

A person wearing a high-visibility green and yellow safety vest is seen from the side, operating a drone. The drone is in the foreground, with its propellers blurred, suggesting it is in motion. The background is a bright, hazy sunset or sunrise, with a warm orange and yellow glow. The overall scene is outdoors, likely at a construction or industrial site.

Guidance on Remote HSAP and HESG Assessments

This guidance document is issued by the Hydropower Sustainability Assessment Council, a multi-stakeholder body responsible for governing the Hydropower Sustainability Tools. The guidance was published by IHA Sustainability Ltd in January 2021 in accordance with a decision of the Council's executive committee in October 2020.

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This paper outlines the circumstances in which it may be possible to conduct remote Hydropower Sustainability Assessment Protocol (HSAP) or Hydropower Sustainability Environmental, Social and Governance Gap Analysis Tool (HESG) assessments whilst upholding assessment standards. It aims to guide assessors and assessees on the suitability of remote assessments, and offers a methodology for their execution.

The guidance on remote assessments offered in this document is aligned with the International Standard ISO 19011:2018 - Guidelines for auditing management systems and the ISO 9001:2020 – Guidance on remote audits.

Background

An HSAP or HESG assessment is an audit exercise. It is a systematic, independent and documented process for obtaining and evaluating objective evidence to determine the extent to which criteria are fulfilled.

Core assessment activities are conventionally performed face-to-face. Meetings with the assessee, interviews with stakeholders and site inspections of the facilities and project area have traditionally been considered essential to be done in person by the assessor(s).

Yet, disruption caused by global events such as the Covid-19 pandemic, can compromise the assessors' ability to travel to conduct onsite activities, and potentially put at risk the health and safety of assessment participants. Such constraints can impede the execution of HSAP and HESG assessments, thus hampering the continuous momentum in sustainability assessment activity.

Advances in technology, in turn, can enable assessment activities to be carried out without the physical presence of the assessor on site. In other words, existing information and communication technologies may enable a **remote assessment**, where assessors use only electronic means to carry out certain assessment activities and in some cases the entire assessment. This includes: engaging and negotiating with the assessee, planning the work, reviewing documentation, doing interviews, performing visual inspection, and finalising the report.

The ISO 19011:2018 (Guidelines for auditing management systems) defines remote audits as the use of information and communication technologies (ICT) to gather information, interview an auditee, etc., when "face-to-face" methods are not possible or desired.

Quality Control

It is fundamental to guarantee that remote assessments are conducted objectively and with credibility, upholding the process quality and integrity, and achieve the assessment objectives. Ultimately, the assessor and assessee will evaluate the opportunities and risks, and judge if the fundamental requirements to achieve the assessment objectives are met. The outcome of this evaluation can be one of the following:

- The assessment objectives can be achieved with the remote assessment – a remote assessment can be done following the remote assessment methodology;
- The assessment objectives can be achieved partially – a remote assessment may be done partially and later complemented with an on site assessment;
- The assessment objectives cannot be achieved via remote assessment.

The final assessment report shall be shared with ME for quality control and validation of remote assessment methodology and results.

The following pages describe a methodology, define the requirements, and outline opportunities and risks for remote HSAP and HESG assessments.

Methodology

General assessment activities

The remote assessment process should follow the same stages as traditional assessments. There should be, however, more regular remote meetings between the assessors and the Single Point of Contact/Local Support Team throughout the assessment process. This is relevant to check and re-check the quality and effectiveness of remote activities, address contingency measures (if necessary).

The table below describes the general assessment activities.

Activity	Technology
<ul style="list-style-type: none"> • Establishment ○ Identify objectives ○ Assess feasibility and risks with the assessee ○ Determine the different technologies used and how they will be used ○ Allocate Single Point of Contact and Local Support Team ○ Agree on communication protocols and confidentiality agreement ○ Consider whether the final report is to be made public or not ○ Test the use of videoconference to confirm that there is a stable connection (can be repeated in the planning phase) 	<ul style="list-style-type: none"> ○ email ○ phone call ○ videoconference ○ file sharing platform
<ul style="list-style-type: none"> • Planning ○ Provide background information ○ Identify interviewees ○ Identify documentary evidence ○ Identify the technology requirements 	<ul style="list-style-type: none"> ○ email ○ phone call ○ videoconference ○ file sharing platform
<ul style="list-style-type: none"> • Remote assessment ○ Opening meeting, potentially with people from different sites ○ Assessor team meetings ○ Meetings with Single Point of Contact ○ Closing meeting 	<ul style="list-style-type: none"> ○ email ○ phone and video call ○ file sharing platform ○ drone ○ satellite images
<ul style="list-style-type: none"> • Reporting ○ Request additional evidence ○ Prepare draft report, gather comments and finalise the report 	<ul style="list-style-type: none"> ○ email ○ phone call ○ videoconference ○ file sharing platform
<ul style="list-style-type: none"> • Validation ○ Final report to be shared with ME for quality control and validation of remote assessment methodology and results 	<ul style="list-style-type: none"> ○ email ○ file sharing platform

Evidence gathering

An assessment is an evidence-based method where assessor gathers three essential categories of evidence through documentary review, stakeholder interviews and visual inspection. Gathering and judging all three is considered essential to achieve triangulation in determining whether or not a particular criterion is met. The proposed methodology to gather evidence in a remote assessment include:

Activity	Technology
Document review (asynchronous)	<ul style="list-style-type: none"> ○ Email or file sharing platforms (e.g. google drive, dropbox, basecamp) ○ Recorded training webinars or other client events
Document review (synchronous)	<ul style="list-style-type: none"> ○ Screen sharing to visualise documents that cannot be shared ○ Video call to visualise or confirm the existence of confidential documents
Interviews	<ul style="list-style-type: none"> ○ Phone call ○ Video conference ○ Additional notes on remote interviews: <ul style="list-style-type: none"> ▪ ensure there is no noise disturbing the communication ▪ minimise interruptions ▪ when there are breaks, ensure the sound is mute and image switched off to ensure privacy
Remote site inspection (asynchronous)	<ul style="list-style-type: none"> ○ Recorded site video inspection ○ Local consultants can support by touring the site and recording video. It is important that the consultant is independent and provides an unbiased input. A local auditing firm, or university researcher could also be considered to provide this support. ○ Satellite images or Google Street View for visual inspection of reservoir, project facilities, access roads, downstream sites and hard to access areas ○ Recorded process videos ○ Recorded camera footage from surveillance cameras for observing work performed (considering social and regulatory requirements) ○ Any recorded video or image should include a time stamp to verify the date and time it was taken
Remote site inspection (synchronous)	<ul style="list-style-type: none"> ○ Live video with remote guide to observe work performed, with the help of local consultants if feasible ○ It could be possible to gather visual evidence through live video and simultaneously interview of stakeholders (e.g. an affected person showing their housing damaged by vibration). ○ Live camera footage from surveillance cameras for observing work performed (considering social and regulatory requirements) ○ Drone-assisted video for visual inspection of reservoir, project facilities, access road, downstream sites and hard to access area

Hybrid approach

Based on the methodology and quality control measures described in this paper, an assessment can be conducted through a hybrid approach, i.e. as a combination of remote and on-site activities. The decision to do so should always be agreed by the assessor and assessee.

A hybrid approach could be followed when a remote assessment is not progressing according to the agreed methodology and the objectives are expected to be only partially achieved with remote activities. In this scenario, an in-person site inspection would be conducted by the assessor(s) before finalising the assessment.

A hybrid approach could also be pursued from the outset. In this case, the majority of assessment activities would be executed remotely and complemented by an in-person site inspection done by the assessor(s).

Requirements

The feasibility of remote assessment activities can depend on several factors in order to achieve the proposed objectives. The assessor and assessee will have to consider opportunities and risks, and guarantee that all requirements to achieve the assessment objectives are met.

The following list outlines the basic conditions required to conduct a remote assessment.

Technology requirements – it is fundamental that technology is available, and assessor and assessee are competent and at ease with its operation. They should ensure appropriate technology requirements, including:

- Agreed remote access protocols, including requested devices, software, etc.;
- Access to the required technology (e.g. videoconference software, drone, VPN or other file-sharing system to log into a database, etc.);
- Stable internet connection with good online connection quality;
- Checks ahead of the assessment to resolve technical issues;
- Contingency plans are available and communicated (e.g. interruption of access, use of alternative technology), including provision for extra audit time if necessary.

Confidentiality, security and data protection (CSDP) – the necessary data protection requirement and internal security regulations of the company must be ensured in advance. That implies both the assessor and assessee agree with the use of technology and with the measures to fulfil these requirements. Assessors need to request permission in advance in the following activities such as: taking screenshot copies of documents of any kind, recording individuals, or using people's images. Evidence of agreements related to CSDP should be available. Measure to ensure confidentiality should be confirmed during the opening meeting.

Level of confidence and trust between assessor and assessee – it is important that the assessee is willing to allow the assessor's inspection of all relevant aspects of the project. The assessor should be able to determine what they want to see and have confidence in the transparency and quality of the inspection.

Level of confidence in the remote procedure – the assessor and assessee readiness will influence the assessment quality and even feasibility.

Ability to interview all relevant stakeholders – particular attention should be given to project-affected communities and vulnerable groups with limited access to technology. The assessor and assessee should ensure that local stakeholders have access to and feel comfortable with the mode of interaction, and confirm that remote interview methods are culturally appropriate.

Ability to identify interviewees – it is possible confirm the identity of interviewed people.

Ability to review all relevant documentation – assessor is confident that the assessee will provide the necessary documentary evidence to allow triangulation with other evidence, and to guide planning for verbal and visual evidence requirements.

Ability to perform a comprehensive visual inspection – assessor is confident that the assessee will provide the necessary visual evidence to allow triangulation with other evidence (e.g. assessee will not avoid showing areas of concern or areas of weak performance; or assessee is available to provide visual evidence if the assessor asks to see site locations spontaneously).

Language – if there is no common language, interpretation will be required. This can be more challenging in a phone call or videoconference. Some videoconference platforms offer synchronous interpretation (e.g. Zoom).

Independence of local consultant –local consultants/auditors/researchers/NGOs supporting the assessor in the visual inspection, should commit to provide an independent input.

Understanding of assessment limitations – the assessor and assessee need to be clear on the limitations of the assessment.

Other factors to be considered:

Assessor familiarity with the region/project – it is beneficial for the assessor to be familiar with the project or region (e.g. the assessor has previously visited the project, worked with the assessee or worked in the region);

Assessee familiarity with the traditional assessment process – it is beneficial for the assessee to be familiar with the required effort, staff engagement and timings of an assessment;

Complexity of the project – the project size and number of ancillary facilities could bring additional challenges to a virtual site inspection;

HSAP or HESG – the number of topics and requirements to assess could impact the feasibility of the remote assessment.

Above and beyond the requirements of this paper, assessors shall perform assessments with all due skill, care and diligence, abiding by the provisions of their Licence Agreement, Terms and Conditions, and the Council Charter.

Opportunities and Risks

To conduct remote assessments, the assessor and the assessee need to identify the opportunities and risks, and judge whether to proceed or not, and under which conditions.

The opportunities that remote assessments offer include:

- **Additional flexibility**
 - remote assessments can be performed when travel is restricted, or there are other health and safety risks that impede site visits;
- **Reduced health & safety risks**
 - reduced need for assessors and other workers to visit hazardous sites and locations;
 - in light of the Covid-19 pandemic, reduced risk of exposure and spread of Covid-19;
- **Quick turnover**
 - assessors could be available in shorter notice, and potentially able to perform rapid successive assessments in different locations;
- **Reduced carbon footprint**
 - reduced or eliminated air and ground travel;
- **Time efficiency**
 - reduced travel time;
- **Cost efficiency**
 - reduced travel means lower travel and accommodation expenses;
- **Interview with relevant personnel working remotely**
 - Staff working from home;
- **Stakeholder involvement**
 - potential for involvement of a well-briefed local (and independent) consultant or NGO person who can tour the site and send back video;
- **Greater geographical range for site inspections**
 - visual inspection of hard to reach site/activities, where physical observation is not feasible for safety, budget or schedule limitations;
- **Follow-up visual inspections**
 - more than one visual inspection, if required.

The risks of conducting remote assessments include:

- **Project setting:**
 - inability of the assessor to fully understand and factor in the project setting and surrounding influences;
 - inability of the assessor to notice and ask to see site locations spontaneously;

- decreased likelihood of obtaining ad hoc or informal information that could be relevant to judge gap significance;
- limited opportunities to discuss and test the existence and significance of a gap;
- **Interviews**
 - bias of the range of interviewees towards those who are most able to use remote technology;
 - potential for shorter or disrupted interviews due to technological issues, reducing time to follow up lines of enquiry;
 - increased likelihood of less information being conveyed during interviews, especially where translators are required;
 - lack of feasibility of and suitable circumstances for interviewing local communities (e.g. cultural appropriateness);
 - limited non-verbal communication
- **Visual inspection**
 - higher ability of assessees to avoid showing areas of concern and examples of weak performance;
 - inability of the assessor to notice and ask to see site locations spontaneously;
 - potential video and data manipulation;
- **Document review**
 - unwillingness of the assessees or other stakeholders to share confidential documents;
 - potential data manipulation;
- **Reputation**
 - perception among project and industry stakeholders that the assessment is biased or 'greenwash';
- **Stakeholder engagement**
 - poor quality of assessee engagement;
 - lack of client confidence in the assessor and trust in the process;
 - local consultants (to support the visual inspection) are not independent and may provide biased input;
- **Judging gap significance**
 - inability to make judgements on criteria that are qualitative (e.g. on timeliness of feedback, levels of inclusion, level of stakeholder support, FPIC, whether livelihoods are restored, etc.);
 - difficulty of judging the significance of gaps in the quality of assessments and of management.

