**FINNISH TOWARDS SUSTAINABLE MINING (TSM) STANDARD**

**ASSESSMENT PROTOCOL**

**A Tool for Assessing Community Outreach Performance**

**Introduction**

This document provides a tool for assisting companies in the facility-level assessment of their current standard of community outreach. The level of community outreach performance is monitored using four performance indicators in accordance with this assessment tool. It enables key performance indicators to be segregated, and performance improvements for each indicator to be tracked from year to year. The use of this protocol also enhances the consistency of community outreach performance assessments conducted across companies. In addition, the tool has been designed to enable the external verification of company performance.

*The assessment protocol also includes special notes relating to the Sámi and reindeer husbandry. We recommend that companies abide by the points made in the notes if 1) the facility is located in the reindeer herding area or the Sámi Homeland or 2) the impacts of the facility may extend to the Sámi Homeland or are of considerable significance to the rights of the Sámi as an indigenous population. The special notes relating to the Sámi and reindeer husbandry are given in italics in this protocol.*

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# Assessing Community Outreach Implementation

The purpose of the assessment protocol is to provide guidance – based on performance indicators – to the companies in their planning and implementation of community outreach activities.

The assessment should:

* assist companies in developing their capacity to monitor and improve their performance
* provide a basis for the related auditing.

Professional judgement is required when assessing the management system. The application of the assessment protocol of the Finnish TSM standard requires that the assessor have sufficient expertise in the practice of community outreach and management systems assessment. When carrying out an assessment, account must be taken of cooperation between the employer and employees. The assessment protocol of the Finnish TSM standard is not, in itself, a guarantee of the effectiveness of community outreach activities, but can be used to measure performance levels. A self-assessment checklist is attached to the document (Appendix 2).

**Performance Indicators**

Four performance indicators have been established for community outreach management:

* 1. Community of interest (COI) identification
  2. Effective COI engagement and dialogue
  3. COI response mechanism
  4. Reporting

Five levels of performance are identified for each indicator. Assessment criteria are used to further define performance at each level. The assessor must evaluate whether the company or the performance of the site/facility meets the assessment criteria for the performance indicators, by answering the questions presented in the self-assessment checklist. A base assumption is made that all companies are in compliance with all legal and regulatory requirements.

Specific assessment criteria for each performance indicator are provided in subsequent tables, to enable the assessor to determine an appropriate level of performance (Levels C-AAA). The performance level is determined by the fulfilment of the requirements of the criteria.

Wherever a performance element or performance indicator is irrelevant, the assessment given should be N/A. For each indicator, only one level can be reached, which is determined by the lowest level that meets the requirements. All criteria at that level and below must be met. The overall level of the Biodiversity Conservation Management is determined by the lowest level achieved.

**The goal of each company is to achieve an “A” ranking at a minimum and to work towards continuous improvement.**

**Facility-level Assessments**

Companies are expected to complete an assessment and report on the performance indicators for community outreach for each distinct site or facility. When planning the assessment, account must be taken of the organisational structure of mining operators, as companies may categorise their facilities and define their sites in various ways. This assessment protocol focuses on companies operating in Finland and their facilities and sites, in particular.

Facility-level reporting has been found to be the most reliable, informative and useful approach to performance evaluation.

**Assessment Process**

It is recommended that the assessment include interviews, discussions and document reviews. The assessment must include the management, as well as production and specialist personnel representing the site or facility. A level of expertise in auditing and management systems assessment, and some knowledge and experience of community outreach is required. For each performance indicator, only one level can be reached if all criteria for that level and all preceding levels have been met. No partial levels of performance (e.g. B+) can be reported.

Where an operation is shared between two parties, e.g. a joint venture, the two parties are encouraged to discuss who should complete the assessment, and whether it should be undertaken jointly or divided up so that the results reflect the appropriate activities of each company.

**Structure of the Assessment Protocol**

For each performance indicator, the protocol provides:

* a statement of purpose that expresses the spirit and intent of the indicator
* assessment criteria for each level of performance (C-AAA)
* supporting guidelines to help the assessor understand the general scope of each indicator and to act as a framework for reviewing documentation and conducting interviews necessary for the assessment of the company’s or facility’s performance
* Frequently Asked Questions (FAQs) that provide further information, such as definitions of key terms and answers to more commonly asked questions.

**PERFORMANCE INDICATOR 1**

**COMMUNITY OF INTEREST IDENTIFICATION[[1]](#footnote-1)**

**Purpose:**

To confirm that the company and/or operation has been able to identify communities of interest

* affected or
* perceived to be affected by its operations or
* who have a genuine interest in the performance and activities of the company and/or operation.

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| **Performance Indicator 1**  **Community of Interest (COI) Identification**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | Not all local or direct COIs have been identified.  *The Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned have been identified as COIs if 1) the facility is located in the reindeer herding area or the Sámi Homeland or 2) the impacts of the facility may extend to the Sámi Homeland or are of considerable significance to the rights of the Sámi as an indigenous population.* |
| **B** | Plans are in place to develop a formal system for identifying COIs. Some COIs have been identified, but not all. |
| **A** | All local and direct COIs have been identified. The identified COIs themselves appoint their representatives for the dialogue.  The social and societal impacts of the project have been assessed in advance and specified for each COI.  A formal and documented system is in place for COI identification at the local or site level, including those with challenging interests.  Communications are open and reporting is public.  *The Sámi Parliament, the village meeting of the Skolt Sámi and the reindeer herding co-operatives concerned appoint their own representatives, and appropriate and sufficient time is allocated for this process.* |
| **AA** | Site management set the targets for COI cooperation and review them annually.  The formal and documented system in place for the identification of COIs at the site includes COIs whose interest in the project may be indirect and issue-based (e.g., regional and national NGOs).  All regional and national COIs have been identified. |
| **AAA** | The COIs themselves are invited to provide regular input to the identification of COIs to ensure that consideration is given to a broad range of interests. |

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| **Community of Interest (COI) Identification**  **FREQUENTLY ASKED QUESTIONS** | | |
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| **Community of Interest (COI) Identification**  **SUPPORTING GUIDELINES FOR THE ASSESSOR**  Through interviews and the review of documentation, clarify the following issues:   * Communities of interest (COI) have been systematically identified and documented. * There is a formal system for identifying COIs. * There is an interactive process that involves COIs in identifying other groups or communities that should be considered COIs for the purposes of inclusion in interaction. * The process for identifying COIs explicitly considers a range of COIs, including those with challenging interests or that may have voiced concerns regarding the operation. * The COIs themselves can appoint their representatives for the dialogue with the company. * The process for identifying COIs goes beyond local COIs to consider whether there are other COIs which may have a less direct and/or issue-specific interest in the site. * The social and societal impacts of the project have been assessed in advance and specified for each COI. * *The Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned have been identified as COIs if 1) the facility is located in the reindeer herding area or the Sámi Homeland or 2) the impacts of the facility may extend to the Sámi Homeland or are of considerable significance to the rights of the Sámi as an indigenous population.* * *Documents have been reviewed and research has been completed, and the results obtained have been documented in order to identify a) traditional land and water areas used by the Sámi and their rights based on agreements potentially affected by the project, b) on-going conventional use of nature (for reindeer herding, hunting, fishing, gathering and handicrafts) and c) the cultural heritage and the significance of the area for the Sámi culture in the area affected by the project.* |

**PERFORMANCE INDICATOR 2**

**EFFECTIVE COI ENGAGEMENT AND DIALOGUE**

**Purpose:**

To confirm that processes have been established for communication with COIs to understand their viewpoint, to transparently inform them of company activities and performance, to actively engage them in dialogue and participation on issues of concern to them, and to identify how issues may be addressed through measures such as mitigation, compensation, or other actions[[2]](#footnote-2).

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| **Performance Indicator 2**  **Effective COI Engagement and Dialogue**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | Communications with COIs are solely based on consultation required by legislation.   * Apart from the consultation procedures, the facility has no formal engagement and dialogue processes. * Not all key COIs are consulted or engaged. * Communications are typically one way only.   Only the time required by legislation has been reserved for the processes, and thus the COIs may not have the time needed to discuss issues sufficiently. |
| **B** | * Informal engagement processes are in place, and occasional dialogue occurs with COIs. * The facility has prepared a communications and interaction plan. * There are plans to develop formal COI engagement systems, but they have not been implemented.   *Free, prior and informed consent has been obtained from the Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned for operations to be carried out in the Sámi Homeland and/or the impacts of which can extend to the Sámi Homeland and/or that have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods. In addition, the Akwé: Kon Guidelines are complied with in the Sámi Homeland. Their application is communicated openly and reported publicly.* |

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| **A** | Documented COI engagement and dialogue systems are in place.   * The facility provides assistance to ensure that COIs are able to participate in engagement and dialogue processes and to form their own view of the company’s operations, where appropriate. * Communications are written in the local language for COIs (as required) and are written in language that is clear and understandable to them. * The communications and interaction plan has been implemented. Communications and dialogue are proactive and two-way. Dialogue is carried out in a timely manner and in a spirit of mutual respect in accordance with cultural conventions. * Communications are open, and reporting is public. * Time is built into processes to allow for the meaningful review of proposals by COIs. COIs can discuss proposals and form their view on them on the basis of sufficient information provided in advance. * The company has designated an employee who acts as a contact person between the company and COIs. * Cooperation group(s) have been established to ensure effective engagement. * *The Sámi Language Act is complied with in communications, where applicable, if operations are carried out in the Sámi Homeland or the impacts of operations can extend to the Sámi Homeland or operations have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods.* * *Designated employees have been informed of meeting requirements that have been set for the consultation of representatives of the Sámi and reindeer herders[[3]](#footnote-3) and transferred to the company by central government. In addition, designated employees have been trained in the matter.* * *In order to facilitate participation by the relevant representatives of the Sámi and reindeer herders, the facility asks them to choose local experts from among themselves and offers them opportunities to participate in the process at the earliest possible stage.* * *Traditional Sámi knowledge and practices are applied in support of decision-making with a view to respecting, preserving, protecting and maintaining Sámi traditions.* |
| **AA** | COIs’ input into decisions that affect them is actively encouraged   * Processes exist to identify the needs of COIs for capacity building, in order to allow COIs to engage in effective participation on issues of interest or concern to them. * Accountability for COI engagement and dialogue rests with senior management. * Senior management reviews engagement and interaction systems and processes annually. * Company assess the need for engagement and interaction training for designated employees, including the appropriate culturally specific training. * *Consultation protocols jointly established by the Sámi, reindeer herding co-operatives and the company are followed or integrated into company consultation procedures to the extent possible.*   Cooperation group(s) meet regularly and their work is systematic. |
| **AAA** | Formal mechanisms or agreements with COIs are in place to ensure that they can effectively participate in issues and influence decisions that may interest or affect them.   * The facility has a consistent history of meaningful cooperation and dialogue with COIs. * Formal processes exist for building the capacity of COIs to allow them to participate effectively in dialogue. * Annual feedback is collected from COIs in order to develop community outreach activities. * COIs contribute to periodic reviews of engagement processes in order to enable continual improvement. * Cooperation group(s) concretely participate in the planning and development of operations. * Negotiated agreements with COIs are in place with respect to operations or projects, where appropriate. |

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| **Effective COI Engagement and Dialogue**  **FREQUENTLY ASKED QUESTIONS** | | |
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| **Effective COI Engagement and Dialogue**  **SUPPORTING GUIDELINES FOR THE ASSESSOR**  Through interviews and the review of documentation, clarify the following issues:   * COIs are regularly engaged. * The outcomes of the dialogues are documented. * Assistance and resources are provided to COIs, as appropriate, in order to allow them to participate effectively in dialogue. * Communications with COIs are clear, understandable and occur sufficiently early to enable meaningful dialogue and discussion. * Communications are written in the local language for COIs. * Accountabilities for COI dialogue within the company/facility are defined and documented. * Communications and dialogue are proactive and two-way. * A communications and interaction plan has been prepared, and has been implemented. * COIs participate in decisions that may interest or affect them. * The company has a designated employee who acts as a contact person between the company and COIs. * Feedback is regularly collected from COIs in order to develop dialogue. * The COI engagement and dialogue process is regularly reviewed to ensure that it remains effective. * Responsibility for the process review is established, including receiving reports on outcomes. * There are processes for assisting COIs in developing their skills in effective dialogue. * Cooperation group(s) have been established – also determine how they work. * Cooperation group(s) concretely participate in the planning and development of operations. * Where appropriate, negotiated agreements with COIs are in place for operations or projects. * *Traditional knowledge is sought, as appropriate, from local communities and the Sámi and is applied in support of decisions and to inform practices, including environmental monitoring.* * *Prior, informed consent has been obtained from the Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned, in the case of operations performed in the Sámi Homeland and/or the impacts of which can extend to the Sámi Homeland and/or that have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods.* * *Employees involved in Sámi and reindeer herding co-operative community outreach, or in Sámi and reindeer herding co-operative consultation, receive training on engagement and dialogue, including the appropriate culturally specific training. Traditional Sámi knowledge and practices are used in support of decision-making with a view to respecting, preserving, protecting and maintaining Sámi traditions.* | | |

**PERFORMANCE INDICATOR 3**

**COI RESPONSE MECHANISM**

**Purpose:**

To confirm that procedures have been jointly agreed with COIs to register their concerns, interests and views and ensure that these are effectively responded to.

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| **Performance Indicator 3**  **COI Response Mechanism**  **ASSESSMENT CRITERIA** | | | |
| **Level** | **Criteria** | | |
| **C** | Minimal effort has been made to understand or incorporate COI concerns or consultation requirements.   * There are no systems for tracking or responding to COI concerns. | | |
| **B** | The company has incomplete knowledge of COI concerns or consultation requirements.   * The company gives occasional consideration to COI concerns, mainly based on assumptions and sporadic consultations. * An informal complaint and response system exists. * Plans exist to develop a formal complaint and response system. | | |
| **A** | The operator has a good understanding of COI concerns and consultation requirements, and documents them.   * A formal and established complaint and response system is in place with processes for follow-up and tracking. * An employee responsible for collecting and responding to COI input has been designated. * The facility analyses and acts on the input received from COIs. The operator prepares a response to the input, concerns and views received from COIs. The operator agrees together with the COI concerned on any action required by the input. * Communications are open and reporting is public. * COI feedback is taken into account in decision making | | |
| **AA** | The operator has thorough, documented knowledge of COI issues, concerns and consultation requirements.   * Senior management considers the results of the engagement and dialogue processes at least annually, in order to determine whether and how to act upon them. * Sufficient time is built into site processes for considering and responding to COI concerns, before specific plans are implemented by the company. * Feedback collected within cooperation group(s) is applied in the operator’s activities. | | |
| **AAA** | The operator collaborates with COIs in order to establish and achieve common objectives.   * Collaboration extends to addressing common community goals. * Feedback collected in a goal-oriented manner within cooperation group(s) is applied in the operator’s activities. * Cooperation group(s) are offered the opportunity to participate in the planning and development of operations. | | |
| **COI Response Mechanism**  **FREQUENTLY ASKED QUESTIONS** | | | | | |
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| **COI Response Mechanism**  **SUPPORTING GUIDELINES FOR THE ASSESSOR**  Through interviews and the review of documentation, clarify the following issues:   * Formal systems are in place for understanding, tracking and responding to COI concerns. * The facility has thorough, documented knowledge of COI issues, concerns and consultation requirements. * An employee responsible for collecting and responding to COI input has been designated. * Senior management regularly reviews dialogue processes to ensure that they remain effective, and the management is responsive to concerns. * COIs are consulted in a timely manner and in a spirit of mutual respect, in accordance with the appropriate cultural conventions. * The company takes the concerns and comments of COIs into account before making decisions. * Issues of mutual concern are addressed collaboratively. * Feedback collected in a goal-oriented manner within cooperation group(s) is applied in the operator’s activities. * Cooperation group(s) are offered the opportunity to participate in the planning and development of operations. | | | | | |

**PERFORMANCE INDICATOR 4**

**REPORTING**

**Purpose:**

To confirm that reporting on COI engagement and dialogue activities is open and transparent.

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| **Performance Indicator 4**  **Reporting**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | No reporting on COI engagement occurs beyond the regulated requirements. |
| **B** | Reporting on COI engagement and dialogue activities is inconsistent.  Reporting is internal only. |
| **A** | Documented reporting systems on COI engagement and dialogue activities are in place.  Measures agreed with COIs, their implementation and progress are reported publicly. Reporting must include a self-assessment of the level achieved in the dialogue carried out with the Sámi, reindeer herding co-operatives and other COIs. |
| **AA** | Response to COI concerns is reported publicly on a regular basis.[[4]](#footnote-4)  Opportunities exist for COIs to provide feedback on public reporting. |
| **AAA** | Opportunities exist for COIs to participate in public reporting and influence its scope.  COI feedback on engagement, dialogue and consultation processes and outcomes is actively sought and reported publicly.  COI engagement and dialogue activities are reported as part of corporate responsibility reporting. Corporate responsibility reporting utilises international reporting models. |

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| **Community Outreach Reporting**  **FREQUENTLY ASKED QUESTIONS** | | |
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| **Community Outreach Reporting**  **SUPPORTING GUIDELINES FOR THE ASSESSOR**  Through interviews and the review of documentation, clarify the following issues:   * If the company regularly reports on its COI engagement and dialogue activities. * How these reports are released (i.e. internally only, to the COI only, publicly). * What information is included in the reports. * If COI input is sought on reporting processes and outcomes. * If COIs have an opportunity to comment publicly on the level of success achieved in community outreach activities. * If COIs provide input into the scope of public reporting. * Whether COI engagement and dialogue activities are reported as part of corporate responsibility reporting. | | |

# APPENDIX 1:

# Assessing Community Outreach Performance

# FREQUENTLY ASKED QUESTIONS

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## What is a community of interest (COI)?

Communities of interest include all individuals and groups who have an interest in, or believe they may be affected by, decisions relating to the management of operations. They include, but are not restricted to:

* employees
* neighbours
* landowners
* recreational users of the area affected
* the Sámi[[5]](#footnote-5) (the village meeting of the Skolt Sámi in the Skolt Sámi area)
* reindeer herding co-operatives and reindeer herders[[6]](#footnote-6)
* mining community members
* suppliers
* representatives of other livelihoods
* customers
* contractors
* environmental organisations and other non-governmental organisations
* governments, authorities
* the financial community, and
* shareholders.

## What is a cooperation group?

A cooperation group is a cooperation network consisting of various COIs brought together by the company. For example, local residents, recreational users of the area, representatives of the municipality and other livelihoods and any other COIs may be invited to join a cooperation group. The aim of the cooperation group is to enhance interaction and information exchange between different COIs. The cooperation group can meet every six months, for example, or more frequently if necessary. If several mining projects operate in the area simultaneously, the cooperation group may cover several facilities. In order to ensure working cooperation relationships and sufficient information exchange, it is recommended that a cooperation group be established at the earliest possible stage of the project. Through the cooperation group, various parties are provided with information on the plans and operations of the mine. COIs have the opportunity to proactively discuss plans, any concerns, mitigation measures and other issues to be considered in the operating environment.

If the facility is located in the reindeer herding area or if the facility has a potential impact on reindeer husbandry, it is recommended that a separate reindeer husbandry working group be established to focus on reindeer husbandry issues. In the area specifically intended for reindeer herding specified in Section 2(2) of the Reindeer Husbandry Act, a consultation process on reindeer herding must be ensured.

*If operations are carried out in the Sámi Homeland or the impacts of operations can extend to the Sámi Homeland or operations have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods, an additional, separate Akwé: Kon working group must be established, to which the Sámi Parliament and in addition, in the Skolt Sámi area, the village meeting of the Skolt Sámi, appoint representatives. The working group will assess the impacts/proposals/operations in relation to the rights of the Sámi as an indigenous population, their traditional knowledge and ways of using nature, and the Sámi culture.*

*Prior informed consent given by the Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned must be obtained for operations/projects to be carried out in the Sámi Homeland and/or the impacts of which can extend to the Sámi Homeland and/or that may have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods there. Prior informed consent should consider the rights of the Sámi as well as their traditional knowledge, innovations and practices, the use of the appropriate language and process, the allocation of sufficient time and the provision of accurate, factual and legally correct information. The parties mentioned above have the right not to provide their consent for the project. If necessary, the company must consider the option of not proceeding with the project if the above-mentioned parties object to it. Any changes in operations require the new, prior informed consent of the parties mentioned above.*

## What are negotiated agreements?

This term refers to agreements negotiated with third parties and may include Impact Management Agreements, Participation Agreements, Impact Benefit Agreements, Socio-Economic Agreements, Environmental Agreements, among others. Many such agreements contain confidentiality provisions which preclude public reporting of the terms, conditions and progress made in implementing the agreements.

*If operations are carried out in the Sámi Homeland or the impacts of operations can extend to the Sámi Homeland or operations have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods, the operator must negotiate an agreement on the project with the Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned, if these so wish, with the parties undertaking to comply with the agreement. The agreement must define the rights, obligations and responsibilities of the parties and include provisions on the avoidance, minimisation, mitigation of and/or compensation for any adverse impacts, for example.*

## Can corporate documentation be used to demonstrate facility-level commitment?

A written senior management commitment at corporate level can only be accepted as evidence during a facility-level self-assessment or verification of the Finnish TSM standard, if accompanied by evidence that the corporate commitment is being applied and adhered to at facility level. There must be evidence of a link between corporate documentation and facility-level practices. If such a linkage is established, corporate documentation can be accepted as evidence of facility-level commitment.

## How should regional engagement approaches be reflected within the assessment?

Where multiple facilities are located within a particular region, the company may choose to adopt a regional approach to COI identification and engagement. In such cases, the division of roles and responsibilities between facility-level staff and regional staff should be clearly understood and documented, and supporting systems should be developed and implemented at the appropriate level. The assessment should consider both facility-level and regional systems when assessing the performance of each facility included within the region.

**DEFINITION OF KEY TERMS**

## What is a “system”?

A “system”, or “management system” represents processes that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively to achieve specified objectives and to drive continual improvement in performance. A systems approach requires an assessment of what needs to be done, planning in order to achieve the set objectives, implementation of the plan, and a review of performance in meeting the objectives. A management system also considers the necessary personnel and resource requirements and how the documentation required for the system’s implementation will be created. The documentation covers all types of documentation (paper documents, intranet documents, electronic documents, etc.). Not all practices need to be documented. Within any system, processes and activities are usually given a certain status through clear and precise requirements that are documented as a written procedure, for example. This means that the company can clearly and easily demonstrate that the process or system in question is in place. This would also typically require documented processes or an “audit trail”.

Other definitions associated with systems are:

* Commitment: The formal expression of the management’s commitment to a particular set of issues that presents the stance of the company with respect to interested external parties. A commitment can be expressed as part of the operational principles or policy of a company.
* Practice: Informal, undocumented approaches to carrying out a task.
* Procedure: A formalised, documented description of how a task is to be carried out.

## What does “effective” mean?

Where the term “effective” is used, the element must be fully operational in order for the desired outcomes to be achieved.

## What does “clear and understandable” mean?

Clear and understandable means that the language used in communications is at a reading level that is appropriate for the typical educational level of attainment of the COIs and is free of technical jargon.

## What is meant by “capacity building”?

Capacity building refers to the development, fostering and support of resources and relationships at individual, organisational, inter-organisational and systems levels, so that the COIs can effectively engage with facilities and transfer information internally.

## What are “engagement” and “dialogue”?

Engagement is a process of two-way communication that addresses the specific needs for information of COIs and the company/facility in a way that is understandable to the participants in the discussion. Dialogue is a form of communication that leads to a shared understanding between participants.

## How is “senior management” defined?

For the purposes of community outreach performance assessment, senior management refers to the corporate and/or site personnel with overall accountability for engagement and dialogue processes. For large organisations with many sites, outreach takes place at several levels – community, regional and national. In these circumstances, senior management describes the personnel with overall responsibility for community outreach at each of the various levels.

## What does “accountability” mean?

Accountability: The community outreach management system must identify the party that is ultimately answerable for community outreach activities and for the development and implementation of the community outreach management system within the facility. Such accountability cannot be delegated. Resources are available to the accountable party to ensure that the proper systems (training, equipment, communications, etc.) are in place for effectively meeting their community outreach goals.

## What does “responsibility” mean?

Responsibility: Within the community outreach management system, specific community outreach related requirements and tasks are identified and assigned to specific positions within the facility. It is important that responsibilities are clearly communicated so that the person in each position understands what is expected of him or her.

# APPENDIX 2: SELF-ASSESSMENT CHECKLIST

***Community Outreach***

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| **Facility/Site:** |  | **Company:** |  |
| **Assessed by:** |  | **Date submitted:** |  |

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| **SUPPORTING DOCUMENTATION/EVIDENCE:** | |
| **NAME OF DOCUMENT** | **LOCATION** |
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| **Interviewees:** | | | |
| **NAME** | **POSITION** | **NAME** | **POSITION** |
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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 1: COI IDENTIFICATION** | | | | | |
| **Indicator 1**  **Level B** | Have some local COIs been identified? |  |  |  |  |
| Are plans in place to develop a formal system for identifying COIs? |  |  |  |  |
| *If you have answered “Yes” to all of the Level B questions, continue to the Level A questions. If you have not answered “Yes” to all of the Level B questions, the facility is a Level C facility.* | | | | |
| **Indicator 1**  **Level A** | Is there a documented system for identifying COIs? |  |  |  |  |
| Does the system allow for the identification of COIs at the local or site level, including those with challenging interests? |  |  |  |  |
| Can the identified COIs themselves appoint their representatives for the dialogue? |  |  |  |  |
| Have the social and societal impacts of the project been assessed in advance and been specified for each COI? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* | | | | |
| **Indicator 1**  **Level AA** | Does the site management set the targets for COI cooperation and review them annually? |  |  |  |  |
| Does the system allow for the identification of COIs whose interest in the project may be indirect and issue-based? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all of the Level AA questions, the facility is a Level A facility.* | | | | |
| **Indicator 1**  **Level AAA** | Is there an interactive process that involves COIs in identifying other groups or communities that should be considered COIs? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the facility is a Level AAA facility. If you have not answered “Yes” to all of the Level AAA questions, the facility is a Level AA facility.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 1** | | | | **Level:** |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2: EFFECTIVE COI ENGAGEMENT AND DIALOGUE** | | | | | |
| **Indicator 2**  **Level B** | Are informal engagement processes in place that result in occasional dialogue with COIs? |  |  |  |  |
| Are there plans to develop a documented COI engagement system? |  |  |  |  |
| Has a communications and interaction plan and strategy for it been prepared? |  |  |  |  |
| Has prior informed consent been obtained from the Sámi Parliament, the village meeting of the Skolt Sámi in the Skolt Sámi area and the reindeer herding co-operative concerned, in the case of operations performed in the Sámi Homeland and/or the impacts of which can extend to the Sámi Homeland and/or that have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods? |  |  |  |  |
| *If you have answered “Yes” to all of the Level B questions, continue to the Level A questions. If you have not answered “Yes” to all of the Level B questions, the facility is a Level C facility.* | | | | |
| **Indicator 2**  **Level A** | Is a documented COI engagement and dialogue system in place? |  |  |  |  |
| Does the facility provide assistance in ensuring that COIs are able to participate in engagement and dialogue processes, where appropriate? |  |  |  |  |
| Are communications clear and understandable to COIs, and written in the  local language (as required)? |  |  |  |  |
| Has the communications and interaction plan been implemented? |  |  |  |  |
| Are communications open and is reporting public? |  |  |  |  |
| Are communications and dialogue proactive and two-way? |  |  |  |  |
| Is dialogue carried out in a timely manner and in a spirit of mutual respect in accordance with cultural conventions? |  |  |  |  |
| Is time built into processes to allow for the meaningful review of proposals by COIs? |  |  |  |  |
| Can COIs discuss proposals and form their own view on them on the basis of sufficient information provided in advance? |  |  |  |  |
| Has the company designated an employee who is responsible for community engagement and dialogue? |  |  |  |  |
| Have cooperation group(s) been established at the facility? |  |  |  |  |
| Is the Sámi Language Act complied with in communications if operations are carried out in the Sámi Homeland or the impacts of operations can extend to the Sámi Homeland, or operations have negative impacts on the right of the Sámi to maintain and develop their culture and practise their traditional livelihoods? |  |  |  |  |
| Have designated employees been informed of meeting requirements that have been set for the consultation of representatives of the Sámi and reindeer herders[[7]](#footnote-7) and transferred to the company by central government? Have designated employees been trained in the matter? |  |  |  |  |
| In order to facilitate participation by the relevant representatives of the Sámi and reindeer herders, has the facility asked them to choose local experts from among themselves and offered them opportunities to participate in the process at the earliest possible stage? |  |  |  |  |
| Has traditional knowledge been sought, as appropriate, from the Sámi and has it been applied in support of decision-making and to inform practices, including environmental monitoring? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* | | | | |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |

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| **Indicator 2**  **Level AA** | Is COI input into decisions that affect them actively encouraged? |  |  |  |  |
| Are processes in place to identify the needs of COIs for capacity building so that COIs can effectively participate? |  |  |  |  |
| Does accountability for COI engagement and dialogue rest with senior management? |  |  |  |  |
| Does senior management review engagement and dialogue systems and  processes annually? |  |  |  |  |
| Is engagement and interaction training provided to designated employees, including the appropriate culturally specific training? |  |  |  |  |
| Are consultation protocols jointly established by the Sámi, reindeer herding co-operatives and the company followed or integrated into company consultation procedures to the extent possible? |  |  |  |  |
| Do cooperation group(s) meet regularly and is their work systematic? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the facility is a Level AAA facility. If you have not answered “Yes” to all of the Level AAA questions, the facility is a Level AA facility.* | | | | |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **Indicator 2**  **Level AAA** | Are formal mechanisms or agreements with COIs in place to ensure that they can effectively participate in issues and influence decisions that may interest or affect them? |  |  |  |  |
| Does the facility have a consistent history of meaningful cooperation and dialogue with COIs? |  |  |  |  |
| Are there formal processes for building the capacity of COIs to allow them to participate effectively in dialogue?  If yes, please provide some examples. |  |  |  |  |
| Is feedback collected annually from COIs in order to develop community outreach activities? |  |  |  |  |
| Do COIs contribute to periodic reviews of engagement processes in order to enable continual improvement? |  |  |  |  |
| Do cooperation group(s) concretely participate in the planning and development of operations?  If yes, please provide some examples. |  |  |  |  |
| Where appropriate, are negotiated agreements with COIs in place with respect to operations or projects? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the facility is a Level AAA facility. If you have not answered “Yes” to all of the Level AAA questions, the facility is a Level AA facility.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 2** | | | | **Level:** |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 3: COI RESPONSE MECHANISM** | | | | | |
| **Indicator 3**  **Level B** | Does the facility give occasional consideration to COI concerns? |  |  |  |  |
| Is an informal complaint and response system in place? |  |  |  |  |
| Are there plans to develop a documented complaint and response system? |  |  |  |  |
| *If you have answered “Yes” to all of the Level B questions, continue to the Level A questions. If you have not answered “Yes” to all of the Level B questions, the facility is a Level C facility.* | | | | |
| **Indicator 3**  **Level A** | Does the facility have a good understanding of COI concerns? |  |  |  |  |
| Are these concerns documented? |  |  |  |  |
| Is a formal complaint and response system in place with processes for follow-up and tracking? |  |  |  |  |
| Has an employee responsible for collecting and responding to COI input been designated? |  |  |  |  |
| Does the facility analyse and act on input received from COIs? |  |  |  |  |
| Does the company prepare a response to the input, concerns and views received from COIs? |  |  |  |  |
| Does the company agree, together with the COI concerned, on any action required by the input? |  |  |  |  |
| Is COI input considered in decision-making?  If yes, how? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.*  *NOTE: If a facility has not fully identified its COIs, it cannot be considered as having thorough, documented knowledge of COI issues and concerns.*  *This means that if a facility scored Level B for Performance Indicator 1, it cannot score higher than a Level A for Performance Indicator 3.* | | | | |

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|  | | **Question** | | **Y** | | **N** | | **NA** | | **Description & Evidence** | |
| **Indicator 3**  **Level AA**  **Indicator 3**  **Level A** | | Does the facility have thorough, documented knowledge of COI issues and concerns? | |  | |  | |  | |  | |
| Does senior management consider the results of the engagement and dialogue processes at least annually, in order to determine whether and how to act on them? | |  | |  | |  | |  | |
| Is sufficient time built into site processes for considering and responding to COI concerns, before specific plans are implemented?  If yes, please provide some examples. | |  | |  | |  | |  | |
| Is feedback collected within the cooperation group(s) applied in the operator’s activities?  If yes, please provide some examples. | |  | |  | |  | |  | |
| *If you have answered “Yes” to all of the Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all of the Level AA questions, the facility is a Level A facility.* | | | | | | | | | |
| **Indicator 3 Level AAA** | | Does the facility collaborate with COIs in order to establish and achieve common objectives?  If yes, please provide some examples. | |  | |  | |  | |  | |
| Does this collaboration extend to addressing common community goals? | |  | |  | |  | |  | |
| Is feedback collected in a goal-oriented manner in the cooperation group(s) applied in the operator’s activities? | |  | |  | |  | |  | |
| Are cooperation group(s) offered the opportunity to participate in the planning and development of operations? | |  | |  | |  | |  | |
| *If you have answered “Yes” to all of the Level AAA questions, the facility is a Level AAA facility. If you have not answered “Yes” to all of the Level AAA questions, the facility is a Level AA facility.* | | | | | | | | | |
|  | | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 3** | | | | | | | | **Level:** | |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 4: REPORTING** | | | | | |
| **Indicator 4**  **Level B** | Is there some internal reporting on community engagement and dialogue? |  |  |  |  |
| *If you have answered “Yes” to all of the Level B questions, continue to the Level A questions. If you have not answered “Yes” to all of the Level B questions, the facility is a Level C facility.* | | | | |
| **Indicator 4**  **Level A** | Are reporting systems on COI engagement and dialogue activities in place? |  |  |  |  |
| Are measures agreed with COIs, their implementation and progress reported publicly? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* | | | | |
| **Indicator 4**  **Level AA** | Are responses to COI concerns publicly reported on a regular basis? |  |  |  |  |
| Do opportunities exist for COIs to provide feedback on public reporting? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all of the Level AA questions, the facility is a Level A facility.* | | | | |
| **Indicator 4**  **Level AAA** | Do COIs provide input into the scope of public reporting? |  |  |  |  |
| Is COI feedback on engagement and dialogue processes and outcomes actively sought and reported publicly? |  |  |  |  |
| Are COI engagement and dialogue activities reported as part of corporate responsibility reporting?  Does corporate responsibility reporting follow international reporting models? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the facility is a Level AAA facility. If you have not answered “Yes” to all of the Level AAA questions, the facility is a Level AA facility.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 4** | | | | **Level:** |

1. *Communities of interest also include other representatives of traditional Sámi livelihoods and land-use forms, such as professional fishermen, holders of fishing rights, hunters, gatherers and makers of traditional Sámi handicrafts (duodji).* [↑](#footnote-ref-1)
2. When identifying such measures for addressing issues, demands may also arise that the mining project be halted. [↑](#footnote-ref-2)
3. *The Sámi are represented by the Sámi Parliament in national and international issues; in addition, in the Skolt Sámi area, the Skolt Sámi are represented by the village meeting of the Skolt Sámi; and the reindeer herders in the area are represented by the relevant reindeer herding co-operative.* [↑](#footnote-ref-3)
4. Where COI concerns are considered confidential (e.g. those related to negotiated agreements), public disclosure of the concerns and the company’s response is not required. [↑](#footnote-ref-4)
5. *The Sámi are represented by the Sámi Parliament in national and international issues; in addition, in the Skolt Sámi area, the Skolt Sámi are represented by the village meeting of the Skolt Sámi.* [↑](#footnote-ref-5)
6. *In the reindeer herding area, reindeer herders are represented by the relevant reindeer herding co-operative.* [↑](#footnote-ref-6)
7. *The Sámi are represented by the Sámi Parliament in national and international issues; in addition, in the Skolt Sámi area, the Skolt Sámi are represented by the village meeting of the Skolt Sámi; and the reindeer herders in the area are represented by the relevant reindeer herding co-operative.* [↑](#footnote-ref-7)