



# **The Copper Mark Assessor Management Procedure**

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## I. Introduction

The Copper Mark Assessor Management Procedure details the process for the approval, monitoring, and evaluation of independent reviewers, individual assessors, and assessment firms.

Independent reviewers, individual assessors and assessment firms are required to follow the policies and procedures of the Copper Mark as well as uphold a high-level of integrity and ethical behavior.

## II. Types of Applicants

The Copper Mark approves senior-level individuals with extensive knowledge and practical experience in implementing or assessing the subject matter covered by the [Copper Mark standards](#) at the types of entities eligible for an assessment against these standards.

The Copper Mark reviews and approves three types of applications:

- **Independent Reviewer:** An independent service provider or individual (third party) that is approved by The Copper Mark and contracted by The Copper Mark to review Participants' self-assessment. An independent reviewer can also be a Copper Mark Assessor. The specific roles and responsibilities are outlined in Section 2.C. of the Assurance Process.
- **Individual Assessors:** An individual that is approved by The Copper Mark and contracted by a site to assess and verify conformance to the Copper Mark standard(s) in accordance with the [Copper Mark Assurance Process](#). The specific roles and responsibilities are outlined in Section 2.B. of the Assurance Process.
- **Assessment Firms:** An assessment firm that is approved by The Copper Mark and comprised of individually approved assessors. The assessment firm may be contracted by a site to assess and verify conformance to the Copper Mark standard(s) in accordance with the [Copper Mark Assurance Process](#). assessment firms are responsible for ensuring adherence by the individual assessor(s) to both the Copper Mark policies and procedures and the assessment firm's policies and procedures referenced in Section III.A. below.

Though different requirements must be met, the application process is the same for each type of applicant.

### III. Requirements for Approval

#### A. Assessment Firms

Assessment firms must demonstrate their ability to manage their approved Assessors and engagement with the program in accordance with The Copper Mark policies and procedures. Assessment firms must provide evidence that they have and implement the following:

- Policies and procedure to manage perceived or actual conflicts of interest in accordance with the expectations defined in the Copper Mark Assurance Process.
- Policies and procedures to ensure that assessments are carried out with the highest level of quality in accordance with the Copper Mark policies and procedures.
- Policies and procedures to manage professional and ethical behavior of all employed and contracted assessors.
- Practices to ensure assessor skills training and continuing education requirements.
- A complaints mechanism, whistleblowing policy, or other process to receive and manage grievances from internal and external stakeholders.
- The ability to manage assessment teams to ensure that only approved Assessors are appointed to conduct assessments for the Copper Mark and only within the scope of their approval.
- At least one (1) fully approved assessor / assessment team for mining and / or smelting and refining.

#### B. Individual Assessors and Independent Reviewers

Individuals seeking approval independently or as part of an assessment firm must meet the requirements as defined in Section 4 of the [Copper Mark Assurance Process](#). These are broadly categorized in:

- General requirements
- Auditing experience
- Subject-matter expertise
- Qualifications

Assessors and / or independent reviewers must refer to the Copper Mark Assurance Process for the full list of requirements.

Individuals are required to complete trainings recommended or provided by the Copper Mark on an ongoing basis in order to maintain approval.

## IV. Application Process

### A. Application

Applicants who wish to be approved and listed on the Copper Mark's [website](#) may submit a completed application with supporting evidence and send it to [info@coppermark.org](mailto:info@coppermark.org). Supporting evidence shall include for each individual:

- CV,
- Assessment logs,
- Policies and procedures related to conflicts of interest, quality control, and grievances / complaints.

Applicants may also provide sample reports, training records or other relevant documentation to support their application.

For the application to be accepted, each individual applicant must sign a declaration tab. Note that typed names will not be accepted.

Assessment firms must also complete the first tab of the application workbook.

### B. Review and Decision

The Copper Mark staff will review the application and supporting materials. The Copper Mark may request additional evidence or documentation to support adherence to one or more requirements where appropriate. Using the information provided, the Copper Mark will make a determination whether the individual applicant is:

- Fully approved,
- Approved with limitations based on subject-matter expertise, familiarity with types of operations, language ability, and / or geographical experience,
- Not approved.

Applicants may re-apply for approval once they meet the requirements.

### C. Public Information

The Copper Mark will publish on its website the following information for approved assessment firms:

- Company name
- Company website
- Contact name
- Contact email
- Contact phone number
- Geographic Scope

- Any limitations as identified by the Copper Mark

The Copper Mark will publish on its website the following information for approved Assessors who are not affiliated with an approved assessment firm:

- Name
- Contact email
- Contact phone number
- Geographic Scope
- Any limitations as identified by the Copper Mark

The Copper Mark does not currently publish information about approved independent reviewers.

## V. Monitoring and Evaluation

### A. Monitoring Process

The Copper Mark may use the following methods to continually monitor and evaluate assessor / assessment firm performance:

- Assessment records: the Copper Mark reviews every report for adherence to program expectations. A detailed list of what the Copper Mark reviews is available in Annex I.
- Shadow assessments: where Copper Mark staff or observers accompany an assessment.
- Training records: as required to maintain approval or through corrective action / continuous improvement plans.
- Feedback provided by participants
- Grievances lodged against assessors / assessment firms through [the Copper Mark Grievance Mechanism](#)

### B. Outcomes

If during the monitoring and evaluation there is an issue identified in regard to the assessors ability to adhere to the Assurance Process or any other relevant policy or procedure, the Copper Mark will notify the assessor / assessment firm of the issue and engage to develop a path for improvement. The nature of the improvement plan will vary based on the issue identified but may include additional training or quality control measures.

The Copper Mark will use suspension and / or termination only as a method of last resort when the individual or firm either:

- Does not participate in the improvement plan; or
- Does not complete the improvement plan satisfactorily; or
- Engaged in any of the actions listed below giving right to immediate suspension or removal of the assessor or assessment firm.

The Copper Mark reserves the right to suspend or remove an assessor or assessment firm immediately for any of the following reasons:

- Violation of the Copper Mark policies and procedures, including but not limited to use of non-approved assessors or undisclosed conflicts of interest.
- Ethical breach of conduct including but not limited to bribery, misrepresentation, or plagiarism.
- Breach of confidentiality.
- Where the actions or inactions of an assessor or assessment firm present a reputational risk to the Copper Mark.

### C. Communication

The Copper Mark will keep a record for each individual / firm listing all completed assessments, identified issues, improvement plans and resolutions throughout the year and share them upon request.

The Copper Mark may annually provide aggregated performance data to Copper Mark leadership and other stakeholders as appropriate.

Assessors and assessment firms who have questions about this document may contact the Copper Mark at [info@coppermark.org](mailto:info@coppermark.org).

## Annex I: Copper Mark Report Review

The Copper Mark reviews every independent review report and every assessment report that is submitted for the Copper Mark Assurance Process Step 3: Independent Assessment. The Copper Mark will look at three areas and record any issues or concerns that might arise and address them directly with the assessor / firm.

The three broad areas are applicable to both the independent review report and the assessment report. The sub-bullets below are specific to the assessment report.

### Process

- Has the assessor been approved by the Copper Mark for all criteria / geographies / types of organizations covered in the Independent Assessment?
- Does the assessment report cover all the required elements as detailed in Section 5 of the Copper Mark Assurance Process?
- Was the scope of the assessment in accordance with the scope determined by the Copper Mark?
- Were risk areas identified by the Copper Mark included / highlighted / clear?
- Were all relevant assessment activities included?
- Did the assessor take a risk-based approach, using information from the self-assessment and Independent Review Report?
- Is there sufficient information to demonstrate the assessment was completed in accordance with the expectations (ISO 19011 or ISAE 3000, triangulation, independence)?
- Were all deliverables provided within a timely manner?

### Substantive

- Are there any misunderstanding or misinterpretation of the requirements or expectation for any criteria of the Copper Mark standards?
- Has the assessor applied the expectations as detailed in the Copper Mark Criteria Guide?

**Behavior / Professionalism:** Has the Copper Mark identified any of the following:

- Violation of the Copper Mark policies and procedures, including but not limited to use of non-approved assessors, undisclosed conflicts of interest.
- Ethical breach of conduct including but not limited to bribery; misrepresentation; plagiarism
- Breach of confidentiality
- Reputational risk to the Copper Mark
- Continued late report submissions