

Development and revision of questions for the SEE Questionnaire: a code of practice



3.2009

1. Introduction

1.1 The SEE Questionnaire and the reiterative evaluation process undertaken through the SEE Questionnaire Manager (SQM) are the means by which SEE What You Are Buying Into Ltd (hereafter 'SEE Ltd') evaluates, promotes and strengthens client companies' social, environmental and ethical business practices and policies.

The legitimacy of this process is closely related to the strength of our network of supporting partners in their expertise and authority, rather than being limited to just that of SEE Ltd itself. This means the process by which the questions in the SEE Questionnaire are developed, researched, written and revised is key to the success of the SEE scheme.

Over a period of several years, we have engaged in a continuing dialogue with non-governmental organisations (NGOs), other civil society organisations, government agencies, professional bodies, client companies and other stakeholders to both develop and revise the questions in the SEE Questionnaire. In the future, it is expected that this participation will become even wider as consumers and the general public have increasing opportunity, through the SEE website, to propose new questions and contribute to the development and revision of the questions.

1.2 This Code of Good Practice for the development and revision of the questions is largely based upon the ISEAL (International Social and Environmental Accreditation and Labelling) Alliance Code of Good Practice for Setting Social and Environmental Standards.

1.3 It includes the criteria by which SEE Ltd:

- ensures the questions address relevant problems or concerns;
- ensures that the questions reflect business best practice whenever possible; and
- ensures the SEE Questionnaire is effective in achieving SEE Ltd's stated mission: to build trust in business by promoting transparency and accountability and empower people to buy from, work for and invest in Social, Environmental and Ethical (SEE)-responsible businesses.

1.4 The development and revision of the questions includes the following steps:

- a) An open request for participation, including a permanent function to 'suggest a new question' on the SEEWhatYouAreBuyingInto.com website;
- b) Research and preparation of a briefing document by SEE Ltd to ensure either the proposed question is relevant or that revision is necessary;
- c) SEE Ltd actively seeks comment from stakeholders about the proposed question or revision; and/or
- d) SEE Ltd actively seeks a SEE partner organisation to work closely in the drafting of the question or revision;
- e) A further period of comment on the draft question with stakeholders;
- f) A final decision by SEE Ltd about publication of the question on the SEE Questionnaire;
- g) Continuous review of the question within the SEE Questionnaire by means of: the commenting features within the SQM: the commenting and rating features on the SEEWhatYouAreBuyingInto.com website; active surveys conducted at intervals by SEE Ltd.

1.5 This Code of Practice has been adopted since March 2008, It is subject to regular review.

1.6 Comments on this Code of Practice are accepted at any time. Comments will be considered whenever re-drafting this document. They can be posted to:

SEE What You Are Buying Into Ltd
17 Willow Street
London EC2A 4BT

or emailed to info@SEEWWhatYouAreBuyingInto.com

2. Scope

2.1 This Code of Practice specifies general requirements for the preparation, review, inclusion and revision of questions for the SEE Questionnaire. Compliance with this Code ensures that the processes by which such questions are developed and revised are transparent, consistent and credible. To the extent that it is relevant in the development of the SEE Questionnaire, SEE Ltd is compliant with the criteria and standards of the ISEAL Code, as this helps to support the rigour and credibility of the SEE Questionnaire and the SEE scheme as a whole.

2.2 This Code applies to all the questions, across all the topic areas covered by the evaluation process, in both the core SEE Questionnaire and in any 'sector specific' questions that might be added in the future.

2.3 SEE Ltd has developed questions that are relevant to the social, environmental and ethical (SEE) practices and policies of organisations engaged in commerce and industry, these businesses are the focus of the SEE scheme. The SEE scheme complements rather than supersedes other accreditation or certification processes and standards as applied to products and services.

2.4 This Code of Practice also reinforces the stated aim of SEE Ltd to promote continuous improvement in social, environmental and ethical practices and policies in the SEE listed companies. While improved performance may be difficult to define, it is generally meant to include actions that promote social justice and equity, improve ethical business behaviour and increase ecological sustainability.

3. General provisions

3.1 The Code is applied in its entirety, across every question within the SEE Questionnaire.

3.2 While every effort will be made to meet all the criteria across every question, it must be recognised that this may be difficult at times. The process of engagement and development will inevitably vary between the organisation(s) with whom SEE Ltd is working (SEE partner(s)). The level of participation by our question co-developers will differ, for example, in the commitment of time or level of staff resources available within the other organisation. Consensus about a topic may also be difficult to achieve between the interests of a pressure group and the practical needs of the business environment. Nonetheless, the criteria can not be applied in an ad hoc manner. Rigour and consistency are essential to maintain the credibility of the questions and the SEE Questionnaire.

3.3 As far as it is able, SEE Ltd will ensure that participation in the development or revision of a question reflects a balance of interests among stakeholders for that particular subject matter. Participants in the question development and revision process should have expertise relevant to the subject matter of the question and/or be materially affected by the question.

3.4 Should SEE Ltd receive a challenge or complaint about the SEE Questionnaire itself, a question within it or about the process whereby we develop the questions, we will make objective and documented effort to resolve the issue. A complaints resolution mechanism is publicly available on SEEWWhatYouAreBuyingInto.com (in the Terms and Conditions).

Two elements of the complaints resolution mechanism are designed to ensure that it is credible: a) it is objective and b) it is documented for all to see. Objective means that it is based on a consistent procedure that does not favour one party over another. A documented effort means that the decision-making process and resulting decision are written down and made easily available to all those who request it. This is made clear within the Terms and Conditions. Not least, SEE Ltd reserves the right to publish all correspondence about a complaint.

4. Procedures for the development of questions

4.1 Documented procedures for the development and revision of questions will form the basis of questionnaire activities in SEE Ltd. These procedures have been developed with the active involvement of our stakeholders to achieve a balance between the interested parties. By means of regular review, stakeholders will have opportunities to comment on the question-setting process. The complaints resolution process described above (in 3.4) are readily available to all stakeholders, to encourage participation in the question-setting process.

4.2 The opportunity to comment is fundamental to the SEE website. As transparency is core to the entire SEE scheme, we actively seek opinions from all our stakeholders. As well as posting email and other contact details, we have a specific 'suggest a question' function built into the SEE website to encourage participation. Electronic communications and face-to-face meetings whenever necessary with our SEE partners and other interested bodies, also facilitate this process. We have regular email and telephone conversations with our client companies to ensure we are meeting their business requirements in the content of the SEE scheme. Nonetheless, it must be recognised that it is challenging to engage all participants equally, all the time.

4.3 Generally, for practical reasons, SEE Ltd will initially develop a topic or a specific question or propose a revision itself, before consulting widely with other stakeholders to determine if there are any particular problems. This helps SEE Ltd to gain additional insight on the subject at hand. It is essential to obtain a balance of opinions through active solicitation of input from major interest sectors including: NGOs, other civil society organisations, government, local authorities, international organizations, researchers and academic bodies, unions, retailers, traders, producers and consumers.

4.4 Generally, once a topic or specific question has been identified for development, SEE Ltd will write a briefing document or 'terms of reference' for the question. These terms of reference shall include a justification of the need for the question and clear objectives about what the question is trying to achieve, in particular what social, environmental or ethical issue is the focus of the question and whether it is promoting best practice or preventing poor practice.

Should a stakeholder suggest a question, the same steps will be undertaken except that the stakeholder might produce the terms of reference rather than SEE Ltd.

4.5 Establishing clear objectives for the question will assist SEE Ltd in identifying potential stakeholders and SEE partners with whom to work. Identifying stakeholders and partners at a relatively early stage makes it easier to build the necessary relationships. Practical experience has proved that early involvement of co-developers improves the quality of a question as a wider range of issues and problems can be addressed by more experts.

4.6 Clear objectives also ensure there is no duplication in – or redundant information obtained by, the SEE Questionnaire.

4.7 Our SEE partners and other stakeholders will be given the opportunity to comment on these initial 'terms of reference'.

4.8 After receiving comments about the terms of reference, SEE Ltd may compile a written synopsis of the issues raised. This will be available to the stakeholders via email and/or the website. Comments obtained will be considered on an equal and objective basis.

Taking a comment into account means that it is considered in the development of the question and a justification given if the issue area that the comment addresses is not to be incorporated. The comments will be retained in electronic format, not least because they are a useful starting point for future revisions.

4.9 A version of the question will then be drafted by SEE Ltd or by a SEE partner. In turn, comments on this draft will be actively solicited from stakeholders by the same means as before. Comments will again be taken into account as before.

4.10 The process of drafting, consulting and redrafting will continue until consensus about the question, including its contents, rationale, definitions and answering guidelines, is achieved.

4.11 As SEE Ltd is the company that publishes the SEE Questionnaire and runs the SEE scheme, it remains the final authority to sign-off and to publish a new question. This might be with or without a named SEE partner cited against the question.

4.12 Information about the new questions will be sent to SEE listed companies so they can begin to respond, using the SQM, as soon as possible. The new questions will also be published promptly on the SEE website so the stakeholders and wider public can see them. Such publication is core to the evaluation and accreditation process of the SEE scheme.

4.13 A general public, rather than stakeholder, review phase in the development of a new question has not, so far, been used. In the future, it is anticipated that the internet and the SEE website will encourage and promote wider participation for which new procedures may be developed within this Code, as necessary, in keeping with the SEE scheme ethos of transparency and accountability.

5. Procedures for the review of questions

5.1 Questions in the SEE Questionnaire will be reviewed by SEE Ltd on a periodic basis for their relevance and effectiveness in meeting their stated objectives as set out in the initial terms of reference (4.4 above). A review process shall occur at least every twelve months and if necessary, they will be revised in a timely manner.

5.2 Proposals for revisions can also be submitted by any stakeholder or member of the public through the online 'Suggest a Question' and 'commenting and rating' functions as well as using other means of contact. These will be considered by SEE Ltd through the consistent and transparent process as set out in this Code.

5.3 The review process will consider whether there is still a need for the question and/or whether external circumstances have altered to the point of requiring changes in the question, such as new answering guidelines or defining terms, or additional information in the rationale.

5.4 The review process will also include a formal comment submission period, as set out in section 4, while recognising that stakeholders are able to submit comments or proposed revisions at any time.

6. Administrative practice

6.1 It is established good practice to publish a work programme and ensure all the stakeholders are aware of practical details like contact information, timeframes and deadlines. It is also useful to provide a regular 'briefing' document explaining current issues and progress. This briefing would be subject to revision in light of comment, experience or the duration of the development process. It is likely to be disseminated by email to the interested parties.

6.2 SEE Ltd needs to use its resources efficiently and, as a business, it will need to carefully consider how long a period of consultation might last. As far as practicable, the consultation period will meet the standards of best practice in the public sector, though commercial constraints might occasionally curtail the duration of discussion. At the core of the process is an ethos of complete transparency and accountability.

As the SEE scheme grows, it is likely that it will become more multi-national with a wider base of stakeholders. It is expected that this Code will need revision to take into account differences such as the methods used to communicate, the need for translation and sufficient time to address cultural and legal variance.

6.3 SEE Ltd will always strive to achieve a balance between the interests of the SEE Partners and other interested bodies, and those of a normal company running a commercial business. Priority in decision-making will always be to achieve this balance. This practical, business focus is made clear to all stakeholders at the beginning of their participation.

A briefing document produced during the development or revision process is particularly useful to ensure a) that a commercial-minded business focus is maintained and b) the terms of reference for the question are met. The regular briefing document ensures that no one party can dominate the development of the question and that every question in the SEE Questionnaire can meet the needs of a business that is trying to continuously improve its SEE performance.

6.4 A record of question development and revision activities will be maintained by SEE Ltd in electronic format for as long as the question is in use on the SEE Questionnaire or for up to five years, whichever is longer. This should include: lists of the interested parties involved at each stage of the process, the terms of reference, comments received, and all draft and final versions of the question.

7. Effectiveness and relevance

7.1 The Social, Environmental or Ethical (SEE) rationale, definition of terms used and answering criteria are clearly and explicitly stated in each question. This is essential as it provides conformity in the evaluation or assessment of any company undergoing the process of becoming a SEE listed company. The same criteria are applied to all entities.

7.2 All the questions will use language designed to promote consistent interpretation and will avoid language that may create ambiguities in interpretation. Definitions are provided whenever particular words or phrases need to be explained or clarified.

7.3 While the objectives are defined in the terms of reference at the outset of the question development process, it is really important that these are kept in mind as the question is developed or revised. Publication of a new question should be dependent on a strong likelihood that it will achieve its intended social, environmental or ethical objectives (as defined in the terms of reference see 4.4) and thereby address the most pressing SEE issues and meet the key objective of promoting improved practical performance by SEE listed companies.

7.4 SEE Ltd will take account of relevant legal, regulatory and market needs, as well as scientific and technological developments in the development or revision of a question for the SEE Questionnaire. The questions will always build on and complement existing regulatory requirements and any other accreditation or certification schemes that support the aims and objectives of the SEE scheme.

7.5 The questions will be accompanied by clear answering guidelines based on 'corporate best practice' and/or other appropriate policies and procedures. They will take into account economic, social and environmental rules and regulations to recognised national or international standards. The great strength of collaborative working is that such guidance is clearly derived from expert opinion and a consensus between stakeholders.

Within the context of the SEE scheme, however, the answering guidelines must be applicable to businesses of different sizes and in different business sector. The answering guidelines, therefore, should not result in questions that are inapplicable for enterprises that operate at different scales or in different sectors, particularly small and medium-sized enterprises.

7.6 The basis for achieving consistent evaluation of responses to each question in the SEE Questionnaire is to use answering guidelines that are objective and verifiable. Objective criteria do not favour any one type of production or interest group. However, the answering guidelines will also be flexible enough to be applied by enterprises of all sizes and business sectors and to account for local variations.

Some important SEE issues will inevitably be applicable to particular but not to all business sectors. To address these, sector specific questions will also be developed in the future. They will be in addition to the questions in the core SEE Questionnaire.

7.7 The questions are written as combinations of process, management and performance criteria. They avoid using specialist design or descriptive characteristics in order to be as open as possible and to allow for innovation and new ways of dealing with fluid and complex SEE issues. Questions do not favour a particular technology or any patented item or process. The answering guidelines contribute to the achievement of the stated objectives for that question, reflecting current best practice in business. This is to make it easier to show the positive social and environmental impacts that the business practice or policy is having.

7.8 During the development, drafting and review stages, SEE Ltd and the SEE partners will consider whether and how compliance with each answering criteria can be ascertained. This should include:

- a) what should be described in the responses, in line with the answering guidelines (criteria);
- b) how these practices and policies might be measured (indicators) or assessed within a company or business sector and between companies and sectors.

Criteria for assessing an individual question, within the SEE Questionnaire, for its efficacy and quality will include 1) consistency with the initial terms of reference for that question, 2) consideration of the quality of responses from SEE listed companies and 3) whether the answering guidelines provide sound and verifiable responses.

Once this evaluation is in place, it becomes possible to identify the range of 'acceptable' and 'unacceptable' practice or policies (benchmarking).

7.9 The SEE scheme does not determine what is 'right' or 'wrong', 'good' or 'bad' nor set a 'pass/fail' mark for any of the practice or policy described by a SEE listed company in response to an individual question. Rather, it sets and applies the highest standard of openness and honesty, assessed against the requirements of the answering guidelines. The SEE scheme recognises that no company is ever going to be perfect in its handling of the various SEE issues within its own business sector. However, we do expect the transparent reporting integral to the SEE scheme to identify best practice and set precedents in the SEE issues examined. We do expect the transparency and accountability to promote responsible and sustainable business.

7.10 Because of the high level of transparency within the SEE scheme, SEE Ltd does not believe it is necessary to establish an oversight board or fixed group of parties interested in the development or revision of the questions. Every participant, all stakeholders and the wider public have access to the process of writing, reviewing and revising the questions in the SEE Questionnaire and anyone can comment on and participate in the evaluation process at any stage, through the functions on the SEE website. As such, anyone has a real opportunity to affect decisions about the content of the SEE Questionnaire and about the processes by which the questions continuously evolve. This Code explains the criteria and process by which changes are made.

7.11 The success of the SEE scheme, with its mission to make the world a better place, depends in large part on the ability of SEE What You Are Buying Into Ltd to build and maintain trust in the development of the SEE Questionnaire and of the questions asked. Very mindful of this, SEE Ltd will always seek to conduct itself appropriately, meet the requirements of this Code and consistently work through the highest levels of transparency and accountability. This Code will be subject to regular review and revision, as required, to meet these standards.