



## **Issues Resolution System**

Version 2.0

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## Version history

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Version 1.0	29 December 2019	Approved by the Board of Directors for publication as part of the Assurance Manual
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## 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 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.

It is a condition of ResponsibleSteel membership that ResponsibleSteel Members and Associate Members agree to participate in good faith in the ResponsibleSteel Issues Resolution System in order to resolve issues raised by them or relating to their own conformity with ResponsibleSteel standards, policies, procedures, bylaws or other rules.

## 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:

1. **Step 1: Initial discussion of the issue with ResponsibleSteel.**
2. **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).

3. **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

Stakeholders may contact ResponsibleSteel about an issue via email, which is our preferred method of communication. If email is not possible, stakeholders may send a letter using the following contact details:

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

Mail: PKF Newcastle Pty Limited (ResponsibleSteel company secretary)

PO Box 2368

Dangar, NSW, Australia

2309

The ResponsibleSteel Secretariat may also implement the issues resolution pathways when stakeholders bring issues to its attention through other channels.

## 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

The ResponsibleSteel Secretariat aims to advise and support stakeholders raising issues for resolution, but stakeholders may also appoint their own representatives or advisers to accompany them in raising their issue with us. The official language of ResponsibleSteel is English. We will aim to be supportive where stakeholders want to raise an issue with ResponsibleSteel, but do not have sufficient knowledge of English. However, we cannot commit



to providing interpretation or translation. 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. ResponsibleSteel's ability to resolve an issue may be limited where a stakeholder's identity cannot be revealed to other parties.

### **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.

Retributions or reprisals against stakeholders raising issues in relation to the ResponsibleSteel programme are not acceptable. ResponsibleSteel reserves the right to take action against any party considered to have carried out such retribution or reprisal against someone raising an issue for resolution with ResponsibleSteel.

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

Any individual involved in the investigation or decision-making on an issue shall declare any actual or potential conflict of interest they may have or may be perceived to have in the proceedings. ResponsibleSteel shall keep a written record of the declaration and propose what action it considers is appropriate to address the potential conflict. The proposed action will be reviewed by the ResponsibleSteel Membership and Governance Committee which shall make a final determination. 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**

ResponsibleSteel reserves the right to reject an issue for further consideration under these procedures on the grounds that:

- 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 relates to aspects that are not addressed by the ResponsibleSteel standards, policies, procedures, bylaws or other documented rules or requirements.

### **1.9. Ceasing resolution**

ResponsibleSteel reserves the right to cease its attempts to find resolution if in its sole opinion the stakeholder that raised the issue is not making a good faith effort to resolve the issue through participation 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**

A summary 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 or letter 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 (note paragraph 1.5 above in relation to confidentiality)
- 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 in relation to 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.
	<p><b>Resolution pathway:</b> Site → certification body → ResponsibleSteel → Ad-Hoc Resolution Committee</p> <p>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.</p>
	Examples may include, but are not limited to: complaints <sup>1</sup> against audit findings (e.g., failure to raise a nonconformity, incorrectly raising a non-conformity,

<sup>1</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).



Type of Issue	Description
2. Issues related to actions / inactions of a certification body	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>2</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
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

<sup>2</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
6. Issues raised against ResponsibleSteel personnel	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.  Personnel shall include ResponsibleSteel Secretariat staff, Board members, contractors, etc.
	<b>Resolution pathway:</b> ResponsibleSteel personnel → ResponsibleSteel Executive Director → Ad-Hoc Resolution Committee
7. Other types of issues relating to the ResponsibleSteel programme	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.  Examples of 'other' types of issues may include, but are not limited to, improper use of claims or labels; complaints related to ResponsibleSteel members.  ResponsibleSteel reserves the right to reject an issue from consideration if it does not pertain to ResponsibleSteel standards, policies, procedures or other documented rules or requirements (see paragraph 1.8 above).
	Resolution depending on the issue brought forward

Once an 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 Associate Members (see <https://www.responsiblesteel.org/membership/members-and-associates/>)



- ResponsibleSteel Assurance Panel Members
- 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.

ResponsibleSteel aims to minimise the costs of issues resolution for all parties. 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. All costs to be covered by ResponsibleSteel must be agreed to by the Executive Director in writing and in advance of being incurred. 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

<b>Overview</b>	
<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>	
<b>Process</b>	
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>	
<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 pathway on the ResponsibleSteel website.</p>	
<p><b>Supporting documentation and references</b></p>	
<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

<p><b>Overview</b></p>
<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.</p> <p>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</p>

consideration of the issue. ResponsibleSteel shall identify an appropriate resolution pathway, which might be resolution through an Ad-Hoc Resolution Committee.	
<b>Process</b>	
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
<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 9.8 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>	
Process	
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

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 9.7 Appeals)</li> <li>ResponsibleSteel Standard</li> </ul>

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

Overview		
<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> <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.</p>		
Process	Normal	Expedited
ResponsibleSteel shall capture the initial concern in its issues log.	Within 2 weeks of receiving the issue	Within a maximum of 1 week 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
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		



<p>has been done and shall publish a summary of the issue and of the resolution outcome on the ResponsibleSteel website.</p>		<p>Assurance Committee.</p>
<p>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.</p>	<p>Within 4 weeks of receiving the issue</p>	<p>Steps outlined in the column 'normal' do not apply</p>
<p>ResponsibleSteel shall seek Board approval of the changes and timelines.</p>	<p>Within 8 weeks of the decision of the ResponsibleSteel Board subcommittee</p>	
<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>	<p>Within 2 weeks of approval</p>	
<p><b>Supporting Documentation and References</b></p>		
<ul style="list-style-type: none"> <li>• ResponsibleSteel Issues Log Template</li> <li>• ResponsibleSteel policies and procedures</li> </ul>		

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

Overview		
<p>Depending on the issue brought forward, clarification on the ResponsibleSteel Standard or guidance on how to interpret the ResponsibleSteel Standard may be needed.</p> <p>A clarification is an explanation of the correct meaning of a requirement of the ResponsibleSteel Standard, where the correct meaning is clear from existing guidance, context or other sources of information. Clarifications may be provided by the Technical Director or the Executive Director.</p> <p>An interpretation provides guidance on the application of a Standard Requirement where the correct meaning is not clear from existing guidance, context or other sources of information.</p> <p>Questions on interpretation of ResponsibleSteel Standard Requirements may come in during site audits. Where this is the case, certification bodies, audited sites or stakeholders engaged in the audit may classify them as 'urgent' to expedite the process for developing provisional interpretation guidance and to not hold up the audit. Provisional interpretation guidance is subject to stakeholder consultation for finalisation. The same goes for interpretation questions that are not marked as urgent. Both pathways for providing interpretation guidance are outlined below and are described in more detail in the Standard Development Procedures.</p>		
Process	Normal	Expedited
ResponsibleSteel shall capture the initial concern in its issues log.	Within 1 week of receiving the issue	Within a maximum of 1 week of receiving an interpretation issue marked as 'urgent',
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 provide provisional interpretation guidance.
ResponsibleSteel shall prepare a consultation paper which includes at least the following: <ul style="list-style-type: none"> <li>a. Explanation of the issue for interpretation;</li> <li>b. Considerations;</li> <li>c. The provisional interpretation;</li> <li>d. An explanation of the provisional interpretation;</li> <li>e. The consultation process to finalise the interpretation, including timeline and opportunities for stakeholders to contribute;</li> <li>f. The decision-making process – including how decisions are made and by whom, in accordance with 11.10 and 11.11 of the Standard Development Procedures (copied below).</li> </ul>	Between 1 and 4 weeks of receiving the issue	ResponsibleSteel may consult with stakeholders including ResponsibleSteel members, members of the Board of

<p>Interpretations shall be subject to a minimum consultation period of 30 days. ResponsibleSteel shall carry out consultations on a quarterly schedule. ResponsibleSteel shall inform ResponsibleSteel members, certification bodies, certification applicants and certificate holders of the consultation and shall make the consultation paper publicly available on the ResponsibleSteel website.</p>	<p>On a quarterly basis</p>	<p>Directors and/or relevant experts at its discretion. Steps outlined in the column 'normal' do not apply. However, provisional interpretation guidance shall be finalised as outlined in the Standard Development Procedures.</p>
<p>ResponsibleSteel shall prepare a summary of input received and the proposed final interpretation for decision by the Standards and Assurance Committee.</p>	<p>Standards and Assurance Committee decision within 4 weeks of receiving stakeholder input</p>	
<p>Where an interpretation is approved, it shall come into immediate effect and shall be communicated to ResponsibleSteel members, certification bodies, certification applicants, certificate holders and members of the ResponsibleSteel Assurance Panel, and be announced on the ResponsibleSteel website.</p> <p>NOTE: certificates issued correctly on the basis of a provisional interpretation shall remain valid for their normal remaining duration. Certificate holders would be required to comply with the finalised interpretation in order for a certificate to be re-issued following its next audit.</p>	<p>Within 1 week of Standards and Assurance Committee decision</p>	
<p>ResponsibleSteel shall complete its issues log to capture what has been done and shall consider the issue to be closed.</p>	<p>Within 1 week of approval</p>	<p>Within 1 week of issuing the provisional interpretation</p>
<p><b>Supporting Documentation and References</b></p>		
<ul style="list-style-type: none"> <li>ResponsibleSteel Issues 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

<b>Overview</b>	
<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>	
<b>Process</b>	
ResponsibleSteel shall capture the initial concern in its issues log.	Within 1 week of receiving the issue
<p>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>	
<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
<p>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>	
<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

- Issues Log Template

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

#### Overview

Stakeholders might raise issues that are not listed in the above. If such an issue is brought forward, ResponsibleSteel may propose one of the listed pathways or define another pathway for resolution. ResponsibleSteel reserves the right to reject an issue from consideration if it does not pertain to ResponsibleSteel standards, policies, procedures or other documented rules or requirements (see paragraph 1.8 above).

### 3.8. Ad-Hoc Resolution Committee

#### Overview

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.

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.

#### 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.

ResponsibleSteel shall nominate at three 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 inform the stakeholder:

- Of the Committee's review process (as below)
- That the Committee's decisions cannot be appealed
- When the stakeholder might expect an outcome of the Committee's investigation.

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

Within 4 weeks of the issue being brought to ResponsibleSteel

<p>pathways and earlier resolutions that were provided but did not satisfy the complaining party.</p>	
<p>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.</p>	
<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>	
<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.</p>	
<p>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>	
<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>Within 3 - 12 weeks of the Ad-Hoc Resolution Committee receiving issue, depending on the complexity of the matter.</p>

<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>
<p><b>Supporting Documentation and References</b></p>	
<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>)
- ResponsibleSteel Assurance Panel Members
- 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.