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## Purpose of this document

This document serves as a reference for stakeholders and the general public on the Rules of Procedure of the RBA Voices Feedback tool. It also illustrates how issues can be escalated by workers and stakeholders through the RBA Worker Voices technology platform directly to the RBA as a third-party oversight body.

## What is the RBA Voices tool?

RBA Voices is RBA’s worker voice technology platform, aimed primarily at facilitating communication and feedback from employees to their employer. Communication channels for workers to access the tool currently include a downloadable app, a QR code that links to an online platform, and a webform that links to the same online platform. RBA has invested in this technology in order to provide a multi-industry level solution that is easy for facilities to deploy; is scalable across global supply chains; and incorporates an escalation option with the RBA providing third-party oversight. RBA Voices is a complimentary tool for RBA Members and their suppliers that can sit with existing locally mandated grievance mechanisms and supports RBA members and suppliers to meet regulatory requirements on complaints mechanisms for their supply chain. For purposes of this document, the terms “complaint,” “feedback,” and “grievance” will be used interchangeably.

## Who can use RBA Voices?

RBA Voices is primarily a tool for the supply chain partners of RBA, RLI and RGA members. RBA Voices is a complimentary<sup>1</sup> tool for RBA Members and their suppliers that can sit with existing locally mandated grievance mechanisms and supports RBA members and suppliers to meet regulatory requirements on complaints mechanisms for their supply chain. For purposes of this document, the term “feedback” will be used throughout to encompass all types of feedback including “grievance” and “complaint.”

## How does RBA Voices work?


**RBA Voices** is designed to be deployed to facilities to enhance engagement in the first instance between workers and facility management. RBA Voices has multiple functionalities: (1) Feedback Tool, (2) Worker Learning, (3) Worker Surveys, and (4) VAP in-house interview support. This document provides details of how the **Feedback Tool** works, and the processes and technology RBA has put in place to ensure it meets the requirements of an effective operational-level and supply-chain grievance mechanism.

**RBA Worker Feedback tool** also has a public/stakeholder engagement QR/webform option that companies can choose to deploy as part of their own community engagement practice. This option is made available to Members to support their compliance to emerging regulatory requirements on supply chain complaints mechanisms. The same process and policies for the app apply to the public webform option.

Facilities that agree to have the tool deployed receive information through their designated Points of Contact (POC) on how to use the tool at the facility. RBA has created step-by-step instructions and materials for onboarding, deployment and management of the RBA Voices Worker Feedback

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<sup>1</sup> RLI members pay a small annual fee in addition to member dues to access RBA Voices

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tool, located in an onboarding website sent to individual Members and facilities. The onboarding process steps have been tailored for each user group as follows:

- Members / Buyers
- Suppliers / Facilities
- Workers/Community Members

The facility is responsible for user training using the provided onboarding materials to workers, worker representatives, and other targeted users such as community members to ensure users understand how to access and use the tool. All day-to-day feedback and user interaction is to be administered by facility management, and it is expected that the majority of feedback raised would be fully resolved internally. However, users are able to escalate issues to RBA or other designated third parties based on certain conditions.


### Worker/Submitter View and use of the Tool

Workers and other identified users can choose to download the app or use a single log-on QR code provided by the Facility. The tool defaults to the language setting of the device being used, and feedback entries are translated through an API for users who speak a different language to that of the facility management.

- a) **Full App Option:** With the full app option, users scan a QR code to download the RBA Voices app on their phone, which will default to the language setting on their phone. Through the app, workers will have access to a training video and instructions on how to use the feedback tool. Workers also have access to other functionalities in the tool using this option, such as worker learning. The Factory POC should deliver internal training on how to submit feedback anonymously and the escalation processes using the training materials on the onboarding website. Workers should be able to ask clarification or follow-up questions with the designated facility POCs. If workers want access to responses to their submissions, they need to create an account with contact information which will not affect their ability to submit anonymous feedback.
- b) **Feedback QR code only option:** With the webform/single-use QR code, workers can submit one-off feedback on a webform. It will require them to create an account online, and the option to do this anonymously is similarly provided.

Regardless of the option used, the QR code will be specific for each facility, which the Factory POC should provide to workers or other users by posting them in accessible areas throughout the facility. Workers or community members must create an account in order to access the system. An email address will be required so that escalation parties such as the RBA can contact the submitter, however, if they choose to submit anonymously this information will not be visible to facility management. Users receive alerts within the app and their email address if they receive a response to their submission. Users can also elect to provide phone contact information when creating an account, which will not be accessible by the Facility if the user decides to submit anonymously.

The RBA Voices Feedback tool is also designed to ensure workers who face additional barriers or vulnerabilities (related to disability, language, etc.) are able to easily access the tool. Workers are able to track their feedback through the “feedback ID” ticket numbering system, which is then linked to their account created in the system. When the facility management responds, the worker

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will see the response to their ticket and two-way communication can proceed until the issue is resolved.

Additional access channels such as a call-in (voice mail, return call) option will be made available in certain locations so users can follow-up on a specific case using the generated Feedback ID. Call-in numbers can be found within the app or in the worker training materials on the onboarding website. It is expected that all users of RBA Voices read and agree to the End User Agreement, which includes a privacy policy that explains how personal data in the tool will be used from submission to case management.

### Feedback Categories

The categories of issues that a submitter can submit feedback about are available at the start of the submission process. These categories have been aligned with the RBA Code of Conduct and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, and allow workers to report feedback about multiple human rights risks (e.g., social, labor, environmental, and occupational health and safety). Where regulatory requirements require coverage beyond what is included in RBA's Code of Conduct, workers and/or anyone submitting feedback can select the most closely related category and provide further information to describe the issue. Submitters can only choose one issue category per submission, however, they can submit multiple times so they can report on the full breadth of their concerns.

Workers/stakeholder using the app can access FAQs and how-to videos on usage of the app, as well as access human and labor rights courses in the RBA Voices Learning Map that explains their rights and examples of the kinds of situations that they can report on. This does not replace the responsibility of facilities to provide human/labor rights training to their workers.

### Escalation

Where the issue is not responded to or resolved in a satisfactory manner, the escalation feature of the tool allows workers to raise the issue confidentially to the RBA. There are two ways by which submitters can escalate an issue to the RBA: (1) through the app/facility QR code, or (2) where a public webform is used, directly to the RBA member/RBA, or (3) call-in to voice mail in selected countries.

- (1) The option to escalate the feedback will become available to the user based on the severity level of the issue raised, typically between 1-7 days of submission. The "escalate" button will be available on the User's app either after their Facility POC does not respond to them promptly or after a feedback submission has been closed by the Facility POC. By default, the RBA<sup>2</sup> will provide third-party, independent oversight of the feedback tool and process escalated cases. Members can also elect to use a different third-party organization, such as a local NGO, to receive and act as escalation case manager, which would have to be granted access to and trained on the system. All parties should be informed of the designated third-party oversight organization used.
- (2) RBA Members may elect to have a public webform version of RBA Voices available on their website. This webform links directly to the same backend as the app-based RBA Voices.

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<sup>2</sup> Refer to section below 'How RBA Handles Escalation'

Workers can submit escalations directly to the RBA or the relevant Member directly through this provided channel. All submissions made through this would immediately go through the RBA handling process.

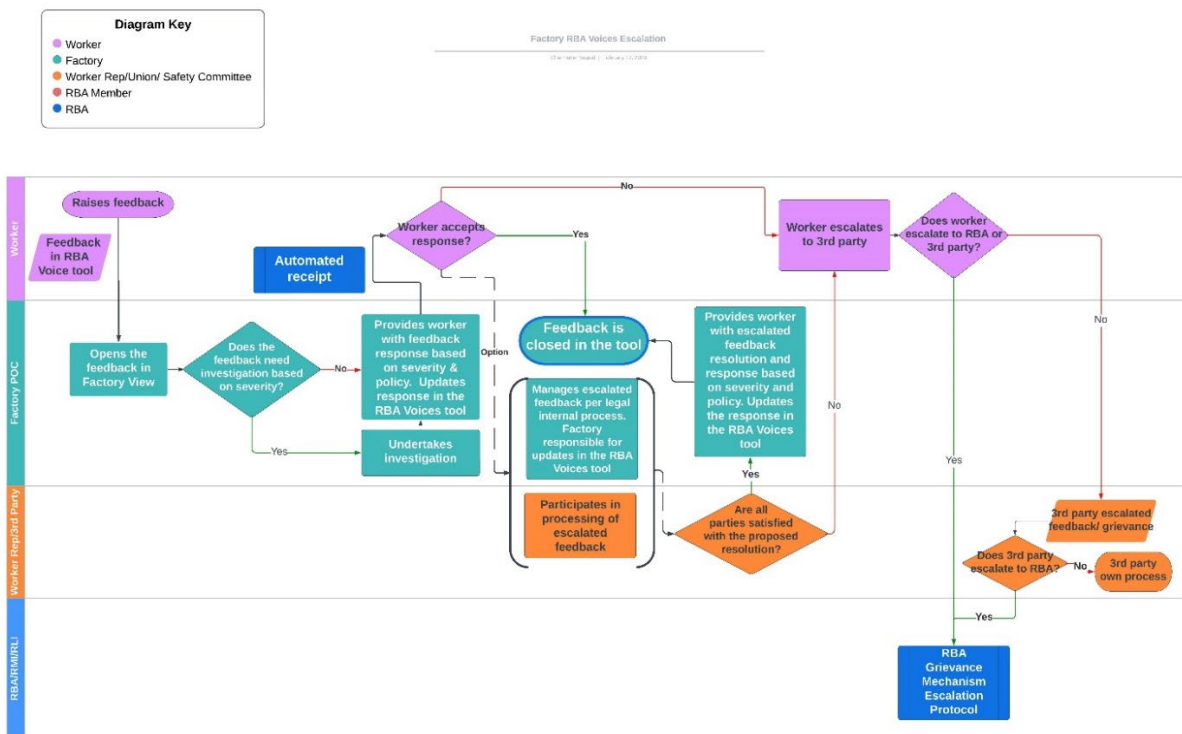
- (3) **Call-in to Voice Mail:** In selected countries, workers may also opt to call-in to voice mail to submit and follow-up on their feedback. Workers must follow the prompts to provide contact information as well as a summary of the issue they are following up on. Upon receipt of the voice mail, RBA representatives will call back workers to verify their concerns.

### Worker Representatives

If there is an existing worker representative organization or trade union, or a worker-management committee, these parties should be included in the internal escalation process. RBA Voices supports existing social dialogue/representation structures by allowing for the possibility that a Factory POC could designate a worker rep POC at a later date in future versions of RBA Voices. In the interim, it is expected that Factory POCs will also train worker reps on the usage of the tool.


### Non-Retaliation

The RBA has a strict non-retaliation policy. Workers and community users can notify the RBA of any retaliation for reporting feedback to the RBA through the RBA Voices platform with the escalation function.



### Facility-level view and use of the tool

By default, a facility will be granted access to the platform by deployment of an RBA Member upon signing and submission back to RBA of a User Agreement. A modified version of RBA Voices will be

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made available to facilities by Q3 2023 so they can activate and use the tool without RBA Member deployment. Facilities and their workers will not be able to access the Surveys or Worker Learning if they choose to self-deploy.

Facilities choosing to use RBA Voices will have access to extensive onboarding training videos and step-by-step instructions on the onboarding webpage. The Facility POC will have access to the 'backend' management portal for RBA Voices, where they will be able to see and respond to worker feedback. The backend portal menus automatically adopts the language of the device used, and if the menu language is not available it defaults to English. Within the portal, the Facility POC can use the "translate" function to read and respond to the submissions in the relevant languages. Evidence can be uploaded by the facility and the submitter into the thread of the issue. Each submission has a Feedback ID that allows all parties to keep track of the status of issues submitted. If feedback is raised anonymously, the facility POC will only see "anonymous" and won't see the user ID or email/contact information of the submitter. All feedback details remain confidential in the system. Facilities are expected to resolve feedback submitted within a reasonable timeframe. The system has an alarm based on the recommended response times for each category of feedback submitted, to remind Facility POCs of any open feedback that is not responded to and unresolved. After the recommended response times by severity of the issue have lapsed, a worker would then have the option to escalate an issue to the RBA or the designated escalation third party. If a submission cannot be resolved within the recommended time frame, the Facility POC must maintain communication in the system with the submitter until the issue can be properly closed. In case a facility prematurely closes a feedback case submitted and the issue is not yet resolved, the submitter may elect to use the escalation function. Where a facility receives a complaint directly from an external stakeholder, the details of such engagement remain confidential until the issue is escalated to the RBA.

### RBA/RLI Member view and use of the tool


For RBA Member-led deployments of the tool, members are responsible for:

- a) Engaging their selected facilities to obtain agreement to use the tool in advance of deployment;
- b) Ensuring a correct Point of Contact has been identified for each supplier facility; and
- c) Selecting from the two deployment options to the facilities: providing workers with access to the full app; a single log-on QR code to the webform.

By default, Members receive escalated feedback through the RBA with RBA as the designated independent, third party. Members may opt to setup the system to receive this directly from workers and stakeholders through a public webform, or to designate a different independent, third party to serve as the escalation case manager. Per the section above, expected facility users should be informed of where their feedback will go if they choose to escalate. Members choosing a different escalation partner should also be responsible for ensuring training in the use of RBA Voices.

### Reporting

Members will be able to view aggregate reporting information through the Member portal about feedback received, disaggregated by facility, feedback category, severity, and response times – including delays and workers who have chosen the escalation function. Members will not be able to view individual feedback comments or the responses by facility management. Data export by

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category of issues is being developed to support mandatory reporting on the kinds of issues raised through this tool and the status of resolution.

### Accessibility and Alternative Communication Channels

The RBA has developed the Feedback Tool functionality to be deployed flexibly in a way that meets current and forthcoming regulatory requirements. The following communication channels are therefore available to be deployed, either to complement or as an alternative to the primary functionality described above.

#### Access by Workers with limited access to technology

Facilities should ensure that workers with limited access to technology (phones, tablets, etc.) are able to submit feedback. The following options should be considered as RBA Voices is deployed:

- Where workers do not have smartphones but wifi is available, the RBA recommends that facility management provide “stations” in a private setting, with stationary tablets/PCs where workers can create a login and submit feedback tickets and receive a response.
- Workers should be made aware that they can submit or follow up on feedback using a borrowed phone, as long as they remember their account log-in details or the Feedback ID.
- Local civil society organizations and other stakeholders would also have the option to submit feedback *on behalf of a worker through public webform channels* as long as they identify the specific facility within the submission and have evidence that the facility is within the supply chain of an RBA/RLI/RMI Member.
- Workers with access to the call-in to voicemail option may also submit and follow up on their feedback in this manner, however they will need to have some access to the app/facility poster in order to get the contact details.

#### Access by Stakeholders, the General Public, and indirect suppliers

The following public channels are available as a method for stakeholders and the general public to contact the RBA:

- A public QR code and webform<sup>3</sup> on the RBA website that provides an option to submit feedback related either to a particular facility that is within the supply chain of RBA/RLI/RMI Members; or provide more general feedback about an RBA/RLI Member or Supplier including RMI assessment program participants<sup>4</sup>.
- A public QR code and webform that can be placed on the website of the Member company, which could default escalate to the RBA and would require that the facility where the issue took place is identified.


Additional channels to submit feedback will be added to RBA Voices in the future based on demand.

### How escalation is handled by the RBA

For every escalation received on RBA Voices, the RBA will provide an automated response to the submitter to confirm receipt and notify them they will receive a response. RBA staff will follow up to inform them of the expected timeframe based on the category and severity of the issue.

<sup>3</sup> <https://www.responsiblebusiness.org/grievance/>

<sup>4</sup> This option is made available to Members to support their compliance to emerging regulatory requirements on supply chain complaints

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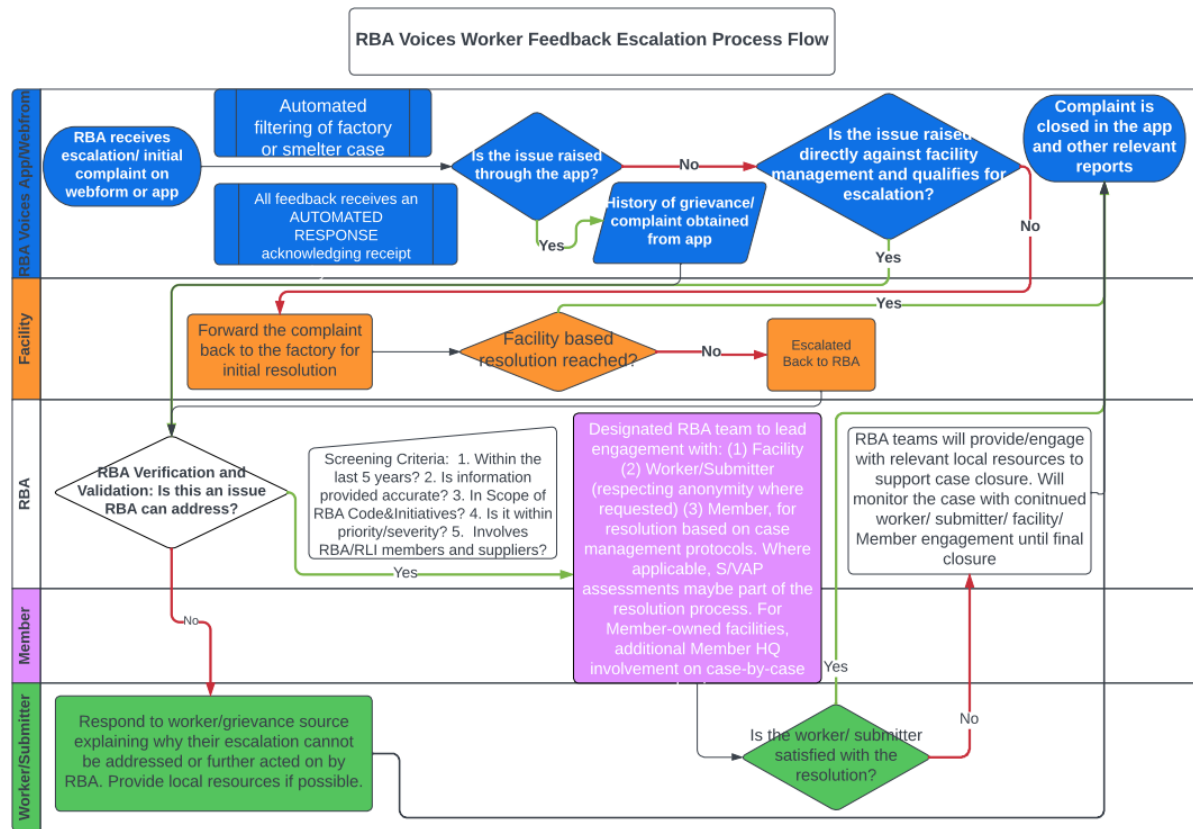
Feedback escalated to the RBA will be handled as follows:

- RBA Voices Feedback Tool primarily aims to strengthen facility-based feedback management, so a determination will be made first if the received escalation involves an issue that could have been resolved at the facility level based on RBA Code and VAP standards. The RBA will notify the facility to provide the opportunity for it to be resolved directly with the submitter, particularly in cases where the case might have still been in process by the facility management or if it was received through an RBA public webform.
- If a case is escalated to the RBA after a submitter has not received a satisfactory resolution, the RBA will take steps to verify the feedback by seeking further information from the submitter, facility, Member and other stakeholders as relevant and in line with RBA Code compliance requirements.
- Where a facility may have recently gone through an on-site assessment, RBA will take steps to obtain the assessment report and check to see if the issue escalated had been raised prior and if there are any current corrective action plans related to the escalated issue.
- Feedback from workers that amount to severe allegations will be handled by RBA staff, in line with regular RBA/RLI/RMI membership compliance protocols<sup>5</sup>.
- All escalations deemed valid and in scope will be followed up with submitters, and the escalation will only be closed upon their confirmation. The costs of any onsite verification visits coordinated by the RBA will be borne by the facility.

**Note:** In cases where a grievance filed is determined to be a criminal offense, the RBA will refer the case to local authorities. The RBA expects that some cases escalated by workers or other stakeholders will be beyond the scope of RBA’s authority or remit. In these cases, the RBA will provide an explanation to the submitter on why their case cannot be addressed by the RBA, and the RBA will strive to ensure workers are provided with referrals to local resources.

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<sup>5</sup> Based on severity, these could include investigations and corrective action plans or audits, to be determined by RBA staff based on RBA Code and VAP standards.



### Engagement with local stakeholders / NGOs

The RBA will continue to engage workers, as well as local, national, and regional stakeholders on a regular basis to improve RBA Voices Feedback so it can more effectively support the resolution of grievances within member supply chains and prevent future grievances.

### ANNEX 1: Issues and Severity Ratings

Issue types are divided into four categories within RBA Voices Feedback: Critical, Urgent, Standard, and General Assistance. Upon receipt of an escalation by the Case Escalation team, the RBA and its Initiatives will map the submissions to the RBA Code of Conduct VAP and RMI Responsible Minerals Assurance Process (RMAP) Annex II priority findings, or the OECD Annex 2 risks. For the RMI, please refer directly to the RMI Grievance Mechanism [document](#). In all instances, the RBA and its Initiatives aim to send a confirmatory message to the submitter on the details of their submission.

RBA VAP Finding levels	Disqualifying Priority Findings (DPFs)	Priority Findings	Major/Minor Findings
Confirmatory response urgency	Immediate confirmatory response	Urgent confirmatory response	Standard confirmatory response
Estimated timeline for confirmatory response	Up to seven (7) business days		



Each issue/category that can be reported via the app/webform has been mapped to the German Supply Chain Due Diligence Act (SCDDA) requirements. Mapping to the reporting requirements of other relevant supply chain due diligence regulations will be undertaken as they come into force.

RBA and RLI will require that certain issues (as defined by its Membership Compliance requirements) be remediated with an assessment or investigation. The timeline for closure of escalation cases will depend on the severity of the issue, with certain priority issues required to be positively remediated and closed 90 days after an on-site verification. As complex cases may require more time for remediation and closure, the status of each escalation case is monitored and managed by the RBA.

## ANNEX 2: RBA Grievance Mechanism

