

Implementation Review (formerly Verification) Framework

Introduction

This policy is intended to detail all aspects of the Voluntary Principles Implementation Review process, including the purposes of implementation review, the process by which members are selected annually, details about the format, length and record of presentations and support for Members with respect to the content of their presentations.

Pursuant to a motion adopted at the 2015 Annual Plenary Meeting in London, all Participants in all three Pillars are required to make a presentation that provides verification of a Participant's efforts to implement the Voluntary Principles. These presentations were made mandatory for all Participants in 2019. In 2024, these presentations were renamed Implementation Review (formerly Verification).

Purpose of Voluntary Principles Implementation Review

Implementation review presentations are a great opportunity for knowledge sharing and discussion of best practices, they are, at the core, an accountability mechanism. As such, they must provide an opportunity for VPI members to assess the presenter's ongoing compliance with the Voluntary Principles.

Implementation Review presentations are intended to:

- give focus to how a Participant's protocols, procedures, and policies reflect efforts to implement the Voluntary Principles;
- provide an opportunity to provide the Plenary with a closer window into specific regions and operations that can highlight successes and/or challenges with implementation of the Voluntary Principles;
- allow Participants to exchange information, identify best practices, and potentially coordinate to improve implementation efforts at specific extractives locations and to strengthen adherence to the Voluntary Principles writ large.

Selection Criteria for Performing a Voluntary Principles Implementation Review

Members from all Pillars are selected annually to provide presentations based on previously approved criteria: Engaged Corporate Members are prioritized, followed by those who have had a serious human rights incident, those who volunteer, those who have had a structural change (acquired new operations), those who have never done a verification presentation and finally date of last verification presentation (see Annex A).

Voluntary Principles Implementation Review Presentation

In accordance with the selection criteria above, Members will be asked to present at the Annual Plenary during breakout sessions on an in-person basis (or hybrid for additional presenters as needed) but will also be given the option of conducting a virtual implementation review.

Presentation Length & Format

Presentations should be 75-90 minutes in total, consisting of a 15-20 minute presentation, followed by 10-15 minutes of responses to peer-review input from two reviewers, and up to 30 minutes of open Q&A (with priority given to peer reviewers for follow-up comments/questions).

Thus far, most Participants have selected to provide this information as a set of PowerPoint slides and to provide further detail in their oral presentation of the slides. An ideal presentation is about 10-15 slides and provides clear and concise information on a specific operation(s) and general policies that serve as examples for the steps the Participant has taken to advance the implementation of the Voluntary Principles (see below for suggested topics).

Most participants provide their presentation on PowerPoint slides and provide further detail in their oral presentation. The best presentations tend to use the slides only as way to guide the discussion provided by the presenter. Presentations where the presenter essentially reads from the slides are considered less effective and engaging.

Distribution of Presentation

Each presenter should share its presentation with the Secretariat no later than fourteen (14) business days prior to the presentation date. The Secretariat may review and share comments or make suggestions for improvement, which the presenter may choose to incorporate at its discretion.

Additionally, the password-protected section of the Voluntary Principles website contains all the presentations that presenters have agreed to share, under the "View Documents" tab.

Content

Members should focus their implementation review in part on (i) security and human rights risks and risks to successful implementation of the Voluntary Principles including ownership structure risks, as determined by the member in consultation with the reviewers; (ii) their assurance processes if applicable; and (iii) innovative approaches and lessons learned.

Many of the Participants that have presented to date have chosen to focus on a specific aspect of their implementation efforts, either by exploring their human rights- and security-related policies and procedures as implementing globally or by looking at their policies and approach to human rights and security at a specific location in a specific region.

In some instances, a Participant's presentation provides a comparison of two or three operations spread across one or several regions, and use that cross-comparison to contextualize the Participant's broader implementation efforts and challenges that have arisen from implementation across several settings.

Overall, the implementation review presentations were originally designed to provide Participants with flexibility regarding the substance of their presentations.

Presenters are requested to keep introductory remarks that provide background on the Participant, its history, and its business to a minimum except to the extent such remarks are directly relevant to the issues that will be discussed in the presentation.

Some suggested topics for the presentation include:

- Experiences implementing the VPs at organizational and operational levels, including challenges and successes
- Experiences with measuring performance and sustainment of VP processes (including KPIs, risk assessments, etc.)
- Examples of stakeholder, community, and host government engagement
- Experiences with implementation of the Roles and Responsibilities documents
- Experiences with internal/external reporting and the challenges and successes in driving performance
- Case studies of assurance processes specific to particular operational sites
- Case studies of implementation of assurance processes at an organizational level
- Challenges or successes in implementing the Voluntary Principles
- Engagement with public and private security forces to implement the Voluntary Principles
- Efforts to use the Voluntary Principles to positively address issues with forced labor, modern slavery, child labor and children's rights, and gender-based violence in the context of extractives operations.
- Provide updates and insights on how their organization manages key VPSHR-related risks

Engaged Corporate Members should also include the following:

- Provide an overview of the company, its business and where it operates;
- Provide an overview of the company internal management systems responsible for security and VPSHR implementation;
- Indicate the overall level of progress made in implementing the VPs throughout the company's operations so far;
- Demonstrate how the company's protocols, procedures, and policies reflect efforts to implement the VPSHR (providing examples, e.g. risk assessment, training, etc);
- Provide information on whether public security is employed at any operations, as well as and engagement efforts/MOUs with these forces to support human rights compliance;
- A deeper dive on at least one challenging operation; describe the challenges and efforts so far in addressing them; and
- Any other information the company thinks is relevant to the members' understanding of its particular context, challenges and successes.
- Companies should also feel free to ask questions and seek guidance from other members on particularly challenging problems in the course of their presentation.

While the presentations are a great opportunity for knowledge sharing and discussion of best practices, they are, at the core, an accountability mechanism. As such, they must provide an opportunity for VPI members to assess the presenter's ongoing compliance with the Voluntary Principles.

Note: Within the framework of the Voluntary Principles, the most direct implementation of the Principles is done by members of the Corporate pillar. Nevertheless, as a multi-stakeholder initiative, each of the pillars has an important role to play in implementation. Governments and NGOs may cover additional elements in their presentations.

The Participants of the NGO pillar range significantly in their core mandate and approach to tackling the issue of security and human rights in the extractive sector. For example, while some NGOs are significantly involved in working with companies, governments and other NGOs on the implementation of the Voluntary Principles at the site level, others may be more involved in promoting change at the corporate policy level or at the level of the Voluntary Principles as an initiative. It is important that NGO presentations reflect the individual situation of the organization.

Peer Review and Role of Reviewers

Each implementation review presentation is followed by a “peer review” session conducted by two other Participants, who can ask clarifying questions and provide additional comments on the content of the presentation. At least one of the Reviewers must be from a different Pillar than the Presenter.

Reviewers will be given an advance version of the presentation at least seven (7) days prior to the presentation date. This will provide the Reviewers an opportunity to prepare questions, comments, and suggestions for the presentation.

Participant’s answers to these questions and comments should also inform the Participant’s future Voluntary Principles annual reports.

Record of Presentations

Implementation Review Presentations will not be recorded whether held in person or on-line, in order to encourage frank discussion among all Members.

The Secretariat will prepare a brief summary of each presentation, which will be shared with Members upon request. The Secretariat will also maintain a register of all implementation review presentations given by each Member.

Outstanding Questions following Presentation

The Secretariat will circulate any remaining questions from reviewers and other participants that could not be asked during the session. The presenter will have 14 days from receipt of the questions to provide the answers. The Secretariat will then consolidate the questions and responses and post the resulting document. The resulting document will be subject to the same confidentiality terms as the presentation itself. If applicable, the Secretariat will collect any recommendations received from participants and provide them to the presenter no later than one month after the presentation.

Annex A

Criteria for selecting members for Implementation Review (formerly Verification) Presentations

1. **Engaged Corporate Member**
 - As per the Governance rules, Engaged Corporate Members must complete an implementation review (verification) presentation during the two-year period of engaged membership.
2. **Significant Human Rights Incidents**
 - Any Member, irrespective of Pillar, with a significant human rights incident would be asked to present on a priority basis so long as any of the following make a request for a presentation on the incident:
 - i) the Member itself, or
 - ii) the Steering Committee.
3. **Volunteers**
 - Subject to the criteria set out below, those Members who volunteer to present will be given priority with the caveat that volunteers who have presented more recently will still come later than members which have not presented or presented earlier.
4. **Structural Changes**
 - Any structural change resulting in the acquisition of global operations which have never been subject to implementation review (verification) would move a member into the category of those which have not given an implementation review (verification) presentation.
5. **Membership Date**
 - Among Members who have never given a presentation, the sequence of presentations will be determined based on date of joining, with older Members asked to present before newer Members.
6. **Date of Last Presentation**
 - Members that have never given an implementation review (verification) presentation would be asked to give a presentation before those that have already presented.
 - Among Members that have given presentations, those with less recent presentations will be asked to present earlier.