spaces left blank. The assessor(s) should ensure that all applicable indicators have a finding and that any findings have been explained clearly.

Best Practice

It is best practice to submit the final report to the UoA within 7 days of the assessment.

Scoring the SRA

In the final report, the final scoring should be tallied up. The assessment results culminate in a final score that determines the level of risk for each Indicator.

The PISGs are broken out into different risk-level categories – high, medium, and low risk, according to the breakdown in *Figure 1*. All PISGs in the medium risk category must be met to score as medium, and all PISGs in medium and low risk categories must be met to score low risk. If any PISG in the medium risk category is not met, that component is deemed high risk. Note that there are some PISGs that are 'OR' statements, which means that level will be achieved if any of those are met.

Scores can be aggregated to the Principle level by assigning a score of 1, 2, or 3 for resultant high, medium, or low risk indicators, respectively. The total number of points that can be earned for a Principle is the number of

Indicators in that Principle multiplied by 3. However the UoA scored against that total will determine the percentage, and ultimately the risk level, associated with that Principle. <u>Table 11</u> describes how determine a resultant risk level at the Principle level according to the score.

Additionally, in the medium risk section of each indicator, there is a PISG that states the following: "There are reliable and transparent data available, or the assessment team is able to collect primary data through observation, surveys, and interviews in a manner safe for the assessment team and affected workers/fishers".

If an assessor is not granted access to documents or sites to collect evidence for an assessment, and/or the safety of the assessor or interviewees is compromised, the UoA will automatically be scored as high-risk for the relevant indicators.

Figure 1: How to determine risk level for each SRA Indicator.

Indicator 1.1.2.b: Debt bondage in small-scale fisheries

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	SRA1.1.2.b SO	There are no reliable or transparent data available, or the assessment team is not able to collect primary data through observation, surveys, or interviews in a manner safe for assessment team or affected workers/fishers,					
RED: HIGH RISK (<60)	SRA1.1.2.b SO	OR - The fisher/farmer is paying off debt to the cooperative, association, buyer, or permit holder (for equipment, permit fees fuel costs, ice, etc.), and all or most of their income (or share of catch) is used to pay back their debts,	An 'OR' statement here means that if there is evidence of any of				
	SRA1.1.2.b SO	OR - The fisher/farmer is paying off debt to the cooperative, association, buyer, or permit holder (for equipment, permit fees fuel costs, ice, etc.), and their debt has increased over time proportional to their income (or share of catch),	these PISGs, the UoA scores HIGH RISK				
	SRA1.1.2.b SO	OR - The fisher/farmer is not allowed to witness the product being weighed or graded to calculate their income (or share of catch),					
	SRA1.1.2.b SO	OR - If applicable, interest rates charged to fishers/farmers are not transparent or are exorbitant/predatory.					
YELLOW: MEDIUM RISK (60-79)	SRA1.1.2.b S1	There are reliable and transparent data available, or the assessment team is able to collect primary data through observation, surveys, and interviews in a manner safe for the assessment team and affected workers/fishers,	If any of these PISGs is not met, the UoA scores				
	SRA1.1.2.b S2	AND - The fisher/farmer is paying off debt to the cooperative, association, buyer, or permit holder (for equipment, permit fees, fuel costs, ice, etc.), but most of their income (or share of catch) is kept and a smaller percentage is used to pay back their debts,	HIGH RISK Each of these				
	SRA1.1.2.b S3	AND - The fisher/farmer is paying off debt to the cooperative, association, buyer, or permit holder (for equipment, permit fees, fuel costs, ice, etc.), and their debt has remained stable or decreased over time proportional to their income (or share of catch),	PISGs must be met to score MEDIUM RISK				
YEL	SRA1.1.2.b S4	AND - The fisher/farmer is allowed to witness the product being weighed or graded to calculate their income (or share of catch),	Each of these PISGs must be met to score				
	SRA1.1.2.b S5	AND - If applicable, interest rates charged to fishers/farmers are transparent and agreed upon in advance with fishers/farmers.	LOW RISK				
: LOW RISK (80+)	SRA1.1.2.b S6	The fisher/farmer is paying off debt to the cooperative, association, buyer, or permit holder (for equipment, permit fees, fuel costs, ice, etc.), but a minimal percentage of their income is used to pay back their debts, and their debt has decreased over time proportional to their income (or share of catch),					
GREEN: LOW	SRA1.1.2.b S6	OR - The fisher/farmer is NOT paying off debt to the cooperative, association, buyer, or permit holder.					
	The 'OR' statement here indicates that either of these can be met to score in the low risk category, but note that all of the medium risk PISGs must still be met in order to						

score low risk.

Table 11: How to determine risk-level according to final score.

<60	HIGH RISK	Red
60-79	MEDIUM RISK	Yellow
80+	LOW RISK	Green

4 Qualifications for Assessors

It is important for assessors/assessment teams to hold the requisite expertise needed to effectively complete the SRA. Working with an unqualified individual or team risks producing inaccurate, biased, or irrelevant findings.

4.1 Qualifications

The following section provides guidance and best practices on assessor/assessment team qualifications.

In addition to understanding the SRA, a qualified assessor/assessment team should have experience and/or training in the following areas:

- A. Social sciences
 - + Conducting interviews with workers/fishers/farmers and management, particularly on sensitive subjects, such as those relating to forced labor or discrimination
 - + Conducting document review
 - + Understanding human rights and labor rights standards
 - + Understanding international, national, and local labor laws
 - + Understanding root causes and connections among different SRA risk indicators
 - + Recognizing and screening for indicators of human trafficking, forced labor, child labor, and other forms of human rights abuses
- B. Fisheries/aquaculture
- C. Language proficiency: Communicating effectively with interviewees, either by speaking the same language or experience working with an interpreter

These qualifications can be met by a single individual or a team of individuals. Fisher/worker/farmer trade or labor unions, and worker rights organizations, or social auditors, are the preferred parties to lead the assessment. The below sections provide guidance on social auditing experience and other backgrounds to evaluate qualifications.

4.1.1 Social Sciences Knowledge

Seafood-Specific Social Auditing Experience

For the most robust, credible assessments, assessors should have demonstrated experience in the social auditing space. An easy way to find assessors of this caliber is to look for accredited auditors. Accredited auditors are required by many certifications to conduct audits against their requirements. These accreditations mean the individual has completed training specific to social auditing, including how to conduct interviews on sensitive human rights issues and on-site safety inspections.

There are multiple organizations that recognize, approve, or accredit social auditors:

- + Association of Professional Social Compliance Auditors (APSCA) Member in good standing
- + Social auditor of a Conformity Assessment Body accredited by ISO 17065
- + Assurance Services International (ASI)

There are also many seafood standards and certifications in the social auditing space, and auditors approved to conduct social audits against these programs will be qualified in the methods necessary to implement the SRA. Some examples include auditors approved to audit against:

+ AENOR Atun de Pesca Responsable + Fair Trade USA Capture Fisheries Standard



- + Responsible Fishing Vessel Standard
- + Seafood Task Force Vessel Auditable Standard

- + Thai Union Vessel Code of Conduct
- + Aquaculture Stewardship Council
- + Best Aquaculture Practices (BAP)

Note that many of the standard holders listed above only approve auditors that are accredited by ISO 17065 or ASI.

Best Practice

It is highly recommended that the UoA has an accredited third-party undertake the SRA, whether a member of APSCA, or an accredited CAB by ISO 17065 or ASI, to conduct an assessment. At least one of the assessors on the assessment team should be qualified for social auditing practices as described above.

While using an accredited social auditor is the preferred option to meet the minimum social science qualifications, there are other qualified individuals that can conduct assessments. At a minimum, the assessor/assessment team should have experience in the social science space.

Adequate knowledge in the social science space can be demonstrated by the following:

- + University degree in a relevant social science field
- Social auditing is also developed in other industries where auditors have vast experience with social standards. An assessor with formal or informal experience implementing other social programs may be qualified to conduct the SRA. Note that an individual qualified in social standards and certifications in other industries will still need to demonstrate experience in fisheries/aquaculture to conduct the SRA. Other relevant social auditing programs that demonstrate relevant social sciences experience include, but are not limited to:
 - o Fairtrade International
 - Fair Trade USA (agriculture and factory programs)
 - Equitable Food Initiative
 - Ethical Trading Initiative

- Fair Wild Standard
- o GRASP
- o Rainforest Alliance
- o SMETA
- + Experience working to address social issues in fishing communities

Best Practice

It is highly recommended that an assessor with the qualifications listed above has completed one or more of the social auditing trainings, and all of the SRA-specific trainings in <u>Section 4.2.3</u> below, at a minimum.

4.1.2 Fisheries/Aquaculture Knowledge

In addition to understanding social issues, it is important for an assessor to understand the context in which the assessment will be undertaken. This means an assessor or assessment team should include individual(s) with experience working with fisheries or aquaculture. This can be demonstrated by the following:

- + University degree in fisheries, marine biology, marine conservation, marine or fisheries management, natural resources, among others.
- + Training, experience, approval, recognition, or accreditation to audit against a fisheries standard (e.g., the Marine Stewardship Council), and/or the social seafood-specific programs listed above (Section 4.1.1).
- + Experience implementing fisheries or aquaculture science or management, such as stock assessments, biological/ecological data collection and analysis, or implementation of fisheries management practices.
- + Experience with health and safety inspections on vessels or at aquaculture sites.

4.1.3 Language Proficiency

It is important that the assessment team is proficient in languages spoken in the UoA to conduct an effective assessment. When collecting information about the UoA, it is important to note the languages spoken by workers/fishers/farmers to ensure there is someone on the assessment team who can effectively communicate with them. A qualified assessor might themselves speak the language or may bring a qualified interpreter onto the assessment team. Language proficiency should be demonstrated prior to the assessment taking place.

4.2 Training to Meet Assessor Qualifications

An assessor/assessment team should be prepared for the assessment by taking relevant trainings. This section provides some trainings that can help an assessor become qualified to conduct the SRA. The trainings fall under the following categories:

- + General social auditing training
- + Fisheries and aquaculture training
- + SRA-specific training

4.2.1 General Social Auditing Training

Assessors that are members in good standing of APSCA or are an accredited Conformity Assessment Body by ISO 17065 or ASI will have completed rigorous trainings on social auditing practices. While APSCA membership and accreditation by ISO 17065 or ASI are preferred, these organizations, along with others, offer social auditing courses and training that can build an assessor's skills in the social auditing space without going through the formal accreditation processes. Examples of acceptable trainings that can be taken to build an assessor's qualifications include:

- + The International Standards Organization's trainings:
 - o ISO 45001: Occupational Health & Safety Certification
 - o ISO 26000: Social Responsibility Auditor
- + The International Labour Organization's training center (<u>link</u>), which include several relevant trainings, courses, and certifications that can help build an assessor's knowledge in areas such as the ILO conventions, occupational health and safety, and migrant labor, among others. Some are offered for free; others are fee-based.
- + Social Accountability International (SAI) Network's SA8000 trainings and online courses (link)
- + Verité's training courses (<u>link</u>) covering forced labor via e-learning (no cost) and ethical recruitment auditor training (fee-based)

Best Practice

If an assessor/assessment team is not an ASPCA member in good standing, nor an auditor of a CAB that is approved by ISO 17065 or ASI, it is highly recommended they provide evidence of completing at least one of the social auditing trainings listed above.

4.2.2 Fisheries & Aquaculture Training

There are many resources out there that can help an assessor build their fisheries and aquaculture knowledge to ensure evidence and findings are interpreted properly while on-site. Some are open access; others may be feebased. Examples of relevant fisheries and aquaculture trainings include the following:

- + The Environmental Defense Fund's Fishery Solution Center Toolkit and Virtual Academy (link)
- + The International Labour Organization's International Training Center course: Inspection of labor conditions on board fishing vessels (<u>link</u>)

- + The Food and Agriculture Organization of the United Nations' suite of training courses on fisheries and aquaculture, covering various topics (<u>link</u>)
- + The Marine Stewardship Council Online Training (link)
- + The International Maritime Organization's Introduction to IMO Conventions and Codes (link)
- + The Nature Conservancy's *conservationtraining* platform, which has relevant trainings on fisheries and aquaculture (<u>link</u>)

4.2.3 SRA-specific Training

All assessors need to be trained in the SRA itself to ensure a smooth assessment. There are several trainings and documents that serve to prepare an assessor for the SRA.

Table 12: SRA-specific training resources.	

Training	Training Type	Description
The Social Responsibility	Presentation	Before conducting an SRA, the assessor or lead
Assessment Tool for The Seafood	<u>slides</u>	assessor on an assessment team must have
Sector: A Manual for Trainers on		received this training.
Guidance for Assessment		
Implementation		
The Social Responsibility	Reference	This comprehensive guide walks through the data
Assessment Tool: Guide to Data		points needed for each indicator and where to find
Collection		them. It is essential for the assessor/assessment
		team to read this document in detail prior to an
		assessment.
Approaches to Gathering and	Online training	An assessor or each member of an assessment
Validating Data in Social	<u>modules</u>	team should complete this course before
Responsibility Assessments		conducting an assessment – a certificate of
		completion is available upon request.
SRA-specific training provided by	Live online training	Please reach out to
ELEVATE	upon request	SRAsupport@elevatelimited.com to request a
		training.

4.3 Internal vs. Third-Party Assessment

The SRA is designed to be flexible to allow for different purposes and use cases. For example, the SRA can be used as an internal risk management tool, or it can be implemented by a third-party to meet buyer requirements. In this section, guidance is provided for both situations. These can be summarized as a either an internal assessment or a third-party assessment.

Internal Assessment

An internal assessment program may be conducted by staff that are directly part of the Unit of Assessment (UoA), however the assessment system and teams should be kept separate from general operations. Note that a third-party FIP implementer is not considered an internal assessment.

Third-party Assessment

A third-party assessment is conducted by any entity outside of the UoA, which may include, but is not limited to, a third-party assessment firm, a non-governmental organization/non-profit, an academic institution, or a government official.

<u>Table 13</u> below provides guidance on how to decide whether to develop an internal assessment program or to have a third-party conduct the assessment.

Best Practice

Regardless of whether the assessment is internal or one conducted by a third-party, the top priority is the protection of individuals participating in an assessment. Names and personal details should never be shared with management, workers' organization or unions present on-site should be included in the assessment process, and workers should understand their rights.

For internal assessment programs in particular, it is best practice to have the assessment program operating completely separate from regular business functions.

Table 13: Benefits and challenges associated with conducting the SRA internally vs. through a third-party

Type of Assessment		Benefits		Challenges
Internal Assessment	+	May be more cost effective	+	Credibility and consistency
	+	Coordination and planning may be more efficient	+	Inherent bias due to a vested interest in assessment outcomes
	+	First-hand experience with on-site operations, which can be beneficial when outlining an improvement plan and building direct relationships with workers/fishers/farmers	+	Interviewees may not wish to share information with staff associated with management, leading to inaccurate assessment results Lack of auditing experience (this may
	+	Can serve as a pre-assessment to build knowledge of gaps prior to engaging with a third party		not always be the case)
Third-party	+	More likely to be accepted by external	+	Higher costs (including travel and out
Assessment		parties as a credible risk assessment		of pocket expenses)
	+	A third-party specializing in social assessments may have more experience, which may lead to higher- quality assessments	+	Coordination and planning may take longer
	+	Minimization of bias due to lack of vested interest in the assessment		
	+	Interviewees may be more open with		
		an objective third-party who is not		
		directly associated with management		

Best Practice

It is highly recommended that the UoA commissions a third-party to conduct an assessment, preferably fishery trade unions, social auditors, or worker rights organizations that meets the qualifications in <u>Section</u> <u>4.1</u>.

5 ANNEXES

5.1 ANNEX A: How to read the SRA

Each Principle is broken down into Components, Indicators, and Performance Indicator Scoring Guideposts (PISGs).

PRINCIPLE 1: Protect human rights, dignity and access to resources

Component 1.1: Fundamental human rights are respected, labor rights are protected, and decent living and working conditions are provided, particularly for vulnerable and at-risk groups

Indicator 1.1.1: Abuse and harassment³

The Principles, Components, and Indicators build the framework of the SRA. Each PISG within an Indicator must be evaluated to adequately assess risk level for that indicator. The aggregate of the Indicators determines an overall risk level associated with the Components and Principles once each PISG has been evaluated during the assessment.



5.2 ANNEX B: Key Informant Interview Best Practices

The following are best practices during key informant interviews:

- + Begin the interview with friendly comments and establish rapport.
- + Inform the interviewee they may opt to withhold their consent at any time and reassure them their answers will remain confidential.
- + Present yourself as an equal.
- + Mention to interviewees that you would like to take notes and ask for permission.
- + Worker/fisher/farmer interviews should take place out of view or hearing range of management.
- + Hold the interview in a location where interviewees feel comfortable, do not ask for personal information, and engage in a conversation rather than reading off a list of interview questions.
- + Clearly explain how the individual can report any retaliation from management for participating in an assessment.
- + Clarify to any worker/fisher/farmer that they may have a union/workers' organization representative present during the interview if the individual requests this.
- + Focus on issues of particular importance, for example, on findings revealed during document review or site inspection.
- + Listen, and pause for responses.
- + Patiently and respectfully explain the intent of questions if the individual is not understanding.
- + Do not ask leading questions; questions should be open-ended.
- + Avoid interruptions.

- + Keep an eye out for signs of coached workers/fishers/farmers (i.e., those that management may have coached prior to an assessment to give a desired answer, sometimes under the threat of retaliation). For example, several individuals offering identical responses may be an indication of coaching.
- + Thank the individual for their time and participation.

Best Practice

It is best practice that the assessor does not read off a list of interview questions and is prepared in advance of the assessment to facilitate natural conversations.