ISEAL Code of Good Practice

Summary of feedback on the second draft of the Code

November 2023
About this document

This document provides a summary of the feedback on the second draft of the ISEAL Code of Good Practice and how this informed development of the final draft. We would like to thank all the respondents who provided feedback on the second draft, and to those who supported the consultation by engaging with events and sharing information about the consultation with colleagues and stakeholders.

For more information on the development of the Code, please see the Code consultation webpage: www.isealalliance.org/iseal-code-consultation
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Summary of the second round of consultation
About the ISEAL Code of Good Practice

The ISEAL Code of Good Practice is a normative reference that operationalises the ISEAL Credibility Principles.

The Code defines **credible management** of the components of a **sustainability system**, including standard-setting, assurance, claims, and impacts (monitoring, evaluation, and learning).
About the ISEAL Code of Good Practice

The Code revises and integrates the ISEAL Impacts, Standard-Setting, and Assurance Codes of Good Practice, and also incorporates essential practices from the ISEAL Sustainability Claims Good Practice Guide.

The revision and integration approach was approved by the ISEAL Board in May 2020. Its development is informed by a multistakeholder Steering Group and overseen by the ISEAL Technical Committee.
Public consultation approach

The public consultation on the second draft of the revised and integrated Code ran from 31 May to 30 July 2023. We also recorded and considered feedback submitted up to 16 August 2023.

The consultation aimed to receive feedback from stakeholder groups that were underrepresented in the first consultation, and to check with participants in the first consultation that their feedback had been adequately addressed in the second draft.

The consultation provided mechanisms for in-depth, mid-level or high-level feedback. Feedback was received through a range of consultation mechanisms, including a survey, workshops and webinars, excel spreadsheet, emails, and meetings.
Participation in the public consultation

We received 33 unique responses* (survey and excel submissions) representing 30 organisations, across 11 countries.

The majority of respondents were standards systems (76%), and largely based in Europe (64%).

* These statistics do not include 400+ participants in workshops and webinars. These events were targeted at stakeholders from groups and geographies less represented in the excel/survey feedback, and feedback was aggregated and used as input to the final draft of the Code.
Publication

All information about the second consultation can be found here: www.isealalliance.org/iseal-code-consultation

This includes:
› Comment log (English only)
› Past webinar recordings
› Previous draft versions of the Code

If you would like to discuss any of your earlier inputs and how these were taken into account, please contact consultation@isealalliance.org
Summary of feedback and changes

› Common or overarching feedback
› Chapter summary
› Additional changes to the final draft
## Common or overarching feedback

<table>
<thead>
<tr>
<th>Feedback summary</th>
<th>Action taken in response (clause no. refers to final version)</th>
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</thead>
<tbody>
<tr>
<td>› Application to the scheme as a whole presents feasibility challenges and more clarity is needed on how this applies to schemes with a variety of different programmes.</td>
<td>Introduction of a new ‘Scope’ section provides clarity on how schemes determine what is included in scope of the Code, and this is referenced in clause 1.1. The definition accounts for challenges faced by schemes with wide ranging activities.</td>
</tr>
<tr>
<td>› More clarity is needed on the meaning of ‘scheme component’</td>
<td>An explanation of scheme component is included within the ‘Scope’ section and ‘Introduction’. This replaced the definition of scheme component previously included in Section 0, which was deleted. Changes made throughout the Code to reflect updated definition.</td>
</tr>
<tr>
<td>› Timescales for review are arbitrary/too long/too short</td>
<td>Adjustments throughout the Code better support auditability. The process of defining the regularity of review frequencies will be included within compliance guidance.</td>
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Common or overarching feedback

**Feedback summary**

› More clarity is needed on the intent and expectations of due diligence and remediation clauses.

› Throughout the Code, more clarity is needed on the intent of clauses, expectations for compliance, and the importance of the practices described.

› Introducing reference to gender is a positive step. Calls for acknowledgement of additional work/higher level of ambition.

**Action taken in response (clause no. refers to final version)**

Significant revision to relevant clauses; terminology minimised, guidance added, amendments to improve clarity, and adjustments to improve feasibility (e.g., a scheme’s role in facilitating remediation does not need to be made publicly available) – see 1.4.

Guidance reviewed and updated where necessary. Clarity about evidence for compliance will be addressed in compliance guidance. All additional requests for clarity noted and used to identify priorities for developing supporting guidance.

No changes made to content; level of ambition appropriate for new content within the Code as it reflects minimum practice needed for credibility.
Section 0: Policies, procedures, and responsibilities for scheme components

Feedback summary
› Consolidating content relevant to each scheme component creates challenges, as the relevant content and process may be different.

› More clarity is needed on the frequency of review and revision.

Action taken in response (clause no. refers to final version)
Section 0 and corresponding definition of scheme components removed and replaced by the ‘Scope’ section and incorporated within clauses throughout the final draft.

Clause moved to Section 2 and editorial amendments made to improve clarity – see 2.8. Improved definition of scheme components also provides better clarity of expected review.
Section 1: Strategy for creating impact

Feedback summary

› Requiring all staff to receive an orientation to the scheme’s intended outcomes, causal pathways, and background assessment presents feasibility challenges.

› Clauses are very broad and sometimes duplicative.

Action taken in response (clause no. refers to final version)

Scope narrowed to include only the Board, standards’ committee, executive team, and all those who lead scheme components – see 1.5.

Significant editorial changes made to streamline content and refine the focus of clauses. For example:

• clause on remediation removed and integrated within the due diligence clause – see 1.4
• editorial and content adjustments to the background assessment to improve clarity and narrow the focus of the clause – see 1.2
Section 2: Scheme integrity, governance, and operations

Feedback summary

› Intent and expectations for assessing risks of associating with business partners is unclear

› Content relevant to risk assessments is duplicative of other sections of the Code.

› The relevance of the policies applicable to governing and decision-making bodies, staff, and consultants is unclear.

Action taken in response (clause no. refers to final version)

Significant editorial changes made to improve clarity, and introduction of new guidance – see 2.6.

The clause on threats to assurance integrity has been combined with the clause addressing system level risks – see 2.5. New definitions added to the glossary to support understanding.

All policies reviewed but identified as necessary for credibility. Definitions included in glossary where identified as necessary to support interpretation.
Section 3: Scheme performance and continual improvement (monitoring, evaluation, and learning; or MEL)

**Feedback summary**

› Clauses are very broad and sometimes duplicative

**Action taken in response (clause no. refers to final version)**

Significant editorial changes made to streamline content and refine the focus of clauses. For example,

- sub-division of clauses to improve clarity – see 5.1
- simplifying language and minimising terminology
- reduced range staff to receive annual updates – see 5.6

› Range and scope of MEL activities presents feasibility concerns

MEL plan of activities replaced by publicly available information on planned and ongoing activities, and one output published on each priority topic within a 5-year period - see 5.2. Adjustments to scope of MEL made to acknowledge the challenge of covering full scope of activities - see 5.4.

› Further clarity is needed on ethics guidelines

New guidance added. See 5.5.
Section 4: Data and information management

Feedback summary

› Clauses are duplicative and the sequence of the section could be improved.

› Clarification needed on terms such as ‘legal requirements’ and content about confidentiality

› Ambition could be raised by including resolution of data ownership disputes and the amount of data collected during public consultations.

Action taken in response (clause no. refers to final version)

Clauses with overlapping content deleted, and clauses covering two separate topics sub-divided – see 4.6 and 4.7.

Editorial changes and guidance updates made.

No change made; while important, it is above the level of ambition relevant to the Code.
Section 5: Stakeholder engagement

Feedback summary

› More clarity and consideration of feasibility needed on expectations for stakeholder mapping.

› More clarity is needed on the terminology used and expectations of the dispute resolution system.

› Calls for more clarity throughout the section.

Action taken in response (clause no. refers to final version)

Specificity on stakeholder categorisation minimised – see 3.1. Engagement with subject matter experts is removed but added to the strategy section – see 1.2.

Significant updates made to the dispute resolution system clause to improve clarity, but the intended outcome remains the same – see 3.5.

Significant editorial adjustments made throughout the section to improve clarity.
### Section 6: Standards development and maintenance

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<td>› Maintaining a reference of relevant national and/or international laws and regulations is a significant feasibility challenge.</td>
<td>Requirement removed and replaced with considering relevant legislation as input into standard review and revision – see 6.15.</td>
</tr>
<tr>
<td>› Further clarity is needed about the scope of standards relevant to the section.</td>
<td>Editorial adjustments made to improve clarity – see 6.1.</td>
</tr>
<tr>
<td>› Further clarity is needed about the relevance and meaning of substantive revisions.</td>
<td>Editorial changes made and guidance updated to improve clarity – see 6.12. Definitions added to the glossary.</td>
</tr>
<tr>
<td>› Relevance of terminology to a wider range of systems could be improved.</td>
<td>‘Requirements’ used instead of ‘criteria’.</td>
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Section 7: Assurance

Feedback summary

› Clauses are overly specific.

› Level of detail published about assessment results is too low/too high.

› Terminology has limited relevance to schemes reliant on ISO or the wide range of assurance models.

Action taken in response (clause no. refers to final version)

Specificity reduced, removing:
• types of technology in assessment methodology – see 7.3.
• Detail of publicly available information about fees – see 7.23.

No change: minimum information is feasible and necessary for credibility, but there are barriers to raising the performance level any higher at this time.

Terminology reviewed and updated where relevant. Strategy employed is to use broadly applicable terms that allow relevance to any assurance model context. Similar terms included in the glossary to highlight differences in terminology.
Section 8: Claims

Feedback summary
› More clarity is needed on terminology and extent of expectations.
› Terminology used to describe traceability and chain of custody is inaccurate.
› Content of clauses is duplicative.

Action taken in response (clause no. refers to final version)
Terminology refined and editorial changes made to improve clarity. Additional guidance on expectations for monitoring added.

Terminology updated wherever referenced in the Code.

Clauses on reporting misuse of claims and responsibilities for the claims system incorporated into 8.7. Additional sequential changes made.
Additional changes to the final draft

- Significant efforts to streamline content and minimise duplication. For example:
  - clauses relevant to personnel competency consolidated – see 2.4
  - review to ensure requirements for publicly available information are not duplicated (e.g., within publicly available information clause and process clause).

- Sequential changes throughout the Code to align with the ‘Scope’ section and improve flow. For example:
  - swapping section 3 and section 5 so that the latter four sections represent core scheme components

- Providing more clarity on how MEL quality is achieved, consolidating content from separate clauses – see 5.3.

- Auditability improved by ensuring language of the Code matches expectations for compliance evidence. For example, clarifying distinction when evidence of documentation is needed vs evidence of implementation.

- Desired outcomes updated to ensure consistency of addressed outcome rather than practice.
Thank you

More information is available at www.isealalliance.org/iseal-code-consultation

Please direct any questions or comments to: consultation@isealalliance.org