



## **ResponsibleSteel Assurance Manual**

Version 1.0

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29 December 2019



## Version history

No.	Date	Description
Draft 1.0	14 May 2019	First draft version. Provided to ResponsibleSteel by technical partner DNV-GL, based on the Assurance Manual of the Aluminium Stewardship Initiative (ASI)
Draft 2.0	23 August 2019	Second draft version, following revision of draft 1.0 by the ResponsibleSteel Secretariat. Circulated to ResponsibleSteel members and interested certification bodies for comment and to Assurance Services International for review
Draft 3.0	05 November 2019	Third draft version, reflecting feedback received from certification bodies, ResponsibleSteel members and Assurance Services International
Draft 4.0	10 December 2019	Fourth draft version, reflecting feedback received at auditor training workshop
Draft 5.0	16 December 2019	Fifth draft version, reflecting discussions around the certification scope (2.1.4.), the audit scope (2.1.5), the Assurance Panel (1.4.4. and 1.4.5. and 4.1. and 4.2.), and the Issues Resolution System (Annex 4, 3.4.)
Version 1.0	29 December 2019	Approved version for publication

## Disclaimer

The official language of this document is English. The definitive version is held on the ResponsibleSteel website <https://www.responsiblesteel.org/>. Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

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## Introduction

This chapter summarises the ResponsibleSteel certification programme and assurance process. The explanations provided in this introductory chapter serve as orientation and do not contain any requirements. The requirements for parties engaged in assurance activities are described in detail in chapters 1 to 11 and in the Annexes. Readers should note that ResponsibleSteel has drafted guidance on assurance-related issues, which can be found on <https://www.responsiblesteel.org/resources/>.

## About ResponsibleSteel

ResponsibleSteel is a not-for-profit organisation and the industry's first global multi-stakeholder Standard and certification initiative for responsible steel supply chains.

Our **Vision** is to maximise steel's contribution to a sustainable society.

Our **Mission** is to enhance the responsible sourcing, production, use and recycling of steel by:

- Providing a multi-stakeholder forum to build trust and achieve consensus;
- Developing standards, certification and related tools;
- Driving positive change through the recognition and use of responsible steel.

Recognising that all of these elements are important, ResponsibleSteel will focus first on the responsible sourcing and production of steel through developing an independent certification programme in line with the Codes of Good Practice set by the ISEAL Alliance. Our aim is to offer steel site certification against the ResponsibleSteel Standard from the end of 2019 and to expand the Standard to offer steel product certification from end of 2020. The rules and processes for ensuring compliance with the Standard are laid out in this assurance manual.

## The ResponsibleSteel assurance model

ResponsibleSteel's assurance model is designed to respond to stakeholder needs and expectations and to align with the requirements outlined in the ISEAL Code of Good Practice: Assuring Compliance with Social and Environmental Standards (version 2.0). To this end, the Assurance Manual focusses on the following ISEAL credibility principles:

- **Impartiality:** Fair and objective treatment of certification clients
- **Rigour:** Adequate intensity of the assurance process
- **Efficiency:** Consistent application of assurance requirements, regardless of the context or the involved individuals. Assurance activities carried out by competent individuals. Building on or aligning with other relevant systems
- **Engagement:** Providing meaningful opportunities for different stakeholders to engage in audits
- **Transparency:** With regards to the assurance process and audit results

- Accessibility: Affordable, culturally sensitive, comprehensible assurance that is within reach of the targeted certification clients

The key characteristics of audits against the ResponsibleSteel Standard are:

- Third-party audits and certification decisions to enable high levels of independence and impartiality
- Site visits to enhance confidence in audit findings
- Stakeholder engagement in audits to ensure a rich and balanced collection of information and evidence
- Transparent audit findings and certification decisions to build and maintain trust in the ResponsibleSteel programme

ResponsibleSteel's assurance system will be regularly reviewed to reflect emerging good practice in assurance and to take account of implementation experience by:

- Auditors
- Sites and certification clients
- Assurance Panel members
- The ResponsibleSteel Secretariat and
- Other stakeholders

Revisions and changes to the assurance system and their effective dates will be clearly and promptly communicated to these parties.

## About this document

The ResponsibleSteel Assurance Manual has been primarily written for certification bodies carrying out certification activities for the ResponsibleSteel programme. It is also relevant to the ResponsibleSteel Secretariat and the Assurance Panel. The Assurance Manual describes the roles of all parties involved in the assurance system and the processes and rules that apply when:

- Approving certification bodies and auditors eligible to assess sites against the ResponsibleSteel Standard
- Verifying conformity of a site with the Requirements of the ResponsibleSteel Standard
- Taking certification decisions and issuing ResponsibleSteel certificates
- Providing the transparency that is needed for stakeholders to understand certification decisions
- Dealing with issues raised in relation to any aspect of the ResponsibleSteel programme
- Managing appeals against certification decisions
- Overseeing effectiveness of the assurance system, including competence of individuals.

Requirements are stated in normative language while guidance is written in *italics*. Guidance is not mandatory but provides further information, good practice or advice.



Responsibility for the Assurance Manual and its content rests with the ResponsibleSteel Secretariat. The first draft version of the Assurance Manual was provided to ResponsibleSteel by our technical partner DNV-GL who used the Assurance Manual of the Aluminium Stewardship Initiative (ASI) as primary reference since ResponsibleSteel and ASI often work with comparable supply chain companies. The ResponsibleSteel Secretariat revised and amended version 1.0 to tailor the document to the ResponsibleSteel programme and to reflect stakeholder needs and expectations. In doing so, we drew from ISO 17021:2015 (parts 1 and 2) and the draft Certification Body Requirements of the 'Initiative for Responsible Mining Assurance' (IRMA). The resulting draft version 2.0 was shared with ResponsibleSteel members and interested certification bodies for feedback and comment. It was also reviewed by 'Assurance Services International', a specialised body working with a number of voluntary sustainability certification programmes, to ensure the Assurance Manual is functional and can deliver on the ISEAL credibility principles outlined above. Following this round of reviews, the ResponsibleSteel Secretariat revised the Assurance Manual (draft 3.0) and discussed specific aspects of it with auditors, Assurance Services International and steel companies. Based on the discussions, draft version 4.0 was developed and discussed with the Standards and Assurance Committee of the ResponsibleSteel Board. After further changes, the final draft version of the Assurance Manual (5.0) is put to the full ResponsibleSteel Board for sign-off.

The first year of implementing the ResponsibleSteel certification programme will be an important learning period. 2020 will help us understand what further oversight activities will be needed to ensure a high-quality assurance system. It will also show whether any requirements specified in the Assurance Manual need clarification or adaptation to strengthen their implementation. For these reasons, we anticipate that this Assurance Manual will be revised after the first year of implementation. ResponsibleSteel also reserves the right to review any other aspect of its certification programme in 2021 to make sure it is fit for purpose.

## **Roles and Responsibilities**

In summary, the roles and responsibilities of the parties involved in the assurance system are as follows.

### **ResponsibleSteel Secretariat**

The roles and responsibilities of the ResponsibleSteel Secretariat include:

- Leading the drafting and regular review of the:
  - ResponsibleSteel Standard, including the Implementation Instructions
  - Assurance Manual
  - Issues Resolution System to address concerns, complaints and appeals
  - Logo and claims use rules and guidance
  - Any associated scheme documentation
- Recommending certification bodies and auditors for approval by the ResponsibleSteel Assurance Panel
- Training and calibrating certification bodies and auditors

- Coordinating the activities of the ResponsibleSteel Board
- Receiving concerns, complaints and appeals and identifying the most appropriate way and party to handle them
- Issuing licenses for the use of ResponsibleSteel logos and claims and monitoring their use
- Maintaining up-to-date information on the assurance system and on certified sites on the ResponsibleSteel website
- Maintaining records on all relevant aspects and outcomes of the assurance system and process
- Maintaining and implementing an assurance system risk management plan, including the prevention of risk
- Monitoring effectiveness of the assurance system and identifying and implementing improvement opportunities
- Monitoring, evaluating and publicly reporting on the impacts of ResponsibleSteel certification in the context of ResponsibleSteel's strategy.

Apart from the initial approval and ongoing training and calibration of certification bodies and auditors, ResponsibleSteel is committed to overseeing their competence. ResponsibleSteel reserves the right to partly or fully outsource the oversight function to a specialised body such as Assurance Services International.

### **ResponsibleSteel approved certification bodies and auditors**

In summary, the roles and responsibilities of approved certification bodies and auditors include:

- Embedding the ResponsibleSteel requirements in their internal management system
- Participating in training and calibration activities as required by ResponsibleSteel
- Ensuring competence of auditors and other personnel involved in assurance activities
- Conducting audits, taking certification decisions and issuing ResponsibleSteel certificates
- Preparing audit reports for certification clients and audit report summaries for publication on the ResponsibleSteel website
- Carrying out monitoring and surveillance activities
- Handling concerns, complaints and appeals

### **Certification clients and site management**

The roles and responsibilities of certification clients and site management include:

- Contracting an approved certification body as listed on the ResponsibleSteel website to conduct audits against the ResponsibleSteel Standard
- Defining the audit scope and certification scope
- Carrying out a self-assessment against the ResponsibleSteel Standard, collecting supporting evidence, relevant media articles and other publications in preparation for the third-party audit and in line with this assurance manual

- Providing auditors and, if requested, the ResponsibleSteel Secretariat or the appointed Oversight Body with access to facilities, relevant information and records
- Facilitating auditor interviews with site management, workers and other stakeholders
- Supporting the auditors in stakeholder identification
- Informing the auditors of any changes to their business and their activities, and of any incidents that might impact their governance, social or environmental performance
- Identifying the root causes of non-conformities, defining and implementing corrections and corrective action to address these non-conformities
- Cooperating in the resolution of concerns, complaints and appeals, as requested
- Providing information to the ResponsibleSteel Secretariat, where requested.

### **ResponsibleSteel Assurance Panel**

The roles and responsibilities of the ResponsibleSteel Assurance Panel include:

- Participating in training and calibration activities as required by ResponsibleSteel
- Reviewing audit reports submitted by certification bodies in line with the assurance manual
- Where requested by the ResponsibleSteel Secretariat, supporting resolution of issues in line with ResponsibleSteel procedures.

### **ResponsibleSteel Board**

The roles and responsibilities of the ResponsibleSteel Board include:

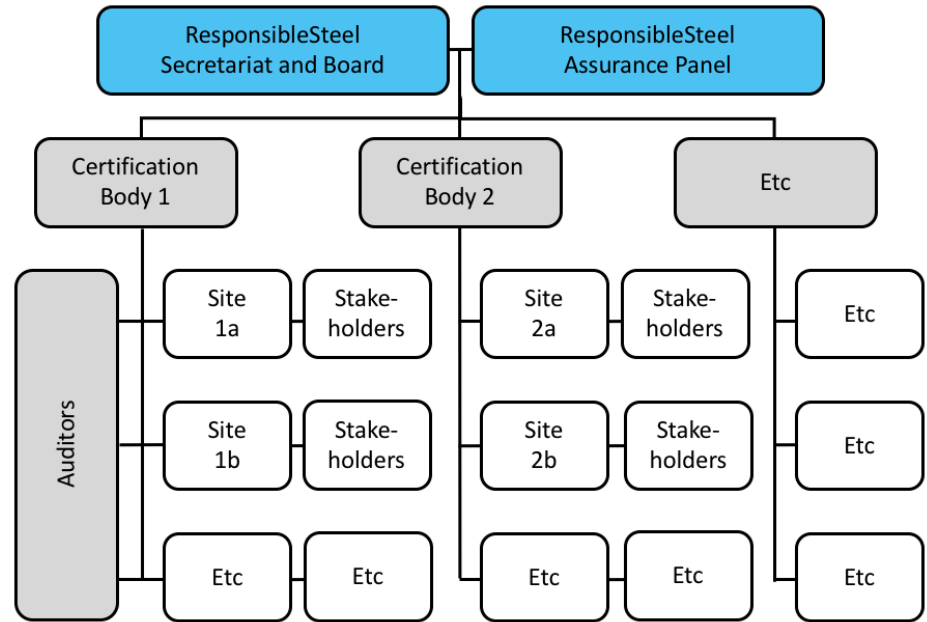
- Approving the Terms of Reference and procedures for development of the ResponsibleSteel Standard and the assurance programme and ensuring the Terms of Reference and procedures are followed
- Commissioning the drafting and regular review of the:
  - ResponsibleSteel Standard, including the Implementation Instructions
  - Assurance Manual
  - Issues Resolution System
  - Trademark use rules and guidance
  - Any associated scheme documentation
- Ratifying the above-mentioned documentation
- Approving certification bodies and auditors
- Reviewing applications and selecting members of the ResponsibleSteel Assurance Panel
- Ensuring effective implementation of the risk management plan
- Ensuring effectiveness of the assurance system
- The Board may delegate some or all of its responsibilities to Board Committees at its discretion

**ResponsibleSteel members**

- Reviewing and approving the ResponsibleSteel Standard
- Providing input to other ResponsibleSteel scheme documentation
- Ratifying membership of the ResponsibleSteel Assurance Panel

Figure 1 below summarises the ResponsibleSteel assurance model and the roles associated with it. The roles, processes and rules are described in detail further below.

Figure 1: Summary of the ResponsibleSteel assurance model



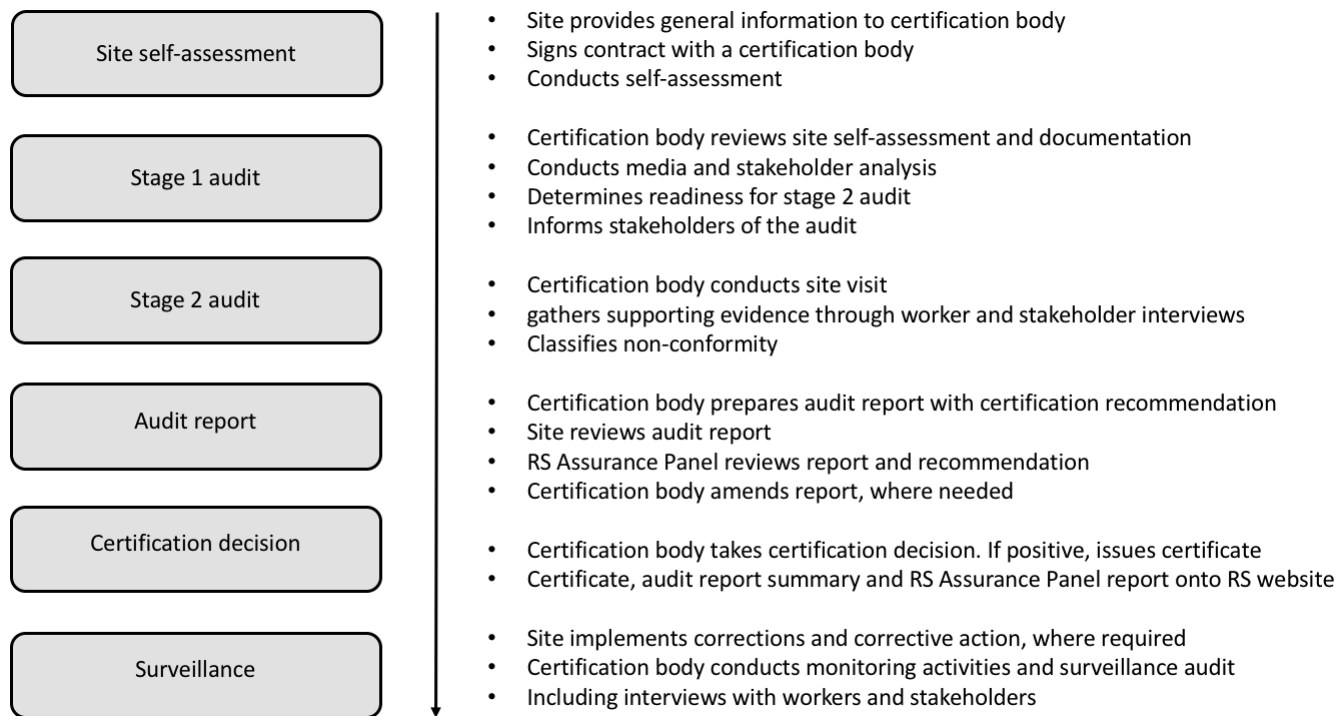
In the ResponsibleSteel model, certification bodies and auditors are approved by the ResponsibleSteel Board. The certification bodies sign contracts with certification clients and conduct the audits, including site visits and stakeholder engagement. Based on the audit findings, the certification bodies draft audit reports and make certification recommendations. The ResponsibleSteel Assurance Panel will review the audit report and either support or disapprove of the certification recommendation. It might request changes to the audit report before certification decision-making can commence. The certification body will take the decision on certification. In case of a positive decision, the certification body will issue a certificate to the certification client. For further details on the various roles see above.

# The ResponsibleSteel certification process

## Overview of the certification process

Certification against the ResponsibleSteel Standard starts with a self-assessment conducted by the site that wishes to become certified. The self-assessment is done in the Implementation Instructions document and forms the basis for the ResponsibleSteel certification process, which has six main steps as illustrated in Figure 2 below.

Figure 2: Summary of the six main steps in the ResponsibleSteel certification process



The certification cycle is the period that certification is valid and is 3 years. To maintain ResponsibleSteel certification after the initial certificate has been granted, certified clients must pass a surveillance audit and ongoing monitoring activities and, at the end of the certification cycle, a re-certification audit. The types of audits in the ResponsibleSteel programme and their frequency are shown in the table below.

Table: ResponsibleSteel audit types and frequencies

Audit type	Frequency
Initial certification audit	Once, when certification client applies for ResponsibleSteel certification
Surveillance audit and ongoing monitoring	18 months after initial or re-certification In addition, ongoing monitoring activities
Re-certification audit	At the end of the certification cycle (3 years)

## 1. Certification body and auditor approval and maintenance of approval

### 1.1. General requirements

1.1.1. Only certification bodies that are approved by ResponsibleSteel or an Oversight Body appointed by ResponsibleSteel may sign contracts with certification clients and make references to offering ResponsibleSteel auditing activities. Approved certification bodies shall be understood as those published on the ResponsibleSteel website with their company name, full address and contact person's details.

1.1.2. Only auditors that are approved by ResponsibleSteel or the appointed Oversight Body may carry out audits against the ResponsibleSteel Standard. Approved auditors shall be understood as those being listed with their full name and contact details on the auditor registry maintained by ResponsibleSteel or the appointed Oversight Body.

### 1.2. Normative and supporting documents

1.2.1. The following normative documents in their most recent published versions shall be considered part of the ResponsibleSteel assurance system:

- a) ResponsibleSteel Standard
- b) ResponsibleSteel Implementation Instructions
- c) ISO 19011: Guidelines for auditing management systems
- d) ISO 17021: Conformity assessment - Requirements for bodies providing audit and certification of management systems (Parts 1 and 2)

1.2.2. Certification bodies and auditors shall follow the ResponsibleSteel requirements in the case of a conflict with ISO 17021 or ISO 19011.

1.2.3. The following supporting documents inform the ResponsibleSteel assurance system:

- a) 'ResponsibleSteel Certification for Sites', explaining the certification process and the roles and responsibilities of sites and certification clients
- b) ResponsibleSteel logo / claims use rules and guidance<sup>1</sup>

All normative and supporting documents developed by ResponsibleSteel can be found on the ResponsibleSteel website under <https://www.responsiblesteel.org/certification>.

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<sup>1</sup> Document is in development and its name is to be confirmed

### 1.3. Certification body approval by ResponsibleSteel

1.3.1. To apply for approval, the certification body shall:

- a) Be a legal entity
- b) Be an Associate Member of ResponsibleSteel to demonstrate its commitment to the ResponsibleSteel vision and mission
- c) Be ISO 17021 accredited with a relevant scope such as ISO 9001 (Quality management systems), ISO 14001 (Environmental management systems) or ISO 45001 (Occupational health and safety management systems, or BS OHSAS 18001 until transitioned to ISO 45001) by an accreditation body that is a member of the International Accreditation Forum (IAF)
- d) Commit to incorporating the ResponsibleSteel programme into its internal management system
- e) Complete the ResponsibleSteel certification body application form (see Annex 1) and submit it via email to [assurance@responsiblesteel.org](mailto:assurance@responsiblesteel.org) together with the documentation listed on the form
- f) Sign a contract with ResponsibleSteel or the appointed Oversight Body
- g) Pay to ResponsibleSteel an approval fee of 3000 USD for 2020. In case the certification body's approval application is rejected, ResponsibleSteel shall refund 2000 USD.

1.3.2. The contract shall contain clauses that specify:

- a) That the certification body shall comply with the requirements of the ResponsibleSteel Assurance Manual and ISO 17021, parts 1 and 2
- b) That copies of all documentation relating to the certification body's ResponsibleSteel auditing activities shall be made available to ResponsibleSteel or the appointed Oversight Body at the request of the ResponsibleSteel Secretariat or the appointed Oversight Body
- c) That the certification body consents to being subject to oversight activities carried out by ResponsibleSteel or its appointed Oversight Body to maintain approval
- d) That certification bodies shall not transfer their ResponsibleSteel approval to another legal entity or to a different business unit within the same entity
- e) That the certification body shall pay 1000 USD for each audit report that is submitted to the Assurance Panel for review.

1.3.3. Where there are significant changes to the certification body's status or operations during the approval process, the ResponsibleSteel Secretariat or the appointed Oversight Body may request that they submit a new application.

#### *Guidance on the approval fee*

*ResponsibleSteel reserves the right to revise its approval fee after 2020. However, the aim of the fee is to cover the costs for oversight and for the Assurance Panel activities. It is not meant to generate profit for ResponsibleSteel.*

#### *Guidance on significant changes*

*These may include changes to the certification body's organisational structure, business or to procedures that are relevant to the ResponsibleSteel certification programme.*

1.3.4. Within 4 weeks of receipt, the ResponsibleSteel Secretariat or the appointed Oversight Body shall:

- a) Review the application form and submitted documentation
- b) Carry out due diligence on the certification body
- c) Write a positive or negative recommendation for consideration by the ResponsibleSteel Board.

If certification body documentation is found to be incomplete, the Secretariat shall request that additional information is provided, and the date for formal response shall be 4 weeks from the submission of the completed documentation.

#### *Guidance on due diligence*

*Due diligence aims to reveal any risk that a business relationship with the certification body could pose to ResponsibleSteel's reputation. ResponsibleSteel due diligence will comprise of an online search on the certification body to verify submitted information. It might also include seeking references from other scheme owners, trade associations, etc. Reasons for a negative approval recommendation could be:*

- *Evidence of fraudulent behaviour*
- *Intentional provision of false information or concealing information*
- *Regulatory non-compliance*
- *Assessment of track record of complaints or appeals against issued certificates or other relevant accreditations*
- *Assessment of track record of complaints against the certification body.*

Within the 4 weeks of receiving the recommendation, the ResponsibleSteel Board shall review and accept or reject the ResponsibleSteel Secretariat's recommendation in writing.

1.3.5. In case the application is rejected, the ResponsibleSteel Board shall provide a written explanation to the ResponsibleSteel Secretariat or the appointed Oversight Body. The ResponsibleSteel Secretariat or the appointed Oversight Body shall forward the explanation to the certification body within 1 week and shall keep the explanation on file. The certification body may appeal the decision within 1 week of being notified of the rejection by triggering the ResponsibleSteel Issues Resolution System. If an appeal is not logged within 1 week, ResponsibleSteel shall return the refundable amount of the approval process fee to the certification body and the application will be considered closed.

1.3.6. In case the application is accepted, the ResponsibleSteel Secretariat or the appointed Oversight Body shall inform the certification body within 1 week.



#### **1.4. Maintaining certification body approval and extending geographical scope**

1.4.1. To maintain approval, the certification body shall incorporate the ResponsibleSteel programme into its internal management system, meaning it shall include ResponsibleSteel in its internal audit programme and management system reviews, and shall meet the requirements of ISO 17021, parts 1 and 2.

1.4.2. The certification body shall inform ResponsibleSteel or the appointed Oversight Body:

- a) Of the outcomes of its complaints-handling process where complaints relate to the ResponsibleSteel programme
- b) Of received appeals and shall provide a summary of the appeals process outcome.

1.4.3. The certification body shall submit to ResponsibleSteel or the appointed Oversight Body the following documentation for each of the sites applying to become certified:

- a) Site application details (including general information, the final certification scope and audit scope, see section 2.1)
- b) Stage 2 audit plan for the site, in draft or final form
- c) List of stakeholders that will be informed of the audit
- d) Audit team composition
- e) Any identified certification body and auditor conflicts of interest in relation to the site and the certification client and how they were addressed.

The documentation shall be submitted at least 4 weeks prior to the stage 2 audit of the respective site.

1.4.4. The ResponsibleSteel Secretariat or the appointed Oversight Body shall review the documentation listed under 1.4.3. and shall provide written feedback on its adequacy to the certification body within 2 weeks of receiving the documentation.

1.4.5. Where the ResponsibleSteel Secretariat or the appointed Oversight Body require changes from the certification body to any of the submitted documentation, the certification body shall incorporate these.

1.4.6. Where a certification body does not submit the listed documentation, does not follow the direction given by the ResponsibleSteel Secretariat or the appointed Oversight Body, they risk sanctions imposed by ResponsibleSteel or the appointed Oversight Body.

Sanctions include:

- a) Formal warning
- b) More intense oversight of the certification body at the expense of the certification body
- c) Suspension of certification body approval
- d) Withdrawal of certification body approval

1.4.7. Suspended certification bodies shall not sign contracts with new ResponsibleSteel certification clients. Certification bodies whose approval has been withdrawn shall not sign contracts with new ResponsibleSteel certification clients and shall not issue certificates or grant continued certification.

1.4.8. If an approved certification body wishes to extend its approval to additional countries, it shall provide evidence to the ResponsibleSteel Secretariat that it has access to sufficient resources to manage ResponsibleSteel activities in the countries it seeks approval for. Resources include:

- a) Personnel and language knowledge
- b) Management systems
- c) Affiliate offices or subcontractors
- d) Arrangements to cover potential liabilities from certification activities, etc.

1.4.9. Within 2 weeks of receiving the application to extend the geographic scope, the ResponsibleSteel Secretariat shall review the provided evidence and make a written recommendation to the ResponsibleSteel Board. The ResponsibleSteel Board shall review the recommendation and let the ResponsibleSteel Secretariat know in writing of their decision to accept or reject the extension within 2 weeks of receiving the recommendation. The ResponsibleSteel Secretariat shall inform the certification body of the decision without delay.

#### *Guidance on maintaining certification body approval*

*As stated in the introductory chapter, the year 2020 will be a learning period for all parties engaged in the ResponsibleSteel programme. ResponsibleSteel intends to review the Assurance Manual after this first year of implementation to reflect any insights gathered from the first audits. ResponsibleSteel therefore reserves the right to define further regular oversight activities such as conducting head office audits or reviewing the certification body's most recent internal audit report, and to specify sanctions procedures where certification bodies do not meet the requirements defined in this assurance manual. ResponsibleSteel might also decide to outsource some or all of the oversight activities to a specialised body. In that case, the certification body would have to adhere to the processes and procedures of that body to maintain approval.*

### **1.5. Auditor approval by ResponsibleSteel**

1.5.1. To be able to get approved, auditors shall:

- a) Meet the qualification requirements outlined in Annex 3
- b) Follow guidance on auditing provided in ISO 19011
- c) Complete the auditor application form (see Annex 2) and submit it via email to [assurance@responsiblesteel.org](mailto:assurance@responsiblesteel.org) together with the documentation listed on the form
- d) Undergo and pass training on the ResponsibleSteel Standard and Assurance Manual as requested and delivered by ResponsibleSteel or the appointed Oversight Body

- e) Receive a positive appraisal on their first stage 2 audit where ResponsibleSteel or the appointed Oversight Body request to witness it. It shall be at the sole discretion of the ResponsibleSteel Secretariat or the appointed Oversight Body to determine if more than 1 stage 2 audit of an auditor needs to be witnessed to be able to confirm their competence.

1.5.2. ResponsibleSteel reserves the right to impose further training or calibration activities on auditors where oversight activities indicate that this is necessary, and to suspend the approval of individual auditors where stakeholders have repeatedly filed complaints against them. Suspended auditors shall not engage in ResponsibleSteel audits apart from those audits that are already underway.

#### *Guidance on upholding approval*

*Processes, activities and documentation required to uphold certification body and auditor approval will be defined by ResponsibleSteel after the first year of implementing the ResponsibleSteel certification programme. These might include, for example, participation in training and calibration sessions as requested by ResponsibleSteel or the appointed Oversight Body, enquiries with certification clients and consulted stakeholders on how the audit was conducted, or being witnessed during stage 2 audits.*

## **2. Pre-audit activities**

#### *Guidance on pre-audit activities*

*Prior to the certification audit, the certification body will provide the certification client with information on the ResponsibleSteel programme. The certification client and the certification body will enter into a contract that covers the entire certification cycle. The site will provide fundamental information about its business to the certification body to inform the contract. To do so, the site will complete the 'Site application details' sheet in the ResponsibleSteel document 'Implementation Instructions', which asks for general information on the site, other certificates of the site, and the certification and audit scopes. Once the contract has been signed, the site will put together a stakeholder list, collate relevant media articles and other publications, conduct a self-assessment against the ResponsibleSteel Standard and collect the supporting evidence it deems relevant to underpin its self-assessment. All of this will be provided to the certification body so they can kick-off stage 1 of the audit.*

### **2.1. Site application**

2.1.1. Since only sites of ResponsibleSteel members can be certified, the certification body shall verify that the site is part of a business that is a ResponsibleSteel member. ResponsibleSteel certification shall be sought for individual sites, meaning sampling or grouping of sites for the purpose of certification shall not be allowed.

2.1.2. To ensure that the certification client and site understand how the audit will be conducted and what their roles and responsibilities are, the certification body shall point the certification client and site to the most

current versions of the following ResponsibleSteel documents as held on

<https://www.responsiblesteel.org/resources/>:

- a) ResponsibleSteel Standard
- b) Implementation Instructions (see guidance below)
- c) ResponsibleSteel Glossary
- d) 'ResponsibleSteel Certification for Sites'
- e) Information on using the ResponsibleSteel trademarks, being the ResponsibleSteel logo, name and approved text claims, and on making claims in relation to participation in the ResponsibleSteel programme
- f) Any other ResponsibleSteel guidance documents developed for sites.

2.1.3. The certification body shall request that the site completes the sheet 'Site application details' in the ResponsibleSteel document 'Implementation Instructions' to provide fundamental information on its business and context and to serve as the basis for a contract between the site and the certification body. The sheet asks for general information on the site, for other certifications the site holds, and for a description of the certification scope and the audit scope.

#### *Guidance on the document 'Implementation Instructions'*

*This is an Excel document provided by ResponsibleSteel that must be used by sites and certification clients, certification bodies and auditors to manage the certification process. The document consists of a number of templates with guidance and is used to provide relevant information for the contract between the certification client and the certification body, for audit planning and budgeting, and for the audit itself. Sites, certification clients, certification bodies and auditors should study the 'Implementation Instructions' document before engaging in ResponsibleSteel audits.*

#### **2.1.4. Define the certification scope**

2.1.4.1. As part of the application to the certification body, the site shall define its certification scope and shall take account of the guidance provided by ResponsibleSteel. This shall describe the facilities and associated activities that the certificate will cover in case the audit is successful. When defining the certification scope, consideration shall be given to all facilities and associated activities that could positively or negatively impact on the site's performance in relation to the Requirements of the ResponsibleSteel Standard. At a minimum, the certification scope shall include all facilities and associated activities that are directly related to steel making and processing, and which are on-site and under the control of the certification client. This includes for example, the coking, sintering, blast furnace, basic oxygen furnace, electric arc furnace, rolling and coating areas.

2.1.4.2. The certification scope shall also include facilities that provide pre-processed materials and utilities (such as, pellets, burnt fluxes, industrial gases) or intermediate products (such as coke, direct reduced iron, pig

iron) to the site, where these facilities are under the control of the certification client and are physically located on-site. Where these facilities are under the control of the certification client but are not physically located on-site, consideration shall be given to the kilometric proximity of these facilities to the site before deciding whether these facilities are in scope or not.

2.1.4.3. 'Control' shall be understood as direct or indirect ownership, direct or indirect power to remove, nominate or appoint at least 50% of the members of the board or management, day-to-day executive management, or any legally recognised concept analogous to these.

2.1.4.4. The description of the certification scope shall be accompanied by a map showing the facilities and associated activities that will be included in the site's certification scope.

2.1.4.5. The certification scope shall also identify any Requirements, Criteria or principles of the ResponsibleSteel Standard that the site assumes are not applicable to it and shall provide reasons for its assumptions (see also Requirement 2.1.1. of the ResponsibleSteel Standard).

2.1.4.6. In defining its certification scope, the site shall not exclude facilities, activities, principles, Criteria or Requirements that might contribute to its governance, social or environmental performance.

2.1.4.7. Facilities and associated activities related to raw material extraction, including the transportation of raw materials, shall not be included in the certification scope.

#### *Guidance on the certification scope*

*The certification body will review the certification scope suggested by the site and will amend it where necessary to ensure it is in line with the guidance provided by ResponsibleSteel.*

*Where the site claims that individual principles, Criteria or Requirements of the ResponsibleSteel Standard do not apply to them, their reasons for these omissions will be scrutinised by the auditors to ensure that all material social, environmental and governance impacts of the site are included in the certification scope. Principles, Criteria or Requirements that are not applicable to the site seeking certification do not have to be considered during the audit. This might apply, for example, in the case of:*

- *Principle 12 if no site closure has been announced*
- *Criterion 5.2 on security practice, where the site does not use security providers*
- *Criterion 7.4 on displacement and resettlement if displacement or resettlement did not take place and is not planned to take place.*
- *Criterion 7.2 on free, prior and informed consent if there are no indigenous peoples in the site's area of influence*
- *Criterion 7.3 on cultural heritage if there is no cultural heritage in the site's area of influence*

*It should be noted that human rights, water stewardship and biodiversity generally apply to all sites.*

### Guidance on mining activities

Mining activities are out of scope of ResponsibleSteel certification. However, the ResponsibleSteel Standard for product-level certification (to be developed in 2020) is likely to require that a certain amount of raw materials used at a site is sourced from mines that are certified to a mining certification programme that ResponsibleSteel considers to be aligned with its vision and mission.

There may be instances where there is a site with a steel plant and a mining operation. The mining operation would be out of scope of the audit and certification, as would be activities that can clearly be attributed to the mining operation, such as resettlement of local communities to expand the mine. Auditors are advised to document such instances in the audit and certification scope to limit their liability.

### 2.1.5. Define the audit scope

2.1.5.1. As part of the application to the certification body, the site shall define its audit scope, which shall consist of the certification scope and the site's area of influence. In defining the audit scope, the site shall take account of the guidance provided by ResponsibleSteel.

2.1.5.2. The site's area of influence shall be understood as the area impacted by:

	Examples
a) The site's facilities and associated activities, as described in the certification scope	
b) Other facilities and associated activities on-site or near the site that are directly related to steel making and processing, whether they are under the certification client's control or not	Power transmission corridors, pipelines, canals, access roads, water abstraction and discharge areas, construction camps. A slag site or a waste gas facility run by a service provider
c) Unplanned but predictable developments caused by the site that may occur later or at a different location	A new rolling mill that will be built in 10 years' time
d) Indirect site impacts on biodiversity or on ecosystem services upon which community livelihoods are dependent	A site expansion that creates many new jobs might result in new houses being built for people moving into the area. This leads to land clearing, disturbance of fauna and habitat fragmentation due to construction activities. It might also result in increased logging to retrieve firewood for cooking and heating
e) Associated facilities, which are facilities that would not have been constructed or expanded if the site did not exist	Railways, roads, captive power plants or transmission lines, pipelines, utilities, warehouses, logistics terminals

2.1.5.3. The area of influence as approved by the certification body shall be revised and updated by the site in case of site expansions or downsizing.

## **2.2. Contract and confidentiality agreement with the certification client**

2.2.1. The certification body shall sign a contract with the certification client that covers at least one full certification cycle, meaning the initial certification audit, ongoing monitoring activities, the surveillance audit and the re-certification audit. The contract shall be based on the information provided by the site in the 'Site application details' sheet of the Implementation Instructions document.

2.2.2. In the contract, certification bodies should reserve the right to review their quote after the stage 1 audit once they have reviewed the full documentation and self-assessment of the site. Certification bodies should also consider adding some buffer for an un-scheduled short notice or unannounced audit.

2.2.3. The contract shall contain a request to the certification client to:

- a) Complete the following sheets of the Implementation Instructions document and submit them to the certification body together with the supporting evidence listed in the document:
  - 1. Stakeholders
  - 2. Articles and other publications
  - 3. Assessment (all sheets)
- b) Inform the certification body of all regulatory non-compliances or incidents that require notification to any regulatory authority as soon as they occur
- c) Inform the certification body of changes that may affect the site's ability to conform with the Requirements of the ResponsibleSteel Standard as soon as they occur
- d) Consent to the certification body carrying out special audits on short notice or unannounced where the site seems to be affected by a major non-conformity
- e) Consent to providing the certification body with access to relevant documents, records and personnel of contractors where the activities and services carried out by them are within the scope of the audit
- f) Consent to the ResponsibleSteel Secretariat or an appointed Oversight Body to observe audits conducted by the certification body
- g) Consent to the Assurance Panel, the ResponsibleSteel Secretariat or an appointed Oversight Body to be given full access to site data, documents, evidence, stakeholder input and other sources taken into account during the certification process for the purpose of oversight or complaint investigation. This shall exclude information expressly marked as confidential and shall be on the premise that ResponsibleSteel Secretariat staff or Oversight Body staff have signed a confidentiality agreement and conflict of interest declaration with the certification body.

2.2.4. In addition, a confidentiality agreement may need to be signed between the certification body and the certification client to ensure that confidential or commercially sensitive information that the auditors might get access to during the audit is not disclosed to third parties.

*Guidance on confidentiality agreement*

*Note that some countries might require certification bodies to notify authorities of regulatory non-compliances in case the certification client has not done so. Where relevant, this should be reflected in confidentiality agreements or contracts between the certification body and the certification client.*

## **2.3. Identify stakeholders**

2.3.1. The certification body shall instruct the site to complete the sheet 'Stakeholders' in the Implementation Instructions. This shall result in a list of stakeholders that the site engages with.

2.3.2. For each stakeholder, the list shall contain:

- a) Name of organisation, if any
- b) Type of organisation, if any
- c) Name of individual
- d) Contact details of individual
- e) Most appropriate method for contacting the individual
- f) Their interests in and concerns about the site.

*Guidance on stakeholder list*

*The stakeholder list provided by the site will be reviewed and added to by the auditors, where appropriate. The stakeholders on the list will be informed by the auditors about the audit and about opportunities to provide input.*

## **2.4. Collate relevant media articles and other publications**

2.4.1. The certification body shall require that the site uses the 'Articles and other publications' sheet in the Implementation Instructions to list media articles, scientific studies and civil society publications that reflect on its social, environmental and governance performance, both positively and negatively, and cover at least the 18 months preceding the date the site submitted its application details to the certification body. The list shall include relevant online and offline articles:

- a) In local, regional and national newspapers and magazines
- b) Trade media
- c) Scientific media

It shall also cover relevant online and offline publications by civil society groups and scientific institutions. The site shall provide the certification body with access to the articles and publications.



## **2.5. Site self-assessment**

2.5.1. Prior to the stage 1 audit, the certification body shall instruct the site to conduct a self-assessment against all Requirements of the ResponsibleSteel Standard that are applicable to the site. To do this, the site shall study the Requirements of the ResponsibleSteel Standard and any associated guidance provided in the individual 'Assessment' sheets in the Implementation Instructions. The site shall classify how it believes it lives up to each of the Requirements, selecting one of the following options given in the Implementation Instructions:

- a) Fully met
- b) Partially met
- c) Not met
- d) Not applicable

2.5.2. The site shall provide comments on its self-assessment where this will contribute to the certification body's understanding of the site's operations and performance. At a minimum, the site shall identify where its classification is based on policies, procedures, etc. that are developed at corporate level for site-level implementation.

2.5.3. The 'Not applicable' option shall only be used where the site feels that any principles, Criteria or Requirements do not apply to it. Where 'Not applicable' is selected, the site shall provide reasons for why they do not apply.

2.5.4. In addition, the site shall reference the supporting evidence that underpins its classification for each Requirement, shall list the evidence in the 'Supporting evidence' sheet and shall provide the certification body with access to the supporting evidence (see guidance below).

2.5.5. Where the site cannot provide supporting evidence for individual Requirements, it should clearly outline the reasons for why these are not available.

## **2.6. Provision of information by the site**

The site shall provide the completed Implementation Instructions to the certification body and shall provide the certification body with access to relevant media articles and supporting evidence at least 2 weeks prior to the scheduled start date of the stage 2 audit.

### *Guidance on classification against Requirements*

*The classification done by the site will help the auditors understand the situation of the site, draft an appropriate audit plan and amend their budget if needed. The classification informs the audit and will be scrutinised and amended, where necessary, by the auditors during stage 1 and stage 2.*

#### *Guidance on supporting evidence*

*Supporting evidence is verifiable information gathered prior to or during an audit by the site or by the certification body. Supporting evidence can be qualitative or quantitative. Examples include:*

- *Documents, data and records: Includes policies and procedures necessary to implement the ResponsibleSteel Standard or data or records generated from the implementation of processes and procedures. Note that in very small businesses, systems do not necessarily have to be documented to be effective. Documents and records will be provided to the certification body by the site, the certification client, workers or external stakeholders.*
- *Observations: Information gathered through observation of activities and practices can also be used as supporting evidence. However, it is important to verify understanding of what has been observed. Observations will be gathered by the auditors.*
- *Interviews: Testimonials or information gathered from interviews with workers and other stakeholders (such as affected communities and labour unions) are important sources of evidence. Testimonial evidence can be verified by cross-checking it with records, on-site observations or interviews with other workers or stakeholders to ensure it is objective. Interviews will be conducted by the auditors.*

### **3. Independent third-party audit**

#### *Guidance on independent third-party audits*

*Audits are conducted by independent third-party certification bodies and auditors that must have been approved by ResponsibleSteel. The purpose of an audit is to verify that a site's policies, systems, procedures and processes are effective and conform to the Requirements of the ResponsibleSteel Standard. The self-assessment and the supporting evidence provided by the site are the basis for the audit. The media articles help the auditors understand public perception of the site and the stakeholder list supports them in identifying who to approach for input to the audit. Leaning on the logic of ISO 17021, the audit is divided into 2 stages, with the first stage serving to become familiar with site's operations and situation, and the second stage comprising the on-site visit and external stakeholder interviews.*

#### **3.1. Certification audit stage 1**

##### *Guidance on the stage 1 audit*

*In summary, the certification body will carry out the following activities during the stage 1 audit. Note that the activities are not listed in chronological order and that some activities might be carried out in parallel:*

- *Review the site's self-assessment and supporting evidence*
- *Review audit reports of relevant other certifications of the site for the purpose of recognition*
- *Review the media articles provided by the site and conduct an additional media analysis*
- *Assess the site's complexity and exposure to risk*
- *Review and determine the site's certification scope and the audit scope*

- *Identify areas of concern and determine the site's readiness for stage 2*
- *Put together the audit team*
- *Plan the audit, potentially including a revised estimate of audit time*
- *Identify and inform external stakeholders of the site audit*

3.1.1. The certification process shall start with a stage 1 audit. Stage 1 does not have to be carried out on-site. However, where the certification body believes that an on-site visit is necessary to determine whether the site is ready for the stage 2 audit, at least parts of the stage 1 audit should be carried out on-site and this should be reflected in the certification body's audit plan and budget.

3.1.2. The certification body shall check if another site of the same corporate owner is already certified as this might reduce audit time where policies, procedures, etc. are developed at corporate or group-level for implementation at site-level. Where these policies, procedures, etc. have already been audited and have been found to be in conformity with the related Requirements of the ResponsibleSteel Standard, the certification body can decide that these Requirements do not have to be audited again for the applicant site. However, if the audit of the certified site was done by a different certification body, the applicant site shall provide its certification body with access to the relevant findings of the other certification body, so that its certification body can review them before taking a decision on conformity.

3.1.3. The certification body should consider carrying out interviews with relevant personnel at corporate level, for example where a number of policies, procedures, etc. are developed at corporate level for implementation at site-level. Interview partners to consider should include the individuals responsible for the functions that relate to the policies, procedures, etc., as well as individuals responsible for group-wide occupational health and safety and environment as their views might help the certification body prepare for the stage 2 audit.

#### **3.1.4. Review the site self-assessment and supporting evidence**

The certification body shall review the site's self-assessment and supporting evidence provided via the Implementation Instructions to become familiar with the site and to inform the audit scope and audit planning.

##### *Guidance on corporate level supporting evidence*

- *Where policies, procedures, etc. are developed at corporate level for implementation at site level, the certification body may verify existence, content and relevance of the policies or procedures by working with the site or corporate owner to locate them and, potentially, seek clarification on them. Awareness and understanding of the policies or procedures as well as their effective implementation will then be verified at site-level during the stage 2 audit.*
- *In case a corporate owner seeks certification for a number of its sites, the existence, content and relevance of the policies or procedures developed at corporate level has to be verified only once and*

*not for each site. However, awareness, understanding and effective implementation of these policies or procedures has to be verified at each site.*

#### *Guidance on lack of supporting evidence*

*Lack of supporting evidence does not necessarily mean that there might be a non-conformity. For example, a site or certification client may have developed an emergency preparedness and response procedure but the need to use it has not yet arisen since there has not been an emergency so far. Therefore, records or evidence that would be generated through the application of that procedure do not exist. This does not automatically constitute a non-conformity, but the site or certification client should clearly outline the reasons for why records or evidence do not exist and should be in a position to explain how the procedure would be applied if an emergency would occur.*

*The auditors can establish whether the procedure as written meets the respective Standard Requirement.*

*However, if the auditors are unable to confirm effective implementation of the procedure, they should note this in the Implementation Instructions.*

### **3.1.5. Review existing certifications of the site**

3.1.5.1. To determine whether a finding for a specific requirement of another relevant scheme can be recognised to confirm conformity with a ResponsibleSteel Requirement, the certification body shall:

- a) Review the most recent audit report of the other scheme: Do the audit and certification scopes match the scopes defined for ResponsibleSteel? Are the supporting evidence presented in the audit report sufficient to confirm conformity with the respective ResponsibleSteel Requirement?
- b) Review outstanding non-conformities, if applicable: Does the site make adequate progress in addressing outstanding non-conformities of the other scheme?
- c) Check the other certification body: Is the body that conducted the audit on the other scheme accredited for that scheme by a member of the International Accreditation Forum (IAF)?
- d) Compare your own observations with the audit report of the other scheme: Do the auditors' own observations during the audit align with the audit report findings on the other scheme?

3.1.5.2. If the answer to a) to d) in 3.1.5.1. is yes, the certification body may recognise the other scheme finding as confirmation of conformity with the respective ResponsibleSteel Requirement and shall capture its decision in the Implementation Instructions.

### **3.1.6. Review and add to the site's articles and publication collection**

3.1.6.1. To better understand the context in which the site operates, the certification body shall review the site's collection of media articles other publications and undertake its own independent media and publication analysis or commission a specialised service provider to do so.

3.1.6.2. The certification body's media and publications analysis shall be conducted in English and in the language that is commonly used in the country or region where the site is located and shall include a review of articles and publications related to the site's operations, in particular to impacts the site may have on local communities, workers or the environment in its area of influence. The analysis shall comprise:

- a) Local, regional and national newspapers and magazines
- b) Trade media
- c) Scientific media
- d) Publications by civil society groups and scientific institutions.

3.1.6.3. The media analysis shall at least cover the 18 months that precede the submission of the site's application details to the certification body and the results of the analysis shall be listed in the Implementation Instructions.

### 3.1.7. Assess the site's complexity and exposure to risk

*Guidance on site complexity and risk exposure*

*Every site is exposed to social, environmental and governance complexity and risk. Adequately assessing complexity and risk exposure helps to:*

- *Enable sites, certification clients, auditors and ResponsibleSteel to focus on those areas of ResponsibleSteel Standard implementation that are more complex or of higher risk*
- *Optimise audit processes and costs through a better understanding of the nature and context of a site's operations*
- *Determine audit time*

3.1.7.1. When assessing a site's complexity and exposure to risk in the Implementation Instructions, the certification body shall take account of the classification in table 1. The certification body shall consider allocating more time to particular areas or issues of high complexity or risk when assessing conformity with the ResponsibleSteel Standard.

Table 1: Site complexity and risk classification

	Complexity / Risk			Comment
	Low	Medium	High	
<b>a) Environmental aspects</b>	Site conducts hot and cold forming and metal fabrication	Site conducts surface and other chemically-based treatment for metal-fabricated products	Site conducts primary production of metals (except for EAF, which falls into 'medium')	Classification is based on International Accreditation Forum (IAF MD 5:2019)

<b>b) Health and safety aspects</b>		Site conducts surface and other chemically based treatment for metal-fabricated products and for general mechanical engineering (depending on the treatment and the size of the component could be high)	Site conducts primary production of metals Or Site conducts hot and cold forming and metal fabrication	Classification is based on International Accreditation Forum (IAF MD 5:2019)
<b>c) Management system</b>	Site is certified against relevant management system standard(s) with no or few minor non-conformities	Site is certified with many minor non-conformities or at least one major non-conformity	Site does not have a certified management system or certification was suspended or withdrawn in the past 3 years	Examples include ISO 9001, ISO 14001, ISO 45001 and OHSAS 18001, UK CARES Sustainable Constructional Steel scheme
<b>d) Legal compliance</b>	Site is fully compliant with permit conditions	Site had a non-compliance resulting in a significant fine or sanction in the past 3 years	Site had a non-compliance resulting in a significant fine or sanction within the past year	A significant fine is considered > USD 10 000. Sanctions includes settlements
<b>e) Context</b>	Site is located in a country with a CPI score > 50 EPI score > 60 HFI score > 7	Site is located in a country with a CPI score 30 - 50 EPI score 60 - 50 HFI score 7 - 6.5	Site is located in a country with a CPI score < 30 EPI score < 50 HFI score < 6.5	CPI = Corruption Perceptions Index  EPI = Environmental Performance Index  HFI = Human Freedom Index
<b>f) Stakeholder concerns</b>	There are no known risks or	There are some known risks or	There are many and persisting	For example, risks or issues discussed

	issues in relation to the site	issues in relation to the site	known risks or issues in relation to the site	in the media and other stakeholder concerns
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*Guidance on environmental risk and occupational health and safety classification*

*Primary production of metals includes:*

- *Sintering*
- *Pelletising*
- *Coking*
- *Blast furnaces*
- *Basic oxygen furnaces / oxygen converter*
- *Electric Arc Furnace (EAF)*
- *DRI*
- *Secondary metallurgy (alloying)*

*Surface and other chemically-based treatment includes:*

- *Degreasing*
- *Pickling*
- *Coating*
- *Hot dip galvanising and electrogalvanising*
- *Tinplating*

*Hot and cold forming and metal fabrication includes:*

- *Hot rolling*
- *Annealing*
- *Cold rolling*
- *Other metal fabrication (forming, drawing, slitting, blanking/welding etc.)*

*Note that the different complexity and risk aspects are not weighted. A site with 2 aspects that are high complexity/risk and 4 aspects that are low complexity/risk could be assessed as low or medium complexity/risk overall. It is advised to select the medium category if, for example, the site has many actively engaged stakeholders that might want to contribute to the audit as the number of stakeholder interviews to be carried out has a direct effect on audit time, which is influenced by the overall complexity/risk assessment. A site with only a few actively engaged stakeholders and a high number of requirements to be verified at corporate or group-level rather than site-level might receive a low overall complexity/risk assessment.*

### **3.1.8. Review and determine the certification and audit scopes**

3.1.8.1. The certification body shall review the certification scope and audit scope suggested by the site in the Implementation Instructions. In doing so, the certification body shall take account of the ResponsibleSteel guidance document on how to define the certification scope and audit scope.

3.1.8.2. Where necessary, the certification body shall amend the certification and audit scopes to ensure that the site's business and area of influence are adequately reflected in line with the provisions in section 2.1 and that all applicable principles, Criteria and Requirements of the ResponsibleSteel Standard are included. In particular, if media articles, other publications or stakeholder concerns in relation to the site suggest that the audit scope is too narrow, the certification body shall widen it accordingly.

3.1.8.3. The certification body shall inform the site of the final certification scope and audit scope.

### **3.1.9. Identify areas of concern and determine readiness for stage 2**

3.1.9.1. The certification body shall identify weaknesses of the site at the Criteria level of the ResponsibleSteel Standard in the individual 'Assessment' sheets of the Implementation Instructions.

3.1.9.2. Based on the weaknesses and the information and documentation provided by the site, the certification body shall determine whether the site is ready for the stage 2 audit, shall capture this in the Implementation Instructions and shall inform the site of its conclusion.

3.1.9.3. Where the certification bodies concludes that the site is not ready for the stage 2 audit, the site may decide that it still wants to move ahead with the stage 2 audit. In any case, the response by the site shall be captured in the Implementation Instructions.

### **3.1.10. Put together the audit team**

3.1.10.1. The audit team shall be comprised of individuals with the skills and competency necessary to achieve the objectives of the audit. Each individual audit team member shall be qualified as per Annex 3 and ISO 17021 part 2, and auditors shall perform audits in accordance with ISO 19011.

3.1.10.2. Prior to being appointed to the audit team, all potential audit team members shall be asked to identify and describe any circumstances that may pose a conflict of interest for them in relation to the site and the certification client wishing to become certified.

3.1.10.3. The certification body shall analyse these circumstances and determine whether there are any real or perceived conflicts of interest:

- a) In the case of a real conflict of interest, the individual shall not be appointed to the audit team



- b) In the case of a perceived conflict of interest, the certification body shall decide if and how the perceived conflict of interest can be addressed. If it cannot be effectively addressed, the individual shall not be appointed to the audit team.

3.1.10.4. Individuals that were involved in the development of the site's or the certification client's systems, procedures or processes relevant to the ResponsibleSteel Standard or who advised on these systems, procedures or processes, shall not be part of that site's audit team.

3.1.10.5. Audit team composition, a confirmation that the team possesses the necessary skills and knowledge for the stage 2 audit, any identified conflicts of interest and how they were addressed shall be documented by the certification body in the Implementation Instructions.

3.1.10.6. The audit team:

- a) Shall be led by a lead auditor who shall be responsible for ensuring the efficient and effective conduct of the audit
- b) Shall be multi-disciplinary, with at least one team member having social auditing competencies and at least one team member having environmental auditing competencies
- c) Should include auditors who are familiar with the applicable law and cultural customs
- d) Should include local auditors who speak the language that is most commonly used by the site's workers. However, if translators are required, these should be independent of the certification client. Where this is not feasible, the reason for this shall be stated and the names and affiliations of any translators used shall be included in the audit report
- e) Should comprise male and female auditors
- f) May be supplemented by technical experts.

### **3.1.11. Determine audit time for the site**

3.1.11.1. The audit times given in table 2 shall be understood as representing the standard audit time for a site's initial certification audit as determined through the assessment of the site's exposure to complexity and risk.

3.1.11.2. The given audit times do not include travel time (en-route or between facilities), breaks and time needed for translations. The certification body shall calculate time for travel and breaks and, where applicable, for the use of translators separately and have separate budget lines for these items where necessary.

3.1.11.3. Audit time may be reduced for a site where a high number of Requirements are verified via the corporate owner or group-level. However, audit time should not be less than 80% of the audit times given in table 2.

3.1.11.4. The certification body may apply other factors it deems relevant for determining audit time and may increase audit time where they consider this necessary.

3.1.11.5. The certification body shall justify the determined audit time in the Implementation Instructions.

Table 2: Determining audit time (including stage 1 and stage 2) for initial certification of a site

Number of workers at the site	Audit time in auditor days (excluding travel time, breaks and use of translators)		
	Site exposure to complexity / risk		
	Low	Medium	High
1-5	2.5	2.5	3
6-10	3	3	3.5
11-15	3	3.5	4.5
16-25	3.5	4.5	5.5
26-45	4	5.5	7
46-65	4.5	6	8
66-85	5	7	9
86-125	5.5	8	11
126-175	6	9	12
176-275	7	10	13
276-425	8	11	15
426-625	9	12	16
626-875	10	13	17
876-1175	11	15	19
1176-1550	12	16	20
1551-2025	12	17	21
2026-2675	13	18	23
2676-3450	14	19	25
3451-4350	15	20	27
4351-5450	16	21	28
5451-6800	17	23	30
6801-8500	19	25	32
8501-10700	20	27	34
>10700	Follow progression above		

## *Guidance on audit time*

*Certification bodies should note the following:*

- *Example for auditor days: 1 auditor for 2 days = 2 auditors for 1 day = 2 auditor days*
- *The audit time for a surveillance audit is normally about 1/3 of the audit time spent on the initial certification audit. The same audit time might be calculated for special short notice and unannounced audits. The number of worker interviews and of sampled documents would also be about 1/3*
- *The audit time for a recertification audit should be calculated on the basis of updated information of the site and is normally about 2/3 of the audit time that would be required for an initial certification audit of the site if such an initial audit were to be carried out at the time of recertification (i.e. not 2/3 of the original time spent on the initial audit). This rule of thumb would also apply to the number of worker interviews and sampled documents.*

*Experience from other certification programmes suggests that the total time required for an audit is usually around twice the time that is spent on-site. In general, the time required for an audit is distributed as follows:*

- *30% of time devoted to stage 1*
- *50% of time devoted to stage 2*
- *20% of time for post-audit follow-up and reporting*

### **3.1.12. Develop the stage 2 audit plan**

3.1.12.1. In developing the stage 2 audit plan, the discrepancies between the site's self-assessment and the certification body's identification of weaknesses against the Criteria of the ResponsibleSteel Standard shall be taken into account.

3.1.12.2. The certification body shall capture the stage 2 audit plan in the Implementation Instructions and shall include the following:

- a) Audit objectives
- b) Dates, places and times of the on-site visit
- c) Meetings to be held with site management, workers and, where applicable, the site's nominated ResponsibleSteel co-ordinator
- d) Functional roles to be interviewed, number and types of worker interviews to be held, including justification for deviating from the number of worker interviews given in table 3 (below)
- e) Where applicable, dates, places and times of the visit to the certification client, corporate owner or group level
- f) Dates, places and times of interviews with external stakeholders, including, where applicable, their affiliations but not giving stakeholder names to safeguard their privacy
- g) Likely documentation to be reviewed
- h) Times for miscellaneous activities such as inductions and breaks
- i) Time to revisit and review information

3.1.12.3. The stage 2 audit plan shall be flexible to allow:

- a) Changes in emphasis during the audit where this seems appropriate
- b) Effective use of the available site and auditor resources
- c) Adjustments of timelines and agendas to ensure that stakeholders can make best use of opportunities for input and feedback.

3.1.12.4. The certification body shall consult with the site on the stage 2 audit plan. The final audit plan shall be presented to the site at least 2 weeks prior to the commencement date of the stage 2 audit.

### **3.1.13. Reaching out to stakeholders and seeking their input**

*Guidance on stakeholder engagement*

*Stakeholder engagement is a key component of the ResponsibleSteel programme. Apart from the site and certification client, stakeholders are the most substantive source of information for the auditors and successful consultation will instil confidence in stakeholders that the audit was informed by a balanced, accessible and equitable process to which they could meaningfully contribute. The requirements in this section lay the foundation for stakeholder engagement. Auditors should note that ResponsibleSteel has developed a guidance document on engaging stakeholders.*

*Note that site workers are key stakeholders as well. However, since they work on-site or for the site, they must be treated differently. For this reason, they are singled out rather than being considered as part of the other stakeholder groups.*

3.1.13.1. The certification body shall have public mechanisms that allow stakeholder comments to be submitted at any time during the audit and during the validity of a certificate. The mechanisms shall comprise a mix of channels for stakeholders to submit comments, for example through letters, emails, submissions via the certification body's website, phone calls, or by speaking to an intermediary.

3.1.13.2. The certification body shall specify how comments will be taken into consideration, either during the current or next audit, during ongoing monitoring or during a special audit.

3.1.13.3. The certification body shall review the list of engaged stakeholders provided by the site and add to it if key stakeholder groups or their representatives are missing (see section 2.3) or if stakeholders announced their interest in engaging in the audit. In particular, the certification body shall check if any stakeholders are missing that were identified through the area of influence exercise or through the media and publications analysis.

3.1.13.4. The certification body shall analyse the stakeholders on the list to understand:

- a) How they are organised, e.g. do they have representatives that could speak for them?

- b) Are there stakeholder groups that need special attention to ensure their inclusion in the ResponsibleSteel certification process? E.g., women, indigenous peoples, marginalised and vulnerable groups
- c) Their relationship with and interest in the site
- d) Their positions and concerns with regards to the site

The outputs of this exercise shall be documented in the Implementation Instructions.

3.1.13.5. The stakeholder analysis shall be updated by the certification body at least prior to each audit.

3.1.13.6. All stakeholders on the list shall be contacted at least 4 weeks prior to the first day of the stage 2 audit to inform them of:

- a) The ResponsibleSteel programme and its aims
- b) The ResponsibleSteel certification process
- c) The site applying for certification
- d) Opportunities to provide input during the certification process and ways to do so
- e) Dates available for stakeholder interviews and how to register for an interview
- f) Mechanisms for stakeholders to submit comments at any time (see guidance below)

The certification body shall use the template provided by ResponsibleSteel for informing stakeholders of the certification process and inviting them to provide input.

#### *Guidance on reaching out to stakeholders*

*Note that ResponsibleSteel will announce upcoming stage 2 audits on its website and in newsletters 4 weeks prior to the start of the stage 2 audit. The information to be published will be:*

- *Dates of the stage 2 audit*
- *Name and location of the site*
- *Activities of the site*
- *Facilities that are part of the certification scope*
- *Name and contact details of the certification body, so stakeholders can register their interest to get engaged in the audit*

3.1.13.7. In addition, the certification body shall request that the site informs the public about the certification body's mechanisms to submit comments.

3.1.13.8. About 2 weeks before the commencement of the stage 2 audit, the certification body shall remind stakeholders who have not responded about the opportunity to provide input.

3.1.13.9. The certification body's efforts for engaging stakeholders shall reflect:

- a) The scale, scope of activities, complexity and risk exposure of the site
- b) The level and nature of any past, current, and anticipated conflicts with stakeholders.

3.1.13.10. In reaching out to stakeholders, the certification body shall mind that its communication and attitude is culturally appropriate and takes account of stakeholders' technological capabilities. The certification body shall ensure that the ways for stakeholders to provide input and feedback are appropriate and responsive to their needs.

3.1.13.11. The certification body shall acknowledge received stakeholder input and shall inform stakeholders how and when their input will be taken into account.

#### *Guidance on public mechanisms to submit comments at any time*

*'Public' means that the mechanisms are accessible by the public. For example, in regions with wide-spread and stable internet coverage for the public, the mechanisms might be posted on the certification body's website. In regions where this is not the case, the mechanisms or how to access them might be posted at central locations of neighbouring communities (such as the city hall, citizen centre, church, etc.).*

*In addition to the auditor reaching out to identified stakeholders, the site is asked to help make the audit known to the public by referring to its certification body and their mechanisms for receiving stakeholder input. For example, the mechanisms might be located on the certification body's website. In this case, the site might link from an obvious location on its own website (e.g. its sustainability section) to the respective page on the certification body's website. In regions where there is no wide-spread public internet access, other ways for communicating the certification body's mechanisms should be sought. For example, the mechanism might be posted on the site's front gate.*

## **3.2 Certification audit stage 2**

#### *Guidance on the stage 2 audit*

*In summary, the stage 2 audit comprises the following activities, which are described in detail below. Note that the activities are not listed in chronological order and that some will be conducted on-site and others off-site:*

- *Site visit opening meeting and closing meeting*
- *Obtaining supporting evidence through tour of site, interviews with workers and other stakeholders, and review of additional information*
- *Cross-checking and evaluating supporting evidence and information*
- *Documenting conformities and non-conformities*
- *Evaluating overall conformity*
- *Determining any necessary follow-up action and the timing of follow-up audits*

### **3.2.1. Auditing at the Requirement level**

Each of the twelve ResponsibleSteel Principles is the basis for a number of Criteria and underlying Requirements. Conformity with the ResponsibleSteel Standard shall be audited at the level of the

Requirements specified for each Criterion. For a site to achieve and maintain certification, there shall be no major non-conformity with any Requirement. Minor non-conformities do not preclude certification but shall be corrected.

### **3.2.2. Opening Meeting**

Upon arrival of the audit team on-site, an opening meeting shall be held. The names of those present shall be recorded by the audit team. Where the opening meeting is attended by a very large number of individuals, the audit team shall at least record the names and functions of attending senior managers.

### **3.2.3. Gathering supporting evidence**

3.2.3.1. During the stage 2 audit, supporting evidence that have not been reviewed during the stage 1 audit and that are either listed in the Implementation Instructions documents or are otherwise relevant to the audit shall be obtained by the audit team through sampling. Methods to obtain supporting evidence shall include, but are not limited to:

- a) Observation of processes and activities
- b) Review of documents and records
- c) Interviews.

3.2.3.2. If the information obtained so far is contradictory or not mutually reinforcing, the audit team shall gather additional supporting evidence to determine whether conformity is given. The audit team shall record specific details of all collected supporting evidence in the Implementation Instructions document.

### **3.2.3.3. Observation of processes and activities**

During the site visit, the audit team shall seek to acquire a good understanding of the site's operations, the work environment and conditions. To this end, the audit team shall:

- a) See all facilities that, together with their associated activities, contribute to the social, environmental and governance performance of the site
- b) Receive demonstrations or explanations of activities that serve to verify the effectiveness of the site's policies, systems, processes and procedures, such as the measurement of air emissions and water quality or the identification of training needs.

*Guidance on facilities to be seen*

*Examples for this include steel shops, blast furnaces, coke plants, sinter plants, rolling mills, finishing lines and slag sites. Office buildings are not considered to contribute to a site's social, environmental and governance performance.*

#### **3.2.3.4. Review of documents and records**

The audit team shall request and review any relevant documents and records which they could not obtain from the site for the stage 1 audit or that they consider to be relevant to determine conformity levels. It is up to the audit team to decide whether any documents and records should be reviewed while on-site or whether it is feasible for them to take electronic copies and review these remotely. Remote reviews of documents and records shall happen prior to the closing meeting.

#### **3.2.3.5. Personnel and worker interviews**

3.2.3.5.1. As part of the stage 2 audit, a representative number of workers shall be interviewed. Interviews shall be conducted with:

- a) Site management
- b) Other full, part-time and temporary workers of the site and of contractors
- c) Minority and, where relevant, migrant workers of the site and of subcontractors
- d) Workers of different shifts.

3.2.3.5.2. Prior to selecting workers for interviews, the audit team shall liaise with the site to understand the composition of the workforce, including contractors.

3.2.3.5.3. The audit team shall conduct a mix of individual and group interviews in line with the numbers given in table 3. If the audit team has reason to deviate from the figures given in the table, this shall be documented and justified in the audit plan.

3.2.3.5.4. In preparing for the interviews, the audit team shall consider the guidance document provided by ResponsibleSteel on conducting worker interviews.

3.2.3.5.5. The audit team shall conduct worker interviews off-site where this is deemed appropriate or where this is requested by the respective individual due to confidentiality or comfort issues. Off-site interviews shall be held at a location where the interviewed workers feel comfortable to share their views and experiences with the audit team. The audit team may seek the support of local organisations trusted by workers for finding an adequate location.

3.2.3.5.6. If an individual prefers to be interviewed privately without the presence of other workers, the audit team shall accommodate their request.

3.2.3.5.7. Workers and their representatives shall be interviewed in a confidential setting without any supervision or management personnel present. If a labour union exists, a labour union representative shall be permitted to attend the interview at the request of the interviewee(s).



Table 3: Workers to be interviewed and time spent on worker interviews during stage 2 audits for initial certification

Number of workers	No. of individual interviews	No. of group interviews	Total workers interviewed	Total hours spent on interviews**
1-5	*	*	*	0.75
6-10	*	*	*	0.75
11-15	2	1 x 3	5	1
16-25	2	1 x 3	5	1
26-45	3	(2 x 2) and (1 x 3)	10	3
46-65	3	(2 x 2) and (1 x 3)	10	3
66-85	3	(2 x 2) and (1 x 3)	10	3
86-125	6	3 x 3	15	4
126-175	6	3 x 3	15	4
176-275	6	3 x 3	15	4
276-425	8	(2 x 3) and (1 x 4)	20	5
426-625	10	(2 x 3) and (1 x 4)	20	5
626-875	15	(2 x 3) and (1 x 4)	25	7
876-1175	15	(1 x 3) and (3 x 4)	30	7
1176-1550	20	(2 x 3) and (1 x 4) and (1 x 5)	25	7
1551 - 2025	20	(2 x 3) and (1 x 4) and (1 x 5)	35	9
2026 - 2675	20	(2 x 3) and (1 x 4) and (2 x 5)	40	9
2676 - 3450	20	(2 x 3) and (1 x 4) and (2 x 5)	40	9
3451 - 4350	25	(2 x 3) and (1 x 4) and (2 x 5)	45	11
4351 - 5450	25	(2 x 3) and (1 x 4) and (2 x 5)	45	11
5451 - 6800	25	(2 x 3) (2 x 4) (1 x 5) and (1 x 6)	50	11
6801 - 8500	25	(2 x 3) (2 x 4) (1 x 5) and (1 x 6)	50	11
8501 - 10700	25	(2 x 3) (2 x 4) (1 x 5) and (1 x 6)	50	11
> 10700	Follow progression above			

\* As deemed appropriate by the auditors

\*\* Approximate time

3.2.3.5.8. The audit team shall maintain a list of interviewed individuals. This list shall not be shared with the site or certification client. The list shall be used to ensure that different individuals are interviewed during subsequent audits or to do follow-up interviews at future audits where appropriate.

3.2.3.5.9. The audit team shall use appropriate methods to provide workers with the contact information of the audit team and of the ResponsibleSteel Secretariat or, alternatively, ensure that this information is made

available to workers by the site. Workers shall be informed that the contact information may be used to provide input to the audit in a confidential manner.

#### **3.2.3.6. Interviews with other stakeholders**

3.2.3.6.1. In addition to workers interviews, the audit team shall hold interviews with all other stakeholders that registered for an interview or agreed to be interviewed.

3.2.3.6.2. These interviews shall take place off-site, for example at town halls, offices or other appropriate locations that offer sufficient privacy for undisturbed conversations.

3.2.3.6.3. The audit team shall consider the ResponsibleSteel guidance document on engaging stakeholders when preparing and conducting the interviews.

3.2.3.4.4. The audit team shall add summaries of all conducted interviews to the audit report, ensuring that interviewed individuals cannot be identified.

#### **3.2.4. Recording audit findings and classifying conformity**

3.2.4.1. The audit team shall review and cross-check supporting evidence obtained during the audit process. Information obtained from stakeholders shall be independently corroborated from a second source, wherever possible.

3.2.4.2. Stakeholder input shall be evaluated objectively and meaningfully to determine whether it constitutes evidence of conformity or non-conformity with any Requirement of the ResponsibleSteel Standard.

3.2.4.3. The audit team shall discuss its audit findings and record and classify them in the 'Assessment' sheets of the Implementation Instructions to enable a robust certification recommendation.

#### **3.2.4.4. Documenting conformity and non-conformity**

3.2.4.4.1. The audit team shall substantiate all classifications of conformity and non-conformity with clear and concise detail about the conforming or non-conforming practice, process or outcome. The documentation of findings of conformity and non-conformity in the Implementation Instructions document shall include:

- a) A reference to the Requirement or Requirements the finding of conformity or non-conformity relates to
- b) A brief and concise description of the supporting evidence that led to the respective classification. The description shall be generalised to not compromise confidentiality, security or commercially sensitive information
- c) For non-conformities, a brief and concise description of the nature of the non-conformity

- d) An explanation of the strategy for sampling documents and interviewees and a rationale for the choice of samples.

3.2.4.4.2. The audit team shall not engage in root cause analysis of the non-conformity or otherwise assist the site in addressing the issue.

3.2.4.4.3. The audit team shall attempt to resolve any diverging opinions between the audit team and the site concerning supporting evidence or findings, and unresolved points shall be recorded by the audit team.

3.2.4.5. Where received stakeholder input does not contribute to audit findings, the nature of the input and the reasons for the omission shall be documented by the audit team in the 'Assessment' sheets of the Implementation Instructions document.

3.2.4.6. The audit team shall also record opportunities for improvement.

3.2.4.7. Where supporting evidence is known to exist or should exist, but cannot be located because of poor record keeping practices or other management issues, a non-conformity shall be raised.

#### *Guidance on documenting conformity or non-conformity findings*

*Ambiguous or poorly worded information on conformity or non-conformity findings will not be accepted by the Assurance Panel as it will prevent them from concluding whether to support or disapprove of the certification recommendation. The auditors will be requested by the Assurance Panel to revise the information. In the worst case, the audit team will have to go back to the site to revisit the issue, leading to increased cost and time, which might damage the relationship of the certification body with the site and certification client and harm the certification body's reputation. It is strongly advised to put great emphasis on high-quality documentation of audit findings.*

*The following are good practice principles for documenting non-conformities:*

- *Communicate the extent of the problem fully*
- *Use familiar terminology*
- *Do not draw unsubstantiated conclusions*
- *Do not focus on individuals or their mistakes*
- *Do not use criticism*
- *Give, where relevant and related, regulatory or external references*
- *Avoid contradictory messages*
- *Review the non-conformities with the site and certification client to ensure the facts are correct and fair.*

*The description of the supporting evidence could include, for example:*

- *Functional roles interviewed*
- *External stakeholders interviewed, respecting confidentiality*

- *Documents and records sighted and reviewed, including dates and unique identifiers*
- *Activities and facilities observed*

### 3.2.4.8. Classifying conformity

3.2.4.8.1. The audit team shall use the conformity classifications defined in table 4.

Table 4: Conformity classifications

Conformity classification	Finding
<b>a) Conformity</b>	Fulfilment of a Requirement.
<b>b) Minor non-conformity</b>	<p>A non-conformity shall be considered minor if:</p> <ol style="list-style-type: none"> <li>1. It is an isolated lapse, or</li> <li>2. It is unusual or non-systemic, or</li> <li>3. Its impacts are limited in their temporal and organisational scale, and</li> <li>4. The non-conformity does not result in a fundamental failure to achieve the objective of the relevant Requirement or related Criterion.</li> </ol>
<b>c) Major non-conformity</b>	<p>A non-conformity shall be considered major if, either alone or in combination with further non-conformities, it results in or is likely to result in a fundamental failure to achieve the objective of the relevant Requirement or related Criterion or Principle within the scope of the audit. Such fundamental failures may be indicated by non-conformities which:</p> <ol style="list-style-type: none"> <li>1. Continue over a long period of time, or</li> <li>2. Are systemic, or</li> <li>3. Affect a wide range of the site's production or of the site's facilities, or</li> <li>4. Affect the integrity of the ResponsibleSteel programme, or</li> <li>5. Are not adequately addressed by the site within the defined periods for corrections and corrective action.</li> </ol> <p>It may also be a situation where the site does not comply with applicable law or the situation presents a significant risk* to workers, the environment or communities.</p>
<b>d) Opportunity for improvement</b>	<p>A situation where the observed evidence indicates that a Requirement has been effectively implemented, but where effectiveness or robustness might be increased using a modified approach. A situation that could lead to a future non-conformity if not addressed.</p>

\* Significant risk refers to situations where there is a high chance of:

- Injury or illness to one or more people resulting in permanent partial impairment or disability or death
- Long-term grave and irreversible impacts to the environment, sensitive species, habitats, ecosystems or areas of cultural importance
- Heavily affecting a local community or multiple stakeholder groups and impacting on the site's ability to retain its 'social licence to operate'.

3.2.4.8.2. In situations that pose significant risk, the audit team shall contact the ResponsibleSteel Secretariat for guidance.

3.2.4.8.3. A group of minor non-conformities shall be elevated to a major non-conformity if there is evidence that the minor non-conformities are:

- a) Related: In terms of the Requirement, activity or nature of the non-conformity, or
- b) Repetitive: With the same issue evident throughout the site's business, symptomatic of a systemic failure or absence of controls, or
- c) Persistent: Due to ineffective corrective action to address the root cause.

#### *Guidance on elevating non-conformities*

*For example, numerous instances of missing required records across multiple different Criteria or Principles of the ResponsibleSteel Standard indicate a related and repetitive issue. In such a case, the audit team should elevate one of the minor non-conformities to a major, list all the minor non-conformities that contributed to the elevation, and explain that this minor was elevated to a major due to the related and repetitive nature.*

*Another example is where a number of minor non-conformities found across different Criteria or Principles of the ResponsibleSteel Standard indicate that implementation of policies is lacking. Since the ResponsibleSteel Standard requires that "Responsibility for implementing the values, policies and commitments defined by the corporate owner has been assigned to specific members of senior management", the audit team should raise a major non-conformity against Requirement 1.2.2. of the Standard.*

*The key to differentiating between a minor and major non-conformity classification is to assess how isolated the instances are, or whether they are related in such a manner that indicates common root causes through weaknesses in management systems.*

#### **3.2.4.9. Determining overall conformity and obligations resulting from non-conformities**

3.2.4.9.1. Table 5 sets out how overall conformity shall be determined and captured in the 'Assessment' sheets of the Implementation Instructions and outlines the obligations for follow-up action where non-conformities are identified during an audit.

Table 5: Overall conformity and obligations resulting from non-conformities

Overall conformity	Audit outcomes and site obligations
<b>a) Conformity</b>	<ol style="list-style-type: none"> <li>1. A site with zero non-conformities shall be eligible for a 3-year certificate, provided it passes ongoing monitoring activities conducted by the certification body and a surveillance audit 12 to 18 months after the certificate has been issued.</li> <li>2. The site shall have completed a re-certification audit by 3 years after the certificate has been issued, if it wishes to remain certified.</li> </ol>
<b>b) Minor non-conformity</b>	<ol style="list-style-type: none"> <li>1. A site with only minor non-conformities shall be eligible for a 3-year certificate, provided it conducts a root cause analysis and implements effective corrections and corrective actions to close out the minor non-conformities by the time of the next surveillance or re-certification audit, whichever is earlier.</li> <li>2. Effectiveness of the corrections and corrective actions and continued conformity with the ResponsibleSteel Standard shall be verified during the next audit. The certification body shall also conduct monitoring activities on the site on an ongoing basis.</li> <li>3. The site shall have completed a re-certification audit by 3 years after the certificate has been issued, if it wishes to remain certified.</li> </ol>
<b>c) Major non-conformity</b>	<ol style="list-style-type: none"> <li>1. If any major non-conformities are found during an audit, the site shall not become certified.</li> <li>2. If the site still wants to become certified or if it had already been issued a certificate, the site shall conduct a root cause analysis and develop and implement SMART (see below) plans for corrections and corrective actions to effectively address the issues within 6 months of the non-conformities being raised.</li> <li>3. The site's root cause analysis and plans for corrections and corrective actions shall be reviewed by the certification body and accepted if they meet the SMART criteria. If not accepted, the site shall revise its analysis and plans and resubmit them to the certification body.</li> <li>4. Effectiveness of the corrections and corrective actions and conformity with the ResponsibleSteel Standard shall be verified at a special audit, which shall be carried out when the site believes that it has successfully closed out the major non-conformities. If the site fails at the special audit, the site shall not become certified or, if already certified, the certificate shall be suspended.</li> <li>5. Sites that still want to become certified and suspended sites shall implement corrections and corrective actions to close out the major non-</li> </ol>

	<p>conformities by 6 months after the first special audit. Effectiveness of the corrections and corrective actions and conformity with the ResponsibleSteel Standard shall be verified at another special audit. If the site fails at this second special audit, it shall not be issued a certificate or, where already suspended, its certificate shall be withdrawn.</p> <p>6. Sites whose certificate was withdrawn and those who were not issued a certificate may choose to undergo a new certification audit once they are ready to do so.</p>
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3.2.4.9.2. The site shall record its root cause analysis and plans for SMART corrections and corrective actions in the 'Assessment' sheets of the Implementation Instructions.

*Guidance on number of findings*

*Some Requirements of the ResponsibleSteel Standard are quite complex, and so the audit team may raise more than one finding against the same Requirement. For example, there may be multiple sources of supporting evidence suggesting that the site's system to identify and comply with applicable law is not effective. Evidence may vary from a minor technical mishap such as failing to issue a compliance report on time to more serious breaches that have the potential to cause significant harm to people or the environment. In this scenario, 2 non-conformities may be raised with the late reporting issue graded as a minor non-conformity and the serious breach graded as a major non-conformity.*

*Another example may relate to a Requirement that asks for the existence and implementation of a documented process. A minor non-conformity may be raised if the documentation has some small gaps, whereas a major non-conformity may be raised if the process has not been communicated and not been properly implemented throughout the site's business, particularly if the process has been developed to control a high-risk activity.*

*Guidance on SMART plans for corrections and corrective actions*

*ResponsibleSteel has developed guidance for sites on developing plans for corrections and corrective actions that meet the SMART criteria (see below).*

- *Specific: is the correction or corrective action clear and unambiguous? Does it address the underlying cause of the non-conformity?*
- *Measurable: Can the implementation of the correction or corrective action be monitored and measured?*
- *Achievable: Does the correction or corrective action have clearly assigned responsibilities and the means for implementing the action?*
- *Realistic: Is the correction or corrective action realistic and fit for purpose, given the nature of the non-conformity? Have the means and resources been assigned to implement the correction or corrective action?*

- *Timely: Does the timeframe for completing the correction or corrective action correspond with the timelines given in Table 5 above? In some cases, actions involving capital works or approvals may require more time. In these cases, progress milestones during the certification cycle should be set and interim short-term corrective measures implemented to mitigate the effects of the non-conformity.*

### **3.2.5. Preparing the audit conclusions**

Prior to the closing meeting, the audit team shall:

- Collect and integrate the findings of conformity and non-conformity, opportunities for improvement and observations of each team member in the Implementation Instructions document
- Review the results in light of the audit objectives
- Agree upon the audit conclusions
- Agree on any necessary follow-up actions

### **3.2.6. Closing Meeting**

A closing meeting shall be conducted before the auditors depart from site to verbally present the findings to the site. The names of those present at the closing meeting shall be recorded. The auditors shall use the meeting to:

- Ensure that the site understands the findings of conformity and non-conformities as well as the opportunities for improvement
- Provide an overview of the next steps of the auditors, the certification body and the role of the site
- Communicate the timeframe for the audit report
- Explain the role of the Assurance Panel, which will review the audit report
- Communicate the recommended timing for subsequent audits (surveillance or re-certification)
- Answer any questions by the site
- Clarify misunderstandings and points of difference
- Provide information about the ResponsibleSteel Issues Resolution System, which includes the management of appeals
- Discuss any significant limitations encountered during the audit...

*Guidance on "Understands the findings"*

*"Understands the findings" does not necessarily mean that the site agrees with the findings.*

### **3.2.7. Audit report**

3.2.7.1. Within 4 to 6 weeks after the closing meeting, the certification body shall deliver an audit report to the site. The certification body shall use the ResponsibleSteel audit report template (see <https://www.responsiblesteel.org/certification>) and may pull relevant information from the Implementation Instructions document to put together the report. The audit report shall:



- a) Be written in English and, if agreed with the site, in a language other than English
- b) Summarise the auditors' findings and conclusions as to the status and effectiveness of the site's policies, systems, procedures and processes in meeting the Requirements of the ResponsibleSteel Standard
- c) Contain statements that are fair, complete and true and written in clear, concise and unambiguous language.

3.2.7.2. At a minimum, the audit report shall contain the following information:

1. General information on the site (points a) - j) may be pulled from the 'Site Application details' sheet of the Implementation Instructions):

- a) Legal name of the site
- b) Jurisdiction of incorporation of the site
- c) Name and physical address of the site
- d) Web address of the site, if applicable
- e) Contact details of the personnel coordinating the site's ResponsibleSteel application
- f) Organisational context of the site
- g) General description of the site's activities and products
- h) Number of workers (including full- and part-time and contractors) at the site
- i) Number and description of shift patterns operated at the site
- j) Description of any anticipated changes to the site's operations, such as expansions, acquisitions, divestments, etc.
- k) Any changes that have occurred since the previous audit, if applicable
- l) Noteworthy achievements or outstanding performance, if relevant.

2. Overview of audit (points a) - d) may be pulled from various sheets of the Implementation Instructions):

- a) Description of the final certification scope and audit scope
- b) Any facilities and associated activities that are directly related to steel making or processing, that are on-site or near the site and have not been included in the certification scope or audit scope, and the reasons for their omissions
- c) Non-applicable principles, Criteria or Requirements and the reasons for them not being applicable
- d) Description of site's complexity and exposure to risk
- e) The audit plan
- f) Approach to stakeholder identification and steps taken to solicit stakeholder input
- g) Any limitations or parts of the audit plan that could not be completed and reasons for these limitations, as well as any follow-up actions such as the need to review these at the next audit
- h) Any unresolved conflicts, disputes or disagreements that affected the audit, such as availability of the site's key personnel, access to documents and records, observations of activities and facilities.

3. Summary of audit findings (point e) may be pulled from the 'Assessment' sheets of the Implementation Instructions):

- a) Overall certification recommendation ((re-)certify, uphold certification, suspend, withdraw), making clear that this is currently a recommendation by the audit team which still has to be reviewed and decided on
- b) Summary of site's strengths and weaknesses
- c) Where applicable, current certification status of the site ((re-)certified, certification upheld, suspended, withdrawn)
- d) Statement on overall level of conformity
- e) Conformity classification for all the Criteria of the ResponsibleSteel Standard
- f) Summary of anonymised and non-attributable stakeholder input
- g) Explanation of how stakeholder input has been considered by the audit team and, in case of rejections, why issues were dismissed

4. Audit team (may be pulled from the 'Audit team, time and plan' sheet of the Implementation Instructions):

- a) Lead auditor and audit team member names, including technical experts, translators, observers, ResponsibleSteel principles each team member audited
- b) Explanation of how any conflicts of interest were addressed

5. Post-audit activities:

- a) Description of follow-up on non-conformities, if relevant
- b) Next audit type (surveillance or re-certification audit)
- c) Recommended timing of next audit

6. Audit results for each Requirement (may be pulled from the 'Assessment' sheets of the Implementation Instructions):

- a) All the Requirements of the ResponsibleSteel Standard, their conformity classifications, descriptions of audit findings, and supporting evidence
- b) Where the supporting evidence is a 'Public report to regulator', the link to the report on the regulator's website shall be included

3.2.7.3. The site shall be given opportunity to review the audit report for errors of fact and to ensure that confidentially agreements are met.

3.2.7.4. Within 2 weeks of receiving the report back from the site, the certification body shall send the final audit report and the completed Implementation Instructions to the ResponsibleSteel Secretariat.

## 4. Audit report review by the Assurance Panel

### 4.1. ResponsibleSteel Secretariat preparation of audit report review

4.1.1. Within 1 to 2 weeks of receiving the audit report and Implementation Instructions, the ResponsibleSteel Secretariat shall:

- a) Check that the report contains all the points listed in section 3.2.7.2 and that the certification body has followed the procedure outlined in the Assurance Manual (this document). Where there are gaps, the Secretariat shall request the certification body to amend the report by filling the gaps or by providing explanations on the gaps. The certification body shall submit the revised audit report to the Secretariat within 2 weeks of receiving the request to amend it.
- b) Ask the Assurance Panel members to identify and describe any circumstances that may pose a conflict of interest for them in relation to:
  1. The site wishing to become (re-)certified or the certification client
  2. The certification body or any audit team members who were involved in the audit of the site
  3. Any complaining party, in case the site or certification client has been or is subject to a complaint or issue addressed through ResponsibleSteel's Issues Resolution System
  4. Public controversy concerning the site.
- c) Analyse the circumstances that may pose a conflict of interest to Assurance Panel members. Where the Secretariat finds that there are conflicts of interest, the respective individuals shall not be involved in the review of the audit report and shall be informed accordingly.

4.1.2. As soon as the conflict of interest analysis has been completed and the audit report, in original or amended form, has been received from the certification body, the ResponsibleSteel Secretariat shall forward the report and the Implementation Instructions document to those Assurance Panel members who will conduct the audit report review.

### 4.2. Assurance Panel audit report review

4.2.1. Within 4 to 6 weeks of receiving the audit report and Implementation Instructions document from the ResponsibleSteel Secretariat, the members of the Assurance Panel shall:

- a) Individually review the report and, where they want to gain deeper insight, the Implementation Instructions document
- b) Hold a meeting, convened and observed by the ResponsibleSteel Secretariat, to discuss the report and the certification recommendation by the certification body.

4.2.2. Their review of the audit report and Implementation Instructions document shall help determine whether:

- a) The audit report contains sufficient detail to support an informed (re-)certification decision
- b) The supporting evidence and rationales given in the audit report support the conformity classifications

- c) The (re-)certification recommendation based on the audit report is conclusive and the defined post-audit activities are appropriate.

4.2.3. Where Assurance Panel members have questions or require further detail, they shall contact the ResponsibleSteel Secretariat at least 1 week prior to their meeting. In such cases, the ResponsibleSteel Secretariat shall liaise with the certification body to demand the required information, which shall be provided in time for the Assurance Panel meeting.

#### **4.3. Assurance Panel meeting on audit report**

4.3.1. During their virtual or in-person meeting, the Assurance Panel members shall discuss the audit report, any additional information received via the ResponsibleSteel Secretariat and, potentially, the Implementation Instructions document in light of points a) to d) in 4.2.2. above. They shall reach overall agreement, which shall be either:

- a) In support of the (re-)certification recommendation. This may include a request to the certification body to make changes to the audit report. Where changes are required, the Assurance Panel shall specify where, why and what changes shall be made, or
- b) Disapproval of the (re-)certification recommendation. This shall include a request to the certification body to make changes to the audit report and to then re-submit it for another review. The Assurance Panel shall specify where, why and what changes shall be made.

4.3.2. The Assurance Panel shall disapprove of the (re-)certification recommendation if:

- a) There was a serious procedural error in the audit process that was material to the fairness of the audit, or
- b) The certification body accepted corrections or corrective action plans by the site in relation to one or more non-conformities that cannot be implemented effectively, or
- c) The conformity classification done by the certification body in relation to one or more Requirements of the ResponsibleSteel Standard cannot be justified, and the effect of the classification was material to the (re-)certification recommendation.

4.3.3. On behalf of and following the directions of the Assurance Panel, the ResponsibleSteel Secretariat shall draft a report containing the following:

- a) Any differences of opinion that the Assurance Panel members had and how they were resolved
- b) The agreement the Assurance Panel reached and what further steps are expected from the certification body
- c) Records of all additional information that the Assurance Panel obtained during the review process.

4.3.4. Within 1 week of reaching an agreement about the (re-)certification recommendation, the ResponsibleSteel Secretariat shall forward the Assurance Panel report to the certification body.

The certification body shall be allowed 2 weeks or longer, where granted by the Assurance Panel, to:

- a) Review the Assurance Panel report
- b) Seek clarification where needed
- c) Make any changes to the audit report, as requested
- d) Where changes to the audit report make changes to the Implementation Instructions necessary, these shall be made by the certification body as well
- e) Submit the revised audit report with tracked changes and, where changes were made, the Implementation Instructions, to the ResponsibleSteel Secretariat for another review, if requested by the Assurance Panel.

#### **4.4. Audit report re-submission by certification body**

Where the certification body submits a revised version of the audit report, the ResponsibleSteel Secretariat shall forward it to the Assurance Panel without delay. Within 1 to 4 weeks of receiving the revised audit report, the Assurance Panel shall:

- a) Review the changes to the audit report as outlined in section 4.2.
- b) Discuss and conclude on the changes as outlined in section 4.3.

#### **4.5. Certification body appeal against Assurance Panel review findings**

If the certification body does not agree with the changes requested by the Assurance Panel, they may trigger the ResponsibleSteel Issues Resolution System. In such a case, no (re-)certification decision shall be made until the issue is resolved and the certification body shall inform the site and certification client accordingly.

#### *Guidance on Issues Resolution System*

*The ResponsibleSteel Issues Resolution System may be triggered by any party on any issue related to the ResponsibleSteel certification programme. This includes objections to certification body certification recommendations and Assurance Panel decisions.*

## **5. Certification and re-certification decision and publication**

### **5.1. Certification body certification decision**

If the Assurance Panel supports the (re-)certification recommendation, the certification body shall start its certification decision-making process. The information reviewed by the certification body prior to taking a certification decision shall include the Assurance Panel report and the final version of the audit report.

### **5.2. Issuing a certificate**

Sites that receive a positive (re-)certification decision shall be issued a certificate by the certification body that shows at least the following:

- a) ResponsibleSteel logo, which shall be no smaller than the logo of the certification body
- b) Name and address of the certification body
- c) Legal name and physical address of the site
- d) Where relevant, legal name and registered address of the certification client
- e) Certification scope and audit scope
- f) Any facilities and associated activities that are directly related to steel making or processing, that are on-site or near the site and that have not been included in the certification scope or audit scope
- g) Version of the ResponsibleSteel Standard and Assurance Manual that the site was audited against
- h) Date when the certificate was issued
- i) Date when the certificate will expire
- j) Date of the next scheduled audit
- k) Date when the site was first certified
- l) A disclaimer stating: "Validity of this certificate is subject to continued conformity with the applicable ResponsibleSteel Standard and can be verified at <http://www.responsiblesteel.org/>"
- m) A disclaimer stating: "This certificate does not constitute evidence that a particular product supplied by the certificate holder is ResponsibleSteel certified. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required ResponsibleSteel claim is clearly stated on sales and delivery documents"
- n) Unique certificate code, identifying the certification body, for example through its initials
- o) Authorised certification body signature

### 5.3. Publishing certification decision and summary of audit report

5.3.1. The certification body shall provide the ResponsibleSteel Secretariat with the site certificate, where one has been issued, with the final audit report and a summary thereof. The summary shall be the final audit report excluding requirement 6.a) of 3.2.7.2. (Note that 6.b) shall be included).

5.3.2. Within 1 week of receiving the documents from the certification body, the ResponsibleSteel Secretariat shall post the audit report summary, the Assurance Panel report and, where applicable, the certificate on the ResponsibleSteel website.

## 6. Surveillance

### *Guidance on surveillance*

*The aim of surveillance is to maintain confidence that the site continues to meet the Requirements of the ResponsibleSteel Standard with only minor non-conformities between (re-)certification audits. In summary, surveillance comprises the following:*

- *Ongoing monitoring of the site*
- *Surveillance audit and report, focusing on non-conformity close-out and recent developments in relation to the site*

- *Short-notice and unannounced audits, where necessary*

### **6.1. Site activities after certification**

After the certification audit and if the site has been issued a certificate and wishes to remain certified, the site shall do the following for all non-conformities:

- Engage in root cause analysis
- Develop SMART plans for corrections and corrective actions
- Record the root cause and plans in the 'Assessment' sheets of the Implementation Instructions.

### **6.2. Ongoing monitoring**

6.2.1. The certification body shall have a process for monitoring the site in-between audits and for determining appropriate action following monitoring results. The aim of this process shall be two-fold:

- Keep up to date with site-related events that might be relevant for its performance against the ResponsibleSteel Standard
- Decide whether the analysed information will be taken into account during the next scheduled audit or whether the information warrants an un-scheduled short-notice or unannounced audit to investigate the issue.

6.2.2. Ongoing monitoring shall include, at least:

- Analysis of media articles, civil society and scientific publications. Articles and publications that are relevant with regards to the site's performance in relation to the ResponsibleSteel Standard shall be recorded in the 'Articles and other publications' sheet of the Implementation Instructions
- Review of received stakeholder input, if any

6.2.3. The certification body shall record monitoring activities, their results, any actions taken and how they were determined in the 'Monitoring' sheet of the Implementation Instructions.

#### *Guidance on analysis of relevant information*

*The certification body might choose to set up Google Alerts or other online alerts specific to the site and to topics related to the ResponsibleSteel Standard to ensure it does not miss relevant information.*

### **6.3. Surveillance audit**

The certification body shall schedule a surveillance audit with the site to take place between 12 and 18 months after the certificate was issued. Depending on the performance of the site, received stakeholder input and the results of monitoring activities, the scope of stage 2 of the surveillance audit may be less extensive than stage 2 of the certification audit.

### **6.3.1. Surveillance audit stage 1**

6.3.1.1. The requirements of section 3.1.10. relating to the audit team shall also apply to surveillance audits.

6.3.1.2. Prior to stage 1 of the surveillance audit, the certification body shall ask the site to review the Implementation Instructions as follows:

- a) Update the information provided in the sheet 'Site application details' where changes have occurred
- b) Update the sheet 'Stakeholders' to reflect developments since the last audit
- c) Update the sheet 'Articles and other publications' to reflect developments since the last audit
- d) Update the status of implementation of its corrections and corrective action plans.

6.3.1.3. Stage 1 shall include a request to the site and, where relevant, the certification client to submit the following information to the certification body, covering the period since the last audit:

- a) Updated and new documentation and figures related to the site's social, environmental and governance performance, such as revised policies and procedures, air emissions data, worker data
- b) Any new audit reports of other relevant schemes
- c) Any complaints that have been received via the site's grievance mechanism

6.3.1.4. During stage 1 of the surveillance audit, the certification body shall:

- a) Review the information and updates submitted by the site and the certification client
- b) Review audit reports of other relevant schemes as per section 3.1.5. of this document
- c) Reach out to all identified stakeholders about 4 weeks prior to the stage 2 audit to seek information about any site-related events that might be relevant for the site's performance against the ResponsibleSteel Standard and to schedule interviews with stakeholders during stage 2. Identified stakeholders shall include those on the site's stakeholder list, those that the certification body identified and those that provided input during the last audit
- d) Collate and review information resulting from monitoring activities and from stakeholder input, where input has been received.

6.3.1.5. Based on the listed inputs and considering any facilities and associated activities of the site and any Requirements of the ResponsibleSteel Standard that received less attention in the previous audit, the certification body shall define the audit scope for stage 2 of the surveillance audit.

### **6.3.2. Surveillance audit stage 2**

6.3.2.1. Stage 2 of the surveillance audit shall follow section 3.2. of this document.

6.3.2.2. In addition, the certification body shall verify if the site or certification client has used the ResponsibleSteel trademarks without a signed licence agreement in place or has sold products as certified.



6.3.2.3. If the site or certification client has used the trademarks without a license agreement or sold products as certified, the certification body shall raise a nonconformity and shall instruct the site and certification client to immediately cease use of the trademarks and selling products as certified.

6.3.2.4. The certification body shall notify the ResponsibleSteel Secretariat of the non-conformity within 1 week of raising the non-conformity and, where possible, email an image of the non-conformity to the ResponsibleSteel Secretariat.

#### *Guidance on audit time for stage 2 of the surveillance audit*

*Where the certification scope remains unchanged, the on-site time required for stage 2 surveillance audits is approximately 1/3 to 1/2 the time spent on-site during the initial certification audit or the re-certification audit. The same goes for the number of conducted worker interviews and the number of taken document samples. In the case of many non-conformities requiring review and potential close-out, the on-site time for a surveillance audit, including worker interviews, may be greater than indicated below.*

### **6.3.3. Surveillance audit report**

6.3.3.1. The surveillance audit report shall meet the requirements of section 3.2.7. However, the section 'List of audit results for each Requirement' may be limited to those Requirements that were considered during the surveillance audit. Where the certification body includes the results of all Requirements, it shall highlight which results originate from the surveillance audit and which ones from the initial certification or re-certification audit.

6.3.3.2. Just like during an initial certification or re-certification audit, the site shall be given opportunity to review the audit report for errors of fact and to ensure that confidentially agreements are met. Where necessary based on feedback received from the site, the certification body shall revise the audit report within 1 to 2 weeks of receiving the report back from the site.

### **6.3.4. Surveillance decision and publication**

6.3.4.1. When the certification body has taken the decision on whether certification is upheld, it shall send the final surveillance report to the ResponsibleSteel Secretariat and to the site and certification client. The ResponsibleSteel Secretariat shall post the surveillance report on its website.

## **6.4. Special audits**

6.4.1. Where monitoring activities or stakeholder input imply that the site may face a major non-conformity, the certification body shall carry out a special audit on short notice or unannounced. The scope of short-notice and unannounced audits shall be limited to the issue(s) brought up through monitoring activities or stakeholder input.

6.4.2. The certification body may decide that the full special audit is carried out off-site with any stakeholder interviews happening remotely. However, where this is the case, the certification body shall document its reasons for doing so.

6.4.3. A short-notice audit shall follow the requirements for a surveillance audit. An unannounced audit shall consist of a stage 2 audit only and shall comply with the requirements for an audit report and for certification decision and publication of decision. However, lead times and number of taken document samples might be reduced for both types of special audits and interviews carried out with workers and external stakeholders may be limited to those who might hold relevant information in relation to the issue the special audit seeks to address.

6.4.4. Where stage 1 of the short-notice audit generates strong evidence that no major non-conformity is present, stage 2 may be cancelled. In such a case, the certification body shall draft a short audit report describing:

- a) The circumstances that led to the assumption of there not being a major non-conformity
- b) The certification body's activities and findings during stage 1
- c) The certification body's reasons to drop the case.

6.4.5. Where a stage 2 audit is carried out, the certification body shall draft a report on the special audit in line with section 3.2.7. However, the report shall be limited to those findings that were raised during the special audit.

6.4.6. The certification body shall send the special audit report to the site to check for errors of fact.

6.4.7. Within 2 weeks of receiving the report back from the site, the certification body shall send the final special audit report and the completed Implementation Instructions to the ResponsibleSteel Secretariat. Section 4 of this document shall apply. When the Assurance Panel supports the certification recommendation and is satisfied with the special audit report, the ResponsibleSteel Secretariat shall publish it on the ResponsibleSteel website.

6.4.8. The circumstances that led to the assumption of there being not a major non-conformity shall be reviewed by the certification body during the next regular surveillance or (re-)certification audit.

## 7. Re-certification

Sites that wish to remain certified shall undergo a re-certification audit, which is a new full 2-stage certification audit. The re-certification audit shall be completed before the current site certificate expires. The re-certification audit shall follow the requirements of sections 2 to 5 of this document.

*Guidance on timing of re-certification audit*

*Note that ResponsibleSteel will not extend existing certificates unless there are exceptional circumstances that are beyond the control of the site and the certification body (such as political unrest, explosion, flood, earthquake).*

## 8. Record keeping

The certification body shall retain the following records in relation to certified sites, previously certified sites and, where relevant, certification clients for the duration of the current certification cycle plus 1 full certification cycle:

- a) Completed Implementation Instructions
- b) Audit reports
- c) All received stakeholder input
- d) All media articles and other publications
- e) Records relating to implementing the issues resolution procedures
- f) Evidence of audit team member competence and of the absence of conflicts of interest and, where relevant, on how conflicts of interest were addressed.

## 9. ResponsibleSteel Oversight

9.1. The ResponsibleSteel Secretariat and Assurance Panel shall carry out a number of oversight activities to support the integrity and credibility of its assurance programme. These activities are described in section 1.

9.2. In addition, the ResponsibleSteel Secretariat shall maintain public information on site certification status and assurance provider approval status on the ResponsibleSteel website.

9.3. The ResponsibleSteel Secretariat shall occasionally reviews audit reports for consistency with this assurance manual.

9.4. ResponsibleSteel may choose to outsource some or all of the oversight functions to a specialised Oversight Body.

## 10. Changes in Scope, Ownership or Auditing Body

### 10.1. Certification Scope Changes

10.1.1. The certification scope may change if there is a change to the site's business, such as:

- a) Organisational restructure
- b) Divestments and acquisitions or change to the equity share of businesses
- c) Changes to activities, products and processes

- d) Changes to the locations and distribution of the site's facilities
- e) External influences such as changes in the statutory environment, regulations and/or other stakeholder expectations and commitments that affect the site.

10.1.2. If the certification client wishes to add facilities or associated activities to its existing certification scope, a new certification audit shall be conducted, including the additional facilities and associated activities.

10.1.3. The ResponsibleSteel Secretariat shall be notified by the certification body of changes to the site's business and to the published certification scope as soon as these changes become known.

## **10.2. Divestments and acquisitions**

10.2.1. At times, the control of a certified site may change through divestment or acquisition. For the ResponsibleSteel certification status of the acquired site to continue, the new site in control, if not already a ResponsibleSteel certification client, shall become a ResponsibleSteel certification client within 6 months of the acquisition.

10.2.2. A surveillance audit of the certified site shall be conducted if already scheduled, or within 12 months of the acquisition, whichever is first. The scope of the surveillance audit shall be determined based on areas of potential changes due to the acquisition. The certification body shall document the rationale for any changes to the certification scope in the Implementation Instructions and audit report.

10.2.3. If the new owner is not a ResponsibleSteel certification client within 6 months of the acquisition, or a surveillance audit is not completed within 12 months, the ResponsibleSteel certificate covering the acquisition shall be withdrawn by the certification body.

## **10.3. Certification client changing the certification body**

10.3.1. Certification clients shall be free to select a certification body from the list of approved certification bodies and to change their certification body. However:

- a) A certification client shall not transfer to another certification body during an ongoing audit
- b) A site with suspended certification shall use the same approved certification body until the major non-conformities have been closed
- c) The validity date of the current site certificate shall not change due to the certification body transfer and any outstanding audits of the current certification cycle shall be carried out as stated in this assurance manual.

10.3.2. Certification clients may transfer from a certification body who has lost or given up ResponsibleSteel approval at any time.

10.3.3. When the time has come to transfer the certification client, the current certification body shall provide the following documentation to the succeeding certification body covering the period of the current certification cycle:

- a) Copies of previous audit reports, including reports from certification, surveillance, special and re-certification audits, as available
- b) The completed Implementation Instructions and any referenced supporting evidence
- c) Records of monitoring activities and results
- d) The collection of media articles and other publications on the certified site

10.3.4. On the date of the certification client transfer, the succeeding certification body shall inform the ResponsibleSteel Secretariat of the site's new certificate code. The ResponsibleSteel Secretariat shall update its website accordingly.

## 11. References

- Aluminium Stewardship Initiative, Assurance Manual, Version 1, December 2017
- International Accreditation Forum (IAF), MD 5: 2013, Duration of QMS and EMS Audits.
- IRMA (Initiative for Responsible Mining Assurance): Draft Certification Body Requirements, 2019
- ISEAL Alliance, Code of Good Practice for Assuring Compliance with Social and Environmental Standards, Version 2, 2018.
- ISO/IEC 17021:2015(en) Conformity assessment – Requirements for bodies providing audit and certification of management systems. Parts 1 and 2.
- ISO 19011:2018(en) Guidelines for auditing management systems
- SAAS (Social Accountability Accreditation Services): SAAS Procedure 200:2019. Audit Requirements for Accredited Certification Bodies for the SA8000 Program.

## Annex 1 (normative): Certification body application form

The form below shall be completed by certification bodies seeking approval for ResponsibleSteel. The completed form and any supporting documentation shall be submitted by email to the ResponsibleSteel Secretariat at [assurance@responsiblesteel.org](mailto:assurance@responsiblesteel.org) or to the appointed Oversight Body. Note that only application forms submitted in English can be considered.

The submitted information shall be reviewed by ResponsibleSteel or the appointed Oversight Body to determine whether the certification body meets the requirements described in section 1.3.

Certification body detail	
Certification body legally registered name and address	<i>Please state the address of the certification body's office that is responsible for its ResponsibleSteel application</i>
Contact person for ResponsibleSteel	<i>Please state their name, position, email and phone number</i>
Legal status (please attach documentation) and company registration number or equivalent	<i>E.g. company, sole trader, non-profit E.g. certificate or articles of incorporation</i>
Tax number or equivalent	
VAT number or equivalent	
Certification body motivation to seek approval for ResponsibleSteel	
Details of certification body offices that want to get approved for ResponsibleSteel and for which countries	<i>Please state their legally registered name, address and VAT number</i>
Certification body evidence that it has access to sufficient resources to manage ResponsibleSteel activities in the countries it seeks approval for	<i>Resources include personnel, language knowledge, management systems, affiliate offices or subcontractors, arrangements to cover potential liabilities from certification activities, etc.</i>
Description and documentation of certification body structure	<i>Describe your relationship with other entities, e.g. within your organisation, with other divisions of your group, with other legal entities E.g. attach organisation and/or group chart</i>
Description of all conformity assessment services you offer and, if applicable, where you are accredited for them	
Description of consultancy, training and other services offered in the steel sector and links to relevant webpages	<i>Describe the services offered by you, other departments in your organisation or other divisions of your group Provide links to webpages where these services are described</i>
Description of certification body's quality management system	
Documentation of quality management system (please attach)	<i>E.g. quality manual</i>
Description of how the ResponsibleSteel programme will be incorporated into the certification body's internal management system	

Evidence of ISO 17021 accreditation and scopes you consider to be relevant for ResponsibleSteel (please attach)	<i>E.g. ISO 9001, ISO 14001, ISO 45001</i>
Description of any incidents of the certification body's accreditation for ISO 17021 being suspended or withdrawn	<i>Explain when and why suspension or withdrawal occurred and measures taken by the certification body to become re-accredited</i>
Number and locations of auditors that currently meet the ResponsibleSteel qualification requirements	
Description of how auditor qualification is secured	
Description of structures to safeguard impartiality of auditors	

## Annex 2 (normative): Auditor application form

The form below shall be completed by auditors seeking approval for ResponsibleSteel audits and applying for participation in ResponsibleSteel auditor training. The completed form, an updated CV and any supporting documentation shall be submitted by email to the ResponsibleSteel Secretariat at [assurance@responsiblesteel.org](mailto:assurance@responsiblesteel.org) or to the appointed Oversight Body. Note that only application forms submitted in English can be considered.

The submitted information shall be reviewed by ResponsibleSteel or the appointed Oversight Body to determine whether the auditor meets the minimum qualification requirements and to organise auditor trainings. The details submitted to ResponsibleSteel or the appointed Oversight Body shall be kept confidential. In completing the form, auditors shall consider the details outlined in Annex 3 (Minimum auditor qualification requirements).

Auditor details	
Full name	
Email address	
Country in which they live	
Countries in which they work	
Languages in which they work	
Name of ResponsibleSteel-approved certification bodies they have a relationship with and the nature of that relationship	<i>E.g. staff or contractor for certification body xyz</i>
Duration and completion dates of relevant auditor training courses (please attach documentation)	
Number of relevant audits conducted and industries in which these audits were conducted	

Level and disciplines of education (please attach documentation)	
Number of years of relevant professional experience and fields in which that experience was gained (please attach documentation)	
Relevant background knowledge (please attach documentation if available)	

## Annex 3 (normative): Minimum auditor qualification requirements

1. All auditors: Qualification requirements	
1.1. Knowledge of audit practices and techniques	<ul style="list-style-type: none"> <li>a) Successful completion of a 4 to 5-day auditor training course based on ISO 19011 principles and participation in at least 5 on-site audits of large-scale industrial sites or operations in the metal smelting, refining or processing industry in the last 3 years OR</li> <li>b) Participation in at least 10 on-site audits of large-scale industrial sites or operations in the metal smelting, refining or processing industry in the last 3 years</li> <li>c) In addition to a) or b), continued professional development as relevant for the types of conducted audits, e.g. through advanced courses.</li> </ul>
2. Social auditors: Additional qualification requirements	
2.1. Academic degree or relevant professional experience	<ul style="list-style-type: none"> <li>a) Academic degree in a social science OR</li> <li>b) High school (or similar) graduation plus at least 3 years of professional experience in one of the following areas: <ul style="list-style-type: none"> <li>1. Human relations</li> <li>2. Occupational health and safety</li> <li>3. Compliance</li> <li>4. Occupational psychology</li> <li>5. Other areas with a human-centred focus</li> </ul> </li> </ul>
2.2. Relevant background knowledge	<p>Familiarity with laws, agreements, conventions, standards or guidelines in at least 2 of the following areas:</p> <ul style="list-style-type: none"> <li>a) Human rights (e.g. UN Guiding Principles on Business and Human Rights, human rights impact assessment, rights-compatible grievance mechanisms)</li> <li>b) Labour (e.g. ILO Core Conventions, employment laws, other labour standards)</li> <li>c) Occupational health and safety (e.g. ILO Occupational Health and Safety Conventions, OHS regulations, health and safety risk assessment, workplace monitoring)</li> </ul>



	<p>d) Responsible Business Conduct (e.g. OECD Due Diligence Guidance for Responsible Business Conduct)</p> <p>e) Responsible Supply Chains (e.g. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas)</p> <p>f) Stakeholder engagement (e.g. AA1000 Stakeholder Engagement Standard)</p> <p>g) Sustainability (e.g. IFC Environmental and Social Performance Standards, UN Global Compact)</p>
2.3. Relevant auditor practice	<p>At least half of the audits mentioned under 1.1. above shall have been conducted against a standard or against specifications with a social dimension, such as:</p> <p>a) AA1000 SES</p> <p>b) Corporate social responsibility specifications</p> <p>c) SA8000</p> <p>d) ISO 20400</p> <p>e) ISO 26000</p> <p>f) ISO 45001 or OHSAS 18001</p> <p>g) ICC Labor &amp; Ethics by Verité</p> <p>h) Trade and Hired Labour Standards by FLOCERT</p> <p>i) Social Compliance Management System by WRAP (Worldwide Responsible Apparel Producers)</p>
<b>3. Environmental auditors: Additional qualification requirements</b>	
3.1. Academic degree or relevant professional experience	<p>a) Academic degree in in one of the following areas:</p> <ol style="list-style-type: none"> <li>1. Civil engineering</li> <li>2. Process engineering</li> <li>3. Environmental or natural resources management</li> <li>4. Environmental science</li> <li>5. Sustainable development</li> </ol> <p>OR</p> <p>b) High school (or similar) graduation plus at least 3 years of professional experience in positions with a strong environmental focus working with large-scale industrial sites</p>
3.2. Relevant background knowledge	<p>Familiarity with laws, agreements, conventions, standards or guidelines in at least 2 of the following areas:</p> <ul style="list-style-type: none"> <li>• Greenhouse gas emissions</li> <li>• Air emissions</li> <li>• Water</li> </ul>

	<ul style="list-style-type: none"> <li>• Waste</li> <li>• Biodiversity, ecosystem services</li> <li>• Environmental and Social Impact Assessment methodologies</li> <li>• Responsible Business Conduct (e.g. OECD Due Diligence Guidance for Responsible Business Conduct)</li> <li>• Responsible Supply Chains (e.g. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas)</li> <li>• Stakeholder engagement (e.g. AA1000 Stakeholder Engagement Standard)</li> <li>• Sustainability (e.g. IFC Environmental and Social Performance Standards, UN Global Compact)</li> </ul>
3.3. Relevant auditor practice	<p>At least half of the audits mentioned under 1.1. above shall have been conducted against a standard or against specifications with an environmental dimension, such as:</p> <ul style="list-style-type: none"> <li>• ISO 14001</li> <li>• ISO 14064</li> <li>• ISO 14404</li> <li>• ISO 20400</li> <li>• ISO 50001</li> <li>• Corporate social responsibility specifications</li> </ul>
<b>4. Lead auditors: Additional qualification requirements</b>	
4.1. Audit management skills	<ul style="list-style-type: none"> <li>a) Successful completion of a 4 to 5-day auditor training course based on ISO 19011 principles and participation in at least 15 on-site audits of large-scale industrial sites or operations in the metal smelting, refining or processing industry</li> <li>b) Experience in allocation of team resources</li> <li>c) Experience in stakeholder engagement, including managing conflicts</li> <li>d) Experience in external team representation during audit process.</li> </ul>

## Annex 4 (normative): Issues Resolution System

### Introduction to the ResponsibleSteel Issues Resolution System

ResponsibleSteel is a not-for-profit organisation and the industry's first global multi-stakeholder Standard and certification initiative for responsible steel supply chains.

Our **Vision** is to maximise steel's contribution to a sustainable society.

Our **Mission** is to enhance the responsible sourcing, production, use and recycling of steel by:

- Providing a multi-stakeholder forum to build trust and achieve consensus;
- Developing Standards, certification and related tools;
- Driving positive change through the recognition and use of responsible steel.

Any party may bring forward any concerns they might have in relation to the ResponsibleSteel programme. The ResponsibleSteel Issues Resolution System outlined in this document is designed to understand the issues that are brought to ResponsibleSteel's attention and to get them resolved in an efficient and fair manner with the stakeholder raising the issue and with other relevant parties.

This document is normative and shall be published on the ResponsibleSteel website. The pathways described in this document shall be used by all involved parties to raise or resolve issues. Where the document refers to 'ResponsibleSteel', this means the ResponsibleSteel Secretariat.

## 1. Overview of the ResponsibleSteel Issues Resolution System

### 1.1. Outline of the resolution process

There are three steps in the ResponsibleSteel Issues Resolution System:

- Step 1: Initial discussion of the issue with ResponsibleSteel.**
- Step 2: Resolution using appropriate pathway.** If the issue is not resolved during the initial discussion, a resolution pathway is selected depending on the type of issue. These pathways include investigation and consideration by the site or certification body giving rise to the issue, by the ResponsibleSteel Secretariat, the ResponsibleSteel Board of Directors or their subcommittees, a relevant ResponsibleSteel working group, or a combination thereof. Stakeholders should note that the ResponsibleSteel certification programme requires sites and certification bodies to have a publicly accessible complaints mechanism (Criterion 6.2 of the ResponsibleSteel Standard (for sites) and chapter 8.1 and 9.8 of ISO 17021 for certification bodies).
- Step 3: Escalation to an Ad-Hoc Resolution Committee.** If the issue remains unresolved, an Ad-Hoc Resolution Committee is formed if the stakeholder wishes to proceed with resolution. The stakeholder may ask for the support of an advisor in this process. Decisions by an Ad-Hoc Resolution Committee are final and cannot be appealed.

The three steps and the different resolution pathways are explained in detail further below.

### 1.2. Using the Issues Resolution System

ResponsibleSteel stakeholders may contact ResponsibleSteel about an issue via email or letter using the following contact details:

Mail: PKF Newcastle Pty Limited (ResponsibleSteel company secretary)  
PO Box 2368  
Dangar, NSW, Australia  
2309

Email: [issues@responsiblesteel.org](mailto:issues@responsiblesteel.org)

### **1.3. Informing Stakeholders about the Issues Resolution System**

The contact details for raising issues with ResponsibleSteel shall be published on the ResponsibleSteel website. Efforts shall also be made to ensure that all ResponsibleSteel stakeholders are made aware of the existence of the ResponsibleSteel Issues Resolution System (e.g., through e-newsletters, outreach during ResponsibleSteel site assessments, etc.). As resources allow, ResponsibleSteel will provide instructions for its Issues Resolution System in languages other than English.

### **1.4. Assistance in raising issues**

Stakeholders may appoint representatives or advisers to accompany them in raising their issue with ResponsibleSteel. Where stakeholders want to raise an issue with ResponsibleSteel, but do not have sufficient knowledge of English, they may ask ResponsibleSteel for translation or help in a language they understand. Enquiries in that regard may be sent to [issues@responsiblesteel.org](mailto:issues@responsiblesteel.org). To help with the enquiry, stakeholders are advised to use an online translation platform such as <https://translate.google.com/> or <https://www.deepl.com/translator>.

### **1.5. Confidentiality**

Stakeholders may bring forth their issue confidentially and should inform ResponsibleSteel upfront if they do not want to be identified to other parties. If stakeholders do not even want to share their identity with ResponsibleSteel, they can still bring their issue forward. In such cases, however, stakeholders should make sure that they provide sufficient detail and supporting evidence and information for ResponsibleSteel to explore the issue since ResponsibleSteel will have no way of seeking clarity or further detail from them.

### **1.6. Safeguarding stakeholders' rights and freedoms**

The ResponsibleSteel Issues Resolution System shall not be used to substitute, circumvent or override the legal rights of any party to use judicial mechanisms.

Any retributions or reprisals against stakeholders raising issues in relation to the ResponsibleSteel programme shall not be tolerated.

### **1.7. Conflict of interest**

Any individual involved in the investigation or decision-making on an issue shall declare any actual and potential conflict of interest they may have or may be perceived to have in the proceedings and shall disqualify themselves accordingly. Conflict of interest shall be understood as interests, activities or relationships of an individual that compromise or may appear to compromise the individual's impartiality or professional responsibilities.

### **1.8. Rejecting issues**

Note that ResponsibleSteel may reject an issue if:

- a) It is based upon hearsay or is raised anonymously without any evidence

- b) There is compelling evidence that the issue raised is frivolous, malicious, trivial or generated to gain competitive advantage
- c) It is related to aspects that are not covered by the ResponsibleSteel programme and, in particular, by the ResponsibleSteel Standard and the ResponsibleSteel Assurance Manual.

### **1.9. Ceasing resolution**

Note that ResponsibleSteel may cease its attempts to find resolution if the stakeholder that raised the issue is not making a good faith effort to participate in the proposed resolution pathways.

### **1.10. Analysis of issues**

All issues that are raised with ResponsibleSteel shall be logged and analysed. ResponsibleSteel analysis of issues shall include:

- a) Clustering of issues by nature and by object
- b) Reviewing outcomes of resolutions
- c) Gauging levels of satisfaction of stakeholders raising issues

The analysis shall be used by ResponsibleSteel to identify patterns and overarching issues, make conclusions about the effectiveness of the Issues Resolution System and to inform reviews of the ResponsibleSteel programme.

### **1.11. Reporting on issues**

Summaries of the issues and of the resolutions and the total number of raised and resolved issues shall be published on the ResponsibleSteel website. This shall be done in a manner that respects the confidentiality of stakeholders.

## **2. The 3 steps of ResponsibleSteel Issues Resolution System**

### **2.1. Step 1. Initial discussion of the issue with the ResponsibleSteel Secretariat**

The first step in the ResponsibleSteel Issues Resolution System is to contact ResponsibleSteel. Stakeholders may do so by phone, by email, by letter or by Whatsapp using the contact details above.

When a stakeholder makes contact with ResponsibleSteel, they should be prepared to let ResponsibleSteel know:

- a) Their full name and contact details
- b) The nature and context of the issue they would like to see resolved
- c) When or over what period of time a particular issue took place
- d) Who has been or is involved in the issue
- e) What kind of evidence or additional information the stakeholder might be able to provide or reference in support of the issue
- f) Any steps the stakeholder has already taken to try to resolve the issue and what the outcomes were
- g) What process the stakeholder feels would be appropriate to address the issue.

As a first step, the ResponsibleSteel Secretariat shall try to resolve the issue through an informal discussion with the person raising the issue.

## 2.2. Step 2. Resolution using appropriate pathway

The following table summarises the main types of issues that are expected to be raised by stakeholders and the related resolution pathways, which are described in more detail further below.

Type of Issue	Description
1. Issues related to actions / inactions of a certified site	Concerns may be raised that a certified site is not meeting one or more Requirements of the ResponsibleSteel Standard.
	<b>Resolution pathway:</b> Site → certification body → ResponsibleSteel → Ad-Hoc Resolution Committee  Note that if the concern suggests a grave and urgent issue that might pose danger to life due to wilful actions of the site, ResponsibleSteel shall divert from the described resolution and engage with the site directly, and, if necessary, also engage with relevant authorities.
2. Issues related to actions / inactions of a certification body	Examples may include, but are not limited to: complaints <sup>2</sup> against audit findings (e.g., failure to raise a nonconformity, incorrectly raising a non-conformity, incorrectly classifying a non-conformity as minor or major), issues with auditor behaviour, with how audit procedures were implemented, lack of impartiality, etc.
	<b>Resolution pathway:</b> Certification body → ResponsibleSteel → Ad-Hoc Resolution Committee
3. Appeals <sup>3</sup> related to decisions made by a certification body	In the context of certification decisions, appeals may only be made by entities that were subject to the adverse decision. (Other stakeholders can file complaints with certification bodies if they disagree with a certification decision). Appeals may be made against a decision to award, suspend, withdraw or re-issue a certificate.
	<b>Resolution pathway:</b> Certification body → ResponsibleSteel → Ad-Hoc Resolution Committee
4. Issues related to ResponsibleSteel policies or procedures	Issues may relate to the content or interpretation of ResponsibleSteel policies or procedures. Procedures and policies include, but are not limited to, Standard Development Procedures, ResponsibleSteel governance policies, Membership policies, Assurance Manual, Claims policies, etc.
	<b>Resolution pathway:</b> ResponsibleSteel → ResponsibleSteel Board subcommittee → ResponsibleSteel Board

<sup>2</sup> A complaint is an expression of dissatisfaction, other than an appeal, by any person or organisation, relating to the activities or lack of activities of a certificate holder, a certification body, or an accreditation body, where a response is expected (Adapted from ISO/IEC 17000:2005).

<sup>3</sup> An appeal is when a site requests a certification body to reconsider a decision the certification body has made in relation to the site (Adapted from ISO 17000 - Conformity assessment - Vocabulary and general principles).

Type of Issue	Description
5. Issues related to the ResponsibleSteel Standard	<p>In every standard, there is some room for interpretation of the requirements and for differences in interpretation by stakeholders, including certification bodies, certified sites and those wanting to become certified.</p> <p>In addition to interpretation questions, there may be concerns relating to the content of the Standard itself. Stakeholders may believe that key requirements are missing or that some aspects of the ResponsibleSteel Standard are overly restrictive.</p> <p>Issues with the content of the Standard shall be resolved through scheduled, formal revision of the Standard, for which there is a separate Standards Development Procedure (available at <a href="https://www.responsiblesteel.org/resources/">https://www.responsiblesteel.org/resources/</a>). Questions of interpretation shall be resolved through the development of guidance, which is described further below.</p>
	<b>Resolution pathway:</b> ResponsibleSteel → ResponsibleSteel Board subcommittee → ResponsibleSteel scheduled Standard revision process
6. Issues raised against ResponsibleSteel personnel	<p>Concerns may be raised about technical aspects of the work of ResponsibleSteel personnel, about their behavior, actions or inaction. These types of concerns shall be heard independently of the personnel that is causing concern.</p> <p>Personnel shall include ResponsibleSteel Secretariat staff, Board members, contractors, etc.</p>
	<b>Resolution pathway:</b> ResponsibleSteel personnel → ResponsibleSteel Executive Director → Ad-Hoc Resolution Committee
7. Other types of issues relating to the ResponsibleSteel programme	<p>Stakeholders might raise issues that are not listed here. If such an issue is brought forward, ResponsibleSteel may propose one of the listed pathways or define another pathway for resolution.</p> <p>Examples of 'other' types of issues may include, but are not limited to, improper use of claims or labels; complaints related to ResponsibleSteel members.</p>
	Resolution depending on the issue brought forward

Once the issue is clearly understood, a pathway for resolution shall be chosen and implemented (see below) in consultation with the person that raised the issue and with other parties involved. When the steps for resolution are complete and any agreed actions have been taken, the issue shall be considered resolved and closed, unless the stakeholder wishes to take things further for consideration by an Ad-Hoc Resolution Committee. When the issue is closed, a summary of the issue, of the resolution outcome and the taken actions shall be posted on the ResponsibleSteel website, respecting confidentiality of stakeholders.

### 2.3. Step 3. Escalation to an Ad-Hoc Resolution Committee

If all efforts to resolve an issue have been exhausted, stakeholders may raise the issue with an Ad-Hoc Resolution Committee. The Committee shall be put together specifically to address their issue. It shall comprise three members and its composition shall depend on the nature of the issue. Representatives of the following parties might be members of the Committee:

- ResponsibleSteel Board (see <https://www.responsiblesteel.org/about/board-and-secretariat/>)
- ResponsibleSteel Board working groups (consisting of subject experts)
- ResponsibleSteel members and associates (see <https://www.responsiblesteel.org/membership/members-and-associates/>)
- Academia from fields relevant to the ResponsibleSteel programme
- Civil society (such as trade unions, human rights or environmental organisations)
- Specialists in overseeing certification bodies and working with certification programmes

Conditions for being part of the Ad-Hoc Resolution Committee shall be:

- Extensive knowledge on the ResponsibleSteel programme
- Expertise in the area that the issue is related to
- No conflict of interest in relation to the object of the issue (which could be a site, a certification body or ResponsibleSteel personnel)

ResponsibleSteel shall seek the stakeholder's consent to the suggested members of the Committee before confirming its final make-up.

Where possible, costs for investigating the issue should be shared between ResponsibleSteel and the stakeholder that raised the issue. This shall be discussed and agreed with the stakeholder before the Ad-Hoc Resolution Committee is formed. Examples of potential costs include, but are not limited to, hiring an advisor and/or interpreter to assist a stakeholder during the resolution process, site visits or research to support the Ad Hoc Committee's understanding of the issue.

Investigation by the Ad-Hoc Resolution Committee shall be the final stage in the ResponsibleSteel Issues Resolution System and decisions by the Committee cannot be appealed.

## 3. Resolution Pathway Procedures

The following section describes the different resolution pathways in detail:

1. Issues related to actions / inactions of a certified site
2. Issues related to actions / inactions of a certification body
3. Appeals related to decisions made by a certification body
4. Issues related to ResponsibleSteel policies or procedures
5. Issues related to interpretation of the ResponsibleSteel Standard



6. Issues raised against ResponsibleSteel personnel
7. Other types of issues relating to the ResponsibleSteel programme
8. Ad-Hoc Resolution Committee

The timelines outlined below are goals, however, it is recognised that there may be circumstances that prevent timelines from being met (e.g., communications challenges, national or cultural holidays, or other issues).

ResponsibleSteel will strive to meet the timelines and if they cannot be met will inform relevant stakeholders of expected new timelines.

### 3.1. Issues related to actions / inactions of a certified site

Overview		
<p>Concerns might be raised about a certified site potentially not meeting relevant Principles, Criteria or Requirements of the ResponsibleSteel Standard. There might also be concerns about a site's performance in general. In these instances, ResponsibleSteel shall require that the person raising the concern first tries to resolve the issue directly with the site. The site is best placed to explain what it is or is not doing about the issue, and why that might be the case. The ResponsibleSteel Standard requires that every site participating in ResponsibleSteel must have a grievance mechanism for the effective resolution of concerns and disputes. The stakeholder shall be advised to use this mechanism first.</p> <p>To assist the stakeholder in this, ResponsibleSteel shall discuss the issue with the person concerned to help identify the nature of the issue in relation to the ResponsibleSteel Standard, and shall help the stakeholder locate the site's grievance mechanism. ResponsibleSteel shall, however, not intervene with the site at this stage, or give an indication as to whether it feels the site has addressed the issue correctly or not.</p> <p>If the issue is not resolved with the site itself, the next avenue for resolution shall be the complaints mechanism of the respective certification body (which can be found on the ResponsibleSteel website).</p> <p>ResponsibleSteel shall only consider the issue again after it has been raised with the site and the certification body, and if neither have been able to resolve the issue satisfactorily through their processes. However, if the concern suggests a grave and urgent issue that might pose danger to life due to wilful actions of the site, ResponsibleSteel shall divert from the described pathway and engage with the site directly, and, if necessary, also engage with relevant authorities.</p>		
Process		
ResponsibleSteel shall capture the initial concern in its issues log.		Within 1 week of receiving concern
ResponsibleSteel shall help the person raising the issue identify which chapter or Requirement of the ResponsibleSteel Standard the issue relates to and, where appropriate, provide the stakeholder with additional information on the ResponsibleSteel programme to ensure they understand its objectives, scope and ways of operating.		

<p>ResponsibleSteel shall advise the stakeholder to:</p> <ul style="list-style-type: none"> <li>• Access the site's complaints and grievance mechanism to try to resolve the concern</li> <li>• Trigger the certification body's complaints mechanism if the issue is not resolved</li> <li>• Return to ResponsibleSteel to seek further assistance if the issue is still not resolved to the person's satisfaction.</li> </ul> <p>ResponsibleSteel shall also help locate the site's grievance mechanism and the certification body's complaints mechanism.</p>	
ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.	
ResponsibleSteel shall publish a summary of the issue and of the resolution pathway on the ResponsibleSteel website.	
<b>Supporting documentation and references</b>	
<ul style="list-style-type: none"> <li>• ResponsibleSteel Issues Log Template</li> <li>• ResponsibleSteel Standard (Chapter 1.4 Complaints and Grievance Mechanism and Access to Remedy)</li> <li>• ISO 17021, part 1 (Chapter 9.8 Complaints)</li> </ul>	

### 3.2. Issues related to actions / inactions of a certification body

Overview
<p>ISO 17021, upon which the ResponsibleSteel Requirements are based, asks that certification bodies have public processes to receive, evaluate and make decisions on complaints. The ResponsibleSteel Assurance Manual asks that certification bodies inform ResponsibleSteel about received complaints and their outcomes. Where a stakeholder raises issues related to audit findings, auditor behaviour, implementation of audit procedures etc., ResponsibleSteel shall require that the stakeholder first raises the concern through the complaints mechanism of the respective certification body.</p> <p>To assist the stakeholder in this, ResponsibleSteel shall discuss the issue with the person concerned to help identify the nature of the issue in relation to the ResponsibleSteel Assurance Manual or the ResponsibleSteel Standard, and shall help them locate the certification body's complaints process. ResponsibleSteel, however, shall not intervene with the certification body at this stage, or give an indication as to whether it feels the certification body has addressed the issue correctly or not.</p> <p>If the stakeholder feels that the issue has not been properly investigated by the certification body or that the outcome of the complaints process is not adequate, they may come back to ResponsibleSteel to seek further consideration of the issue. ResponsibleSteel shall identify an appropriate resolution pathway, which might be resolution through an Ad-Hoc Resolution Committee.</p>

Process	
ResponsibleSteel shall capture the initial concern in its issues log.	Within 1 week of receiving concern
ResponsibleSteel shall provide the stakeholder with additional information on the ResponsibleSteel programme to ensure they understand its objectives, scope and ways of operating and shall help the stakeholder identify the complaints mechanism of the respective certification body.	
ResponsibleSteel shall advise the stakeholder to: <ul style="list-style-type: none"> <li>• Trigger the certification body's complaints process</li> <li>• Return to ResponsibleSteel to seek further assistance if the issue is not resolved to the person's satisfaction.</li> </ul>	
ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issues to be closed.	
ResponsibleSteel shall publish a summary of the issue and of the resolution pathway on the ResponsibleSteel website.	
Once the certification body has informed ResponsibleSteel of the complaints process outcome, ResponsibleSteel shall update its issues log and publish a summary of the complaints process outcome on its website.	Within 2 weeks of receiving the summary from the certification body
Supporting documentation and references	
<ul style="list-style-type: none"> <li>• ResponsibleSteel Issues Log Template</li> <li>• ResponsibleSteel Assurance Manual (1.4.2.) and ISO 17021 (Chapters 8.1 Public Information and 9.8 Complaints)</li> <li>• ResponsibleSteel Standard</li> </ul>	

### 3.3. Appeals related to decisions made by a certification body

Overview
<p>The ResponsibleSteel Assurance Manual and ISO 17021, upon which the ResponsibleSteel Requirements are based, ask that certification bodies have processes to receive, evaluate and make decisions on appeals. They also ask that certification bodies inform ResponsibleSteel of a received appeal and send a summary of the appeals process outcome to ResponsibleSteel.</p> <p>Where a site appeals against a decision made by a certification body to certify, not to certify, suspend or withdraw certification of a particular site, ResponsibleSteel shall require that the site raises the issue through the appeals process of the respective certification body.</p>

<p>At this stage, ResponsibleSteel shall not intervene with the certification body or give an indication as to whether it feels the certification body has made the correct decision or not.</p> <p>If the site feels that the issue has not been properly investigated by the certification body or that the outcome of the appeals process is not adequate, they may come back to ResponsibleSteel to seek further consideration of the issue. ResponsibleSteel shall identify an appropriate resolution pathway, which might be resolution through an Ad-Hoc Resolution Committee.</p>	
<b>Process</b>	
ResponsibleSteel shall capture the initial concern in its issues log.	Within 1 week of receiving concern
ResponsibleSteel shall advise the site to: <ul style="list-style-type: none"> <li>• Trigger the certification body's appeals process</li> <li>• Return to ResponsibleSteel to seek further assistance if the issue is not resolved to the site's satisfaction.</li> </ul>	
ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.	
ResponsibleSteel shall publish a summary of the issue and of the resolution pathway on the ResponsibleSteel website.	
Once the certification body has informed ResponsibleSteel of the appeals process outcome, ResponsibleSteel shall update its issues log and publish a summary of the appeals process outcome on its website.	Within 2 weeks of receiving the summary report from the certification body
<b>Supporting documentation and references</b>	
<ul style="list-style-type: none"> <li>• ResponsibleSteel Issues Log Template</li> <li>• ResponsibleSteel Assurance Manual (1.4.2.) and ISO 17021 (Chapters 8.1 Public Information and 9.7 Appeals)</li> <li>• ResponsibleSteel Standard</li> </ul>	

### 3.4. Issues related to ResponsibleSteel policies or procedures

<b>Overview</b>
<p>Issues raised in relation to the content or the interpretation of ResponsibleSteel policies or procedures might show that a change to the respective policy or procedure would help improve the ResponsibleSteel certification programme. In such a case, a proposed revision shall be developed by ResponsibleSteel in consultation with the stakeholder that raised the issue and, where relevant, with other parties. The proposed revision shall be reviewed by a subcommittee of the Board, and go to the full ResponsibleSteel Board for potential approval.</p>

Where an issue is raised during an ongoing audit and relates to requirements defined in the Assurance Manual, certification bodies may classify the issue as 'urgent' to expedite the process for proposing and approving potential changes to the Assurance Manual.		
Process	Normal	Expedited
ResponsibleSteel shall capture the initial concern in its issues log.	Within 2 weeks of receiving the issue	Within a maximum of 3 days of receiving an issue marked as 'urgent', ResponsibleSteel shall review the issue and draft changes to the Assurance Manual, if appropriate. This shall be done in collaboration with the ResponsibleSteel Standard and Assurance Committee. Steps outlined in the column 'normal' do not apply
Where appropriate, ResponsibleSteel shall provide the stakeholder with additional information on the ResponsibleSteel programme to ensure they understand its objectives, scope and ways of operating.		
ResponsibleSteel shall discuss possible revisions to the policy or procedure with the stakeholder and, where relevant, with other parties. If ResponsibleSteel agrees that a change to the policy or procedure would improve the ResponsibleSteel certification programme, ResponsibleSteel shall draft revised wording. Where ResponsibleSteel does not agree that a change would lead to improvement, the issue shall be considered closed and the stakeholder shall be advised that they may raise the issue through an Ad-Hoc Resolution Committee. In such a case, ResponsibleSteel shall complete its issues log to capture what has been done and shall publish a summary of the issue and of the resolution outcome on the ResponsibleSteel website.		
ResponsibleSteel shall present the proposed changes to the policy / procedure and associated implementation timelines to the ResponsibleSteel Board subcommittee for review. The ResponsibleSteel Board subcommittee may request further information or re-drafting, may reject the proposal, or may recommend that the proposed changes and timelines are put to the ResponsibleSteel Board for approval.	Within 4 weeks of receiving the issue	
ResponsibleSteel shall seek Board approval of the changes and timelines.	Within 8 weeks of the decision of the ResponsibleSteel Board subcommittee	

<p>ResponsibleSteel shall publish the approved revised policy or procedure on its website and shall inform all affected parties of the changes and the date the policy / procedure becomes effective.</p> <p>ResponsibleSteel shall inform the stakeholder that raised the issue about the changes and the implementation timelines.</p> <p>ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.</p> <p>ResponsibleSteel shall publish a summary of the issue and of the resolution outcome on the ResponsibleSteel website.</p>	Within 2 weeks of approval	
<b>Supporting Documentation and References</b>		
<ul style="list-style-type: none"> <li>ResponsibleSteel Log Template</li> <li>ResponsibleSteel policies and procedures</li> </ul>		

### 3.5. Issues related to interpretation of the ResponsibleSteel Standard

<b>Overview</b>		
<p>Depending on the issue brought forward, guidance on how to interpret the ResponsibleSteel Standard can be developed relatively quickly, but shall be reviewed and approved by the ResponsibleSteel Standard and Assurance Committee before it becomes applicable for all sites participating in ResponsibleSteel.</p> <p>Questions on interpretation of ResponsibleSteel Requirements may come in during site audits. Where this is the case, certification bodies may classify them as 'urgent' to expedite the process for developing interpretation guidance and to not hold up the audit.</p> <p>All interpretation guidance shall be reviewed, and may be revised, during the scheduled, formal ResponsibleSteel Standard review process.</p>		
<b>Process</b>	<b>Normal</b>	<b>Expedited</b>
ResponsibleSteel shall capture the initial concern in its issues log.	Within 1 week of receiving the issue	Within a maximum of 3 days of receiving an interpretation issue marked as 'urgent', ResponsibleSteel shall draft interpretation guidance. If
Where appropriate, ResponsibleSteel shall provide the stakeholder with additional information on the ResponsibleSteel programme to ensure they understand its objectives, scope and ways of operating.		
<p>ResponsibleSteel shall carry out an analysis of the issue in consultation with the person raising the concern and, possibly, with certification bodies and sites. The analysis shall include:</p> <p>a. How ResponsibleSteel interprets the Requirement(s);</p>	Between 1 and 4 weeks of receiving the issue	

<p>b. How the Requirement(s) are actually interpreted;</p> <p>c. The reasons for the actual interpretation; and</p> <p>d. Possible additional guidance to ensure the Requirement(s) is interpreted consistently.</p>		necessary, this shall be done in collaboration with the
If it appears that the development of interpretation guidance is needed, ResponsibleSteel shall draft such guidance.	Within 8 weeks of receiving the issue	ResponsibleSteel Standard and Assurance Committee.
If the interpretation guidance requires technical review, it shall be presented to the ResponsibleSteel Standard and Assurance Committee for review and approval. That committee may request further information or re-drafting, may reject the proposal, or may approve the draft interpretation as presented.	Within 4 weeks of receiving the interpretation guidance from ResponsibleSteel	Steps outlined in the column 'normal' do not apply
If the draft interpretation is not approved, ResponsibleSteel shall revise it in line with the direction given by the Standard and Assurance Committee. The revised draft interpretation shall be returned to the Standard and Assurance Committee for review and approval.	Within 4 weeks of non-approval of the initial guidance	
<p>ResponsibleSteel shall publish the approved interpretation guidance on its website and shall inform all affected parties of the changes and the date the guidance becomes effective.</p> <p>ResponsibleSteel shall inform the stakeholder that raised the issue about the guidance and the implementation timelines.</p> <p>ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.</p> <p>ResponsibleSteel shall publish a summary of the issue and of the resolution outcome on the ResponsibleSteel website.</p>	Within 2 weeks of approval	Within 2 weeks of approval
<b>Supporting Documentation and References</b>		
<ul style="list-style-type: none"> <li>ResponsibleSteel Log Template</li> <li>ResponsibleSteel Standards Development Procedures (available at <a href="https://www.responsiblesteel.org/resources/">https://www.responsiblesteel.org/resources/</a>)</li> </ul>		

### 3.6. Issues raised against ResponsibleSteel personnel

Overview	
<p>ResponsibleSteel personnel are committed to work professionally and respectfully and to fully implement ResponsibleSteel policies and procedures. If this is perceived not to be the case, ResponsibleSteel shall investigate such issues. If the issue cannot be resolved to the satisfaction of the stakeholder that raised the issue, the stakeholder may raise it through an Ad-Hoc Resolution Committee.</p> <p>Personnel include ResponsibleSteel Secretariat staff, Board members, contractors, etc.</p>	
Process	
ResponsibleSteel shall capture the initial concern in its issues log.	Within 1 week of receiving the issue
The stakeholder raising the concern shall be asked, if possible, to raise and try to resolve their issue directly by discussing it with the person causing the concern. If this is not appropriate or has been tried and the outcome was not satisfactory, then the stakeholder shall be asked to contact the ResponsibleSteel Executive Director. If the concern relates to the ResponsibleSteel Executive Director, the person raising the concern may raise their issue with the Chair of the ResponsibleSteel Board or through an Ad-Hoc Resolution Committee.	
<p>The Executive Director shall discuss the concern with the personnel who is the subject of the issue raised or, where appropriate, shall delegate this to the individual's immediate supervisor. If the issue relates to a ResponsibleSteel Board member, the Executive Director shall inform the Chair of the ResponsibleSteel Board of the issue and discuss with them how best to address it.</p> <p>The Executive Director may take whatever additional action the Executive Director and, potentially, the Chair of the ResponsibleSteel Board deem appropriate to understand the basis of the concern and to try to resolve the issue, subject to Australian law and employer obligations and responsibilities.</p>	Within 6 weeks of receiving the issue
The Executive Director shall report back to the stakeholder that raised the concern as to the action that has been taken to try to resolve the issue. ResponsibleSteel shall inform the stakeholder that they may raise the issue through an Ad-Hoc Resolution Committee in case the matter is not resolved to their satisfaction.	
<p>ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.</p> <p>ResponsibleSteel shall publish a summary of the issue and of the resolution outcome on the ResponsibleSteel website.</p>	
Supporting Documentation and References	
<ul style="list-style-type: none"><li>Issues Log Template</li></ul>	



### 3.7. Other types of issues relating to the ResponsibleSteel programme

Overview
<p>Stakeholders might raise issues that do not fit into one of the categories described above. Where this is the case, the ResponsibleSteel Secretariat may propose one of the listed pathways or define another pathway for resolution.</p> <p>Issues in the 'Other' category might relate to improper use of ResponsibleSteel claims or labels and resolution might be guided by trademark law. Further examples of 'Other' issues could relate to ResponsibleSteel members.</p>

### 3.8. Ad-Hoc Resolution Committee

Overview	
<p>If none of the pathways above result in successful resolution of the issue, then the stakeholder that raised the issue may escalate it to an Ad-Hoc Resolution Committee that shall be set up by ResponsibleSteel specifically to address the issue.</p> <p>The actions taken under the Ad-Hoc Resolution Committee may or may not resolve the issue to the satisfaction of the stakeholder that raised the concern. However, the determination by the Ad-Hoc Resolution Committee shall be final and cannot be appealed.</p>	
Process	
ResponsibleSteel shall capture the concern in its issues log or, where ResponsibleSteel referred the issue to another party before, shall identify in its issues log which concern is brought back for consideration by an Ad-Hoc Resolution Committee and shall update the issues log entry to reflect actions that have been taken since the issue was first raised.	Within 4 weeks of the issue being brought to ResponsibleSteel
ResponsibleSteel shall nominate at least four potential members for the Ad-Hoc Resolution Committee. In choosing candidates, ResponsibleSteel shall ensure that they are free from conflict of interest in relation to the object of the issue (which could be a site, a certification body or ResponsibleSteel personnel). ResponsibleSteel shall propose the candidates to the stakeholder that raised the issue. The stakeholder shall be asked to choose three of them to form the Ad-Hoc Resolution Committee. ResponsibleSteel shall inform the stakeholder: <ul style="list-style-type: none"><li>• Of the Committee's review process (as below)</li><li>• That the Committee's decisions cannot be appealed</li><li>• When the stakeholder might expect an outcome of the Committee's investigation.</li></ul>	
ResponsibleSteel shall appoint the Committee members and provide them with all relevant information on the issue requiring resolution, including any documents,	

records and other information that has been gathered and reviewed during other resolution pathways and earlier resolutions that were provided but did not satisfy the complaining party.	
The Ad-Hoc Resolution Committee members shall each individually study the provided information. They shall get together by virtual or in-person means to discuss the issue and a potential resolution. The Committee shall take whatever action it deems appropriate to better understand the basis of the concern.	Within 3 - 12 weeks of the Ad-Hoc Resolution Committee receiving issue, depending on the complexity of the matter.
<p>The Ad-Hoc Resolution Committee might conclude that further action that is consistent with ResponsibleSteel policies and procedures and with the scope of the ResponsibleSteel programme could be taken to resolve the issue, or it might conclude that appropriate action to resolve the issue has been taken and that further action would be unlikely to resolve the issue.</p> <p>In cases where the Ad-Hoc Resolution Committee cannot find agreement on conclusions, it shall seek advice from qualified experts. In other cases, seeking advice from qualified experts is optional. However, such experts shall not take part in decision-making and shall not be involved in any activity that constitutes a conflict of interest.</p>	
The Ad-Hoc Resolution Committee shall prepare a written report that describes its mutually agreed conclusions and, potentially, any actions and associated timelines that shall be taken to resolve the issue. The report shall document if there was disagreement between the Committee members and how disagreement was resolved. The Ad-Hoc Resolution Committee shall submit the report to ResponsibleSteel.	
ResponsibleSteel shall review the report to confirm that any suggested actions are consistent with ResponsibleSteel policies and procedures and with the scope of the ResponsibleSteel programme. Where this is not the case, ResponsibleSteel shall provide feedback to the Committee for them to reflect in their report.	
<p>ResponsibleSteel shall submit the final report of the Ad-Hoc Resolution Committee to the party that gave rise to the issue in the first place and to the party that raised the issue.</p> <p>Where the Ad-Hoc Resolution Committee requests further action to be taken, ResponsibleSteel shall explain to the party and to the stakeholder that:</p> <ul style="list-style-type: none"> <li>• The requested actions must be satisfactorily completed before ResponsibleSteel can consider the issue to be closed</li> <li>• If the required actions are not carried out, the party risks consequences such as termination of its approval as ResponsibleSteel certification body, suspension of its certificate, or termination of its ResponsibleSteel membership.</li> </ul>	

<p>Where relevant, ResponsibleSteel shall verify that the requested actions have been satisfactorily completed. Once this is the case, ResponsibleSteel shall inform the stakeholder that raised the issue and the Ad-Hoc Resolution Committee accordingly. ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.</p> <p>ResponsibleSteel shall publish a summary of the issue and of the resolution outcome on the ResponsibleSteel website.</p>	<p>Within 2 weeks of receiving the Ad-Hoc Resolution Committee report or, where actions are requested, within 2 weeks of verifying satisfactory action completion.</p>
<b>Supporting Documentation and References</b>	
<ul style="list-style-type: none"> <li>ResponsibleSteel Issues Log Template</li> <li>Ad-Hoc Resolution Committee Terms of Reference</li> </ul>	

#### 4. ResponsibleSteel Issue Log Template

Issue Number:	
Date issue raised with ResponsibleSteel:	Name of stakeholder raising the issue:
Description of the issue:	
Analysis of issue in terms of ResponsibleSteel programme requirements:	
Description of any actions taken by the stakeholder to resolve the issue prior to it being raised with ResponsibleSteel, including parties involved in the issue:	
Pathway for resolution as agreed with the stakeholder, description of next steps:	
Outcome(s) of resolution:	
Date of ResponsibleSteel determination that the issue is considered closed:	

## 5. ResponsibleSteel Ad Hoc Resolution Committee Terms of Reference

The goal of the Ad-Hoc Resolution Committee is to provide resolution on disputed issues in relation to the ResponsibleSteel certification programme for responsible steel sites. Escalation to the Ad-Hoc Resolution Committee shall be the last resort once other pathways for resolution have been exhausted.

Committee members shall be proposed by ResponsibleSteel to the party that raised the issue requiring resolution. In identifying candidates for the Committee, ResponsibleSteel may choose members from the following parties:

- ResponsibleSteel Board (see <https://www.responsiblesteel.org/about/board-and-secretariat/>)
- ResponsibleSteel working groups (consisting of subject experts)
- ResponsibleSteel members or associate members (see <https://www.responsiblesteel.org/membership/members-and-associates>)
- Academia from fields relevant to the ResponsibleSteel programme
- Civil society (such as trade unions, human rights or environmental organisations)
- Specialists in overseeing certification bodies and working with certification programmes

The qualities that ResponsibleSteel will be seeking in Ad-Hoc Resolution Committee members shall include, but are not limited to:

- Support of the ResponsibleSteel Vision and Mission
- Extensive knowledge on the ResponsibleSteel system (or willingness to go through an ResponsibleSteel training session)
- Expertise in the area that the issue is related to
- A willingness to seek fair and balanced resolutions
- Ability to make rational decisions based on the evidence provided
- Ability to think creatively about solutions to resolve conflicts
- Demonstrated ability or willingness to work in good faith in multi-stakeholder settings

Any prospective Ad-Hoc Resolution Committee member shall disclose to ResponsibleSteel potential conflicts of interests to be considered for committee membership.

The Ad-Hoc Resolution Committee shall follow 3.8 of the ResponsibleSteel Issues Resolution System in providing resolution.