



## **Guidance on stakeholder engagement for certification bodies**

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## Introduction

This guide has been written to support certification bodies in engaging stakeholders in ResponsibleSteel audits. Stakeholder consultation is a key element in ResponsibleSteel audits and one of the features that makes them different from ISO audits. Apart from the certification client, stakeholders are the richest and most substantive source of information for a certification body. Stakeholder consultation serves to collect the information needed to conduct a robust audit. 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 earlier the certification body is aware of stakeholder concerns, conflicting perspectives and potential controversies, the better the audit and consultation process can be planned. Having clarity about consultation needs will also enable the certification body to better calculate the audit costs - something the certification client will certainly appreciate.

A stakeholder is "a person or organisation that can affect, be affected by, or perceive itself to be affected by a decision or activity of a site" (Adopted from ISO 14001:2015(en) Environmental management systems Requirements with guidance for use).

In the context of steel sites, the following parties shall be considered key stakeholders where they are present or operating in the site's area of influence:

- Local communities and their formal and informal representatives, including indigenous peoples
- National or local government authorities
- Politicians
- Labour unions
- Marginalised groups
- Religious leaders
- Civil society organisations (operating at local, regional and global level)
- Academics

Stakeholders also include suppliers, contractors, distributors and customers, as well as workers and contractors. However, the ResponsibleSteel Standard focuses on stakeholders that do not hold a business or contractual relationship with sites. For this reason, this guidance document has been written with the stakeholder groups in mind that are listed above. Note that workers are extensively covered in the Occupational Health and Safety and the Labour Rights Principle of the ResponsibleSteel Standard and that auditors must interview workers during the stage 2 audit.

This guidance document:

- summarises important principles of good stakeholder engagement
- contains a template that certification bodies may use to reach out to stakeholders to announce the audit
- contains a generic questionnaire that may be amended by certification bodies to interview stakeholders.

This guidance document will be reviewed from time to time as we gain experience with ResponsibleSteel audits. We recommend that you check <https://www.responsiblesteel.org/certification/> before every audit to make sure you have the most up to date version.

Other documents relevant for stakeholder engagement are:

- 'Introduction to ResponsibleSteel for stakeholders' that explains how they can provide input to site audits
- Guidance on worker interviews (as 'internal' stakeholders).

These documents can be found on <https://www.responsiblesteel.org/certification/>.

## Principles of good stakeholder engagement

The effort required for successful and meaningful stakeholder consultation will vary depending on several factors.

The most important ones are:

- Scale, scope, and complexity of the client's site and its impacts, and the resulting likely number and range of potentially interested stakeholders
- The past and current level and nature of a conflict and the potential for controversy around the site or certification client in the future
- The ability and/or willingness of key stakeholders to engage constructively in the audit process.

Certification bodies should note that there are a number of reasons why stakeholders might show a lack of willingness to engage in the audit process. It is very important to discover what the reasons might be. Among them are:

- They believe the site is fine. In this case, the certification body should get confirmation (in writing, if at all

possible) that this is what they think

- They don't know enough about the process and don't have the time, resources, or expertise to get informed and provide quality input. In this case, it could be helpful to ask what other group might be more involved or help them get up to speed with the process
- They cannot read English well enough to appreciate what is being requested. In that case, the certification body should consider translation of relevant documents
- The wrong person at an organisation was contacted. If so, the certification body should go back and find the right person to engage
- They don't want to go on record. In this case, the certification body should explain that they will not attribute comments or concerns
- They don't trust the certification body, ResponsibleSteel, or don't like the idea of certification. IN this case, it would be helpful if the certification body could find out why that is and liaise with ResponsibleSteel to try and address the issue
- ResponsibleSteel certification might undermine current vested interests (e.g. a particular campaign, law suit, or related action).

As a general rule, reluctance by key stakeholders to engage should result in more intensive outreach by the certification body.

Certification bodies must actively seek input from stakeholders and should allot sufficient time for their engagement. An unrealistic timeframe will lead to frustrated and disenfranchised stakeholders, poor stakeholder input, and erosion of the audit's credibility. It takes time to contact stakeholders and to arrange and conduct consultation. Where there is confusion about provided input or conflicting information, follow-up needs to happen to meet both certification body and stakeholder needs. Additional key stakeholders may be identified as the process unfolds and will need to be consulted. Some stakeholder groups have limited resources and may not be able to respond quickly. Or certification bodies might need to adjust meeting times or locations to suit stakeholder schedules.

Transparency is key. Certification bodies should communicate regularly and clearly with stakeholders and should be responsive to stakeholder questions. To avoid uncertainty and confusion, certification bodies should communicate:

- Where they are in the audit process
- What they are going to do to engage stakeholders
- What they are going to do with stakeholder input
- Which issues and concerns were raised during the process
- How these were addressed by the certification body.

Methods, behaviours, languages, terminology, technology and formats used for consultation should be appropriate, also from a cultural perspective. Examples include:

- In some cultures, it is disrespectful to look directly into a person's eyes
- There may be stakeholders that are not literate and need information conveyed in a form other than written (e.g. phone, video, audio);
- Some stakeholders may prefer to receive information verbally;
- Some stakeholders may not have reliable access to the internet or computers, and will need written information in hard copy, for example signage in village shops, at the church, or in the central square.

When consulting with stakeholders, a safe environment is needed for honest and open exchange of information, perspectives and concerns. Some stakeholders may prefer to be interviewed individually rather than in a group. Stakeholders should be assured that any reference to or characterisation of their input (written or verbal) will be done without attribution. Stakeholders should be encouraged to be open and transparent in providing objective and verifiable information that may have a bearing on the site's audit. Interactions with stakeholders should always be respectful, unbiased, and non-judgmental to create trust in both the certification body, the audit team, and the ResponsibleSteel programme.

For successful consultation, it is also important that the individual(s) leading consultation interviews is (are) experienced in engaging stakeholders and has (have) appropriate expertise. At least two audit team members should participate in the interviews to make sure that minutes are accurate. If audit teams feel they need support from a stakeholder engagement specialist, they may ask a neutral expert to assist with the consultation process. If a highly technical issue is discussed with stakeholders, the present audit team member(s) should possess relevant expertise. In addition, careful preparation will ensure that the consultation interviews truly benefit the assessment. A generic stakeholder interview questionnaire can be found below. It may be used and adapted by certification bodies to suit the respective audit, site and certification client.

When consulting with stakeholders, certification bodies should carefully assess all their inputs by asking themselves whether the raised issues and concerns have substantive standing and are relevant to the ResponsibleSteel Standard. The following answers are possible:

1. The issue/concern is substantive but is not relevant to any ResponsibleSteel Standard requirements. In this case, it will be important to articulate the rationale for declaring the issue/concern 'not relevant' to demonstrate to stakeholders that they were heard and why their input was 'rejected'.

2. The issue/concern is substantive and is relevant to ResponsibleSteel Standard requirements. The certification body needs to identify to which requirement(s) the concern applies and adequately reflect it in the assessment of the site.
3. The issue/concern does not have substantive standing, nor is it directly relevant to ResponsibleSteel Standard requirements. The issue/concern may be a result of history, relationships, dissatisfaction with process, politics, etc. This is a difficult and delicate judgement to make, and should be considered very carefully. The certification body should clearly and objectively articulate their rationale for 'rejecting' the issue/concern in the audit reports.

## Template to reach out to stakeholders

The below is a generic template that certification bodies may use to reach out to stakeholders and get them interested in providing input to the audit. The template has been drafted for written communication. However, it may also be used as a guide for an introductory phone conversation. Phrases highlighted in yellow must be amended depending on the respective stakeholder, certification body and audited site. Note that ResponsibleSteel will make upcoming stage 2 audits known on <https://www.responsiblesteel.org/certification/audits>.

Dear (add name of stakeholder)

I am writing to you today to inform you of the planned ResponsibleSteel audit of the site (add name of site) in (add municipality), with the physical address at (add street and number). The site belongs to the company (add name of parent company). ResponsibleSteel is a new voluntary initiative that has defined a Standard for the responsible sourcing and production of steel. The standard is very broad and covers important social and environmental issues such as labour rights, communities, greenhouse gases and air emissions. The site has applied to be assessed against that Standard. The role of my organisation, (add name of certification body), is to establish whether the site meets the Standard.

The ResponsibleSteel programme gives anyone the opportunity to provide input to the site's assessment who is either affected by the activities of the site or who otherwise has an interest in the site. You have (or Your organisation has) been identified to be such a "stakeholder" of the site. You can provide input to the assessment by submitting documents or data related to the site and/or by participating in an interview. If you are willing to do an interview, we could speak either in person, by phone or virtually, sometime between xx and xx (add dates). If you want to submit documents or data only, please do so by xx (add date) using email, mail or fax (amend if needed).

Stakeholder input to ResponsibleSteel audits is immensely important to get a balanced and comprehensive picture of the site and how it lives up to the ResponsibleSteel Standard. I would therefore be very pleased to hear from you and to receive input from you. Further information about ResponsibleSteel audits and how you can get engaged can be found in the attached short leaflet. Of course, I am also available for any questions about the audit or its aims. You may write to me or phone me using the contact details below.

If you want to find out more, please visit:

- For the steel site: (add weblink to site, if one exists, or to parent company) to learn about the steel site this audit is about
- For ResponsibleSteel: <https://www.responsiblesteel.org/>
- For my organisation: (add weblink).

Kind regards

add full name

add email address

add organisation

add role

add phone number including country code, if relevant

add Skype, etc (if relevant)

## Generic stakeholder interview questionnaire

The questionnaire below is of generic nature. Certification bodies may use it as a template that they adapt to the specific stakeholder(s) that will be interviewed and/or to specific issues or concerns that have been raised and need further analysis and investigation. *Phrases in italics* are meant to help the audit team conduct the interview.

### General information:

Name of person(s) interviewed:

Organisation:

Stakeholder category: (*civil society organisation, government authority, academic, community, etc.*)

Date of Interview:

Mode of Interview: (*in-person meeting, phone, written (email, fax, mail)*)

Name of interviewer(s):

Name of other attendee(s) (if applicable): (*labour union representative, etc.*)

Name of translator and affiliation (if applicable):

**Questions:**

1. Introduction (*Introduce self/organisation. Review proposed consultation process, including certification body role, purpose of consultation, what will be done with information provided, reminder of no attribution, etc. Ask if any questions about the process. Finally, point out that you will be taking notes and that they are for your own use and that of the audit team, to help when it comes to writing up the audit report and might be used to inform classification of site performance during the audit*)
2. What is the nature of your (your organisation's) interest in the client (past, current, anticipated)?
3. What, if any, specific substantive issues or concerns do you have regarding the client? (*First, solicit answers without prompting. If no specific issues or concerns or as an addition, walk through the key areas of the ResponsibleSteel Standard and specifically request any issues and concerns on each*)
4. For each issue of concern noted, do you have recommendations for how they can be addressed? If so, what are they? If not, do you know of anyone else who does?
5. For each issue of concern, what or who is (are) the best source(s) of data or evidence to support your (your organisation's) position? (*Explain that, ideally, sources should be peer reviewed published information*)
6. Are there other sources of information or data that you know of, consistent or not with your position? (e.g. data others may be using to counter your position or to support a conflicting position?)
7. Who do you believe are the most credible experts regarding this site and regarding the issues important to you?
8. What other individuals or organisations are actively interested in this site or the issues of concern to you? Please name those in support of your position and those taking a different position.
9. What other individuals or organisations would you recommend that we consult in our efforts to get as much information as possible for the assessment of this client?
10. Would you like time to consult with others in your organisation, or other like-minded organisations to ensure that we have the full input of your organisation and its constituents or partners? If so, how much time do you think you need, and can we schedule a follow-up meeting or call to discuss any additional input you would like to provide? (*If not, note the timeline, mechanism, and contact information for further input if something else comes up.*)
11. Let me summarise the key points that I have understood you to make in this interview thus far. (*Summarise the key points of the input received from this interview to check for accuracy and to demonstrate that you have been listening carefully.*)



12. It would be extremely useful if you (your organisation) could put your concerns in writing for consideration by the audit team. Would you (your organisation) be willing to do this? If so, when can we expect to receive it (*review the timeline and relevant milestones*)? If not, do you feel confident that I have captured your input (based on the verbal summary above), or, if I summarise my notes in writing and send them to you, would you be willing to review them for completeness and accuracy?
13. *Briefly highlight key points of opportunity for stakeholder input and expected timing of the process.*
14. Do you have any questions? If any questions or additional concerns come to you after we have completed this interview, please contact us and let us know (*again, review timeline and any deadlines*).
15. If we have additional questions as the audit proceeds, may I contact you again with specific questions?
16. Thank you very much for your time and effort.

*Source: Adapted from MSC (Fishery Process Annex GPX - Guidance to CABs on Stakeholder Consultation – Informative)*