



Item 05 – GSSB Due Process Adherence Report for the review of the GRI Universal Standards

For GSSB [information]

Date	[Day Month Year]
Meeting	10 June 2021
Status	To be submitted to the DPOC for review
Project	GRI Universal Standards
Description	<p>GRI Standards and related Interpretations are to be developed and issued in the public interest and according to due process as defined in the GSSB Due Process Protocol.</p> <p>The GSSB Due Process Adherence Report (DPAR) presents an explanation and, where applicable, evidence of how the Due Process Protocol has been followed for the review of the GRI Universal Standards.</p> <p>The DPOC is requested to review the GSSB DPAR and to conclude whether or not due process has been followed for the review of the GRI Universal Standards.</p> <p>Password protected resources</p> <p>Resources to support the evidence of adherence that have not been published in the public domain have been made available to you via links to an evidence folder. The evidence folder contains sub-folders, whose titles reflect each Due Process step sub-heading and are numbered in the order these appear in the DPAR.</p> <p>Due to personal information contained in these resources, they have been protected with a password. The password to access these resources will be provided separately.</p> <p>Para 15 and 17-34 cover how the Due Process Protocol has been followed for both the review of the GRI Universal Standards and for the review of GRI's human rights-related Standards.</p>

This document has been prepared by the GRI Standards Division and is made available to observers at meetings of the Global Sustainability Standards Board (GSSB). It does not represent an official position of the GSSB. Board positions are set out in the GRI Sustainability Reporting Standards. The GSSB is the independent standard setting body of GRI. For more information visit www.globalreporting.org.

The following requirements are not applicable to this project:

Para 9 to 13 (see **Formation of Technical Committees and Project Working Groups**).

This document does not represent an official position of the GSSB

1 Adherence with due process

Project	Description
Review of GRI's Universal Standards	<p>The GSSB initiated a project to review the GRI Universal Standards, which consist of <i>GRI 101: Foundation 2016</i>, <i>GRI 102: General Disclosures 2016</i>, and <i>GRI 103: Management Approach 2016</i>.</p> <p>The primary driver for revising the Universal Standards was to address the recommendations arising from the review of GRI's human rights-related Standards. Feedback received from reporting organizations and other stakeholders, as well as information gathered through reviews of sustainability reports using the GRI Standards, provided further areas of the Universal Standards to be addressed.</p> <p>Overall, the project aimed to:</p> <ul style="list-style-type: none"> • integrate the expectation of due diligence into the GRI Standards; • provide greater clarity on key concepts, reporting principles and disclosures in the Universal Standards and ensure they are aligned with recent developments in the area of responsible business conduct; • assist reporting organizations in understanding the reporting requirements and how they demonstrate compliance in a transparent way; • drive consistent application of the GRI Standards; • encourage more relevant and comprehensive reporting for experienced reporting organizations; • enable first time reporters and SMEs to more easily apply the GRI Standards; • improve overall usability of the GRI Standards. <p>The project was split into four work stream areas:</p> <ul style="list-style-type: none"> • Work Stream 1: Human rights and due diligence related disclosures • Work Stream 2: Reporting Principles • Work Stream 3: 'In accordance' criteria • Work Stream 4: General disclosures <p>More information about Work Streams 1 to 4 can be found on pages 3-4 of the project proposal. The project proposal can be found here.</p>

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				Y	N	Issue Note
Q3 2018	<p>Project identification and prioritization</p> <p>Para 6 (Basis of identification of potential new projects)</p>	<p>The GSSB agreed in its September 2018 meeting to commence the review of the GRI Universal Standards.</p> <p>Stakeholder input</p> <p>‘Item 02 – Input for Discussion on GSSB Work Program 2017-2019’ sets out feedback from the public comment process and GSSB members to inform the finalization of the GSSB Work Program for 2017-2019. Item 02 was discussed during the October 2016 GSSB meeting.</p> <p>Ahead of this meeting, GSSB members were asked to provide their individual opinions on priority Standards to review/ develop, as well as the relative priority of other work areas for 2017-2019. The GSSB members prioritized the in accordance criteria and the materiality concept for review.</p> <p>During the transition from the GRI Guidelines to the GRI Standards, the GSSB identified the Reporting Principles and sections of <i>GRI 102: General Disclosures</i>, as well as the ‘in accordance’ criteria as areas that should undergo a revision once the modular structure was in place and experience had been gained with the implementation of the GRI Standards.</p>	<p>Refer to lines 39-41 of the ‘Summary 25-26 September 2018 meeting’.</p> <p>Refer to lines 12-46 of the ‘Summary 27 October 2016 meeting’.</p> <p>For comments on the in accordance criteria, refer to lines 299 (# 6) and 305 (# 1 and # 2) in ‘Item 02 – Input for Discussion on GSSB Work Program 2017-2019’.</p> <p>For comments on the materiality concept, refer to line 305 (# 5) in ‘Item 02 – Input for Discussion on GSSB Work Program 2017-2019’.</p> <p>Refer to the ‘Project background’ section on page 2 of the ‘Review of GRI’s universal Standards: Project Proposal’.</p>			

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		<p>The human rights Standards have been prioritized for revision by stakeholders, the GRI Stakeholder Council, and the GSSB when they were consulted on the draft GSSB Work Program 2017-2019.</p> <p>International considerations</p> <p>The review of GRI's human rights-related Standards has been informed by developments in the field of responsible business conduct.</p> <p>Since 2018, a GRI Technical Committee has been developing recommendations on how to update GRI's human rights-related Standards in light of these developments, including how these developments may impact core concepts, principles and disclosures in the GRI Standards.</p> <p>The developments in the field of responsible business conduct and the recommendations arising from the review of GRI's human rights-related Standards resulted in the need for revisions to the Universal Standards.</p>	<p>Refer to the DPAR for the review of GRI's human rights-related Standards for information about stakeholder input on human rights.</p> <p>Refer to the 'Project background' section on page 2 of the 'Review of GRI's universal Standards: Project Proposal'.</p>			
Q1 2019	<p>Project commencement</p> <p>Para 8 (Development and approval of a project proposal)</p>	<p>The GSSB agreed in its September 2018 meeting to commence the review of the the GRI Universal Standards. The GSSB requested the Standards Division to prepare a proposal with the schedule and scope for the Universal Standards.</p> <p>The Standards Division prepared a draft project proposal for the review of the GRI Universal Standards, which was discussed and approved</p>	<p>Refer to lines 39-41 of the 'Summary 25-26 September 2018 meeting'.</p> <p>Refer to 'Item 09 – GSSB Project Proposal for the Review of GRI's Universal Standards' and lines 90-107 of the 'Summary 7 February 2019 meeting'.</p>			

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		<p>during the February 2019 meeting. The GSSB did not recommend any changes during the meeting.</p> <p>The draft project proposal was shared with the GRI Board and GRI Stakeholder Council for their comments. The GRI Board did not recommend any changes to the proposal. The GRI Stakeholder Council made a comment specifically in respect of human rights disclosures, but did not provide any specific feedback on the Universal Standards project.</p> <p>The Standards Division presented the GSSB with the final project proposal during its March 2019 meeting. The Standards Division presented the objectives and scope of the project for the review of the GRI Universal Standards, along with an overview of the proposed work streams.</p> <p>The GSSB approved ‘Item 08 – Final Project Proposal for the Review of GRI’s Universal Standards’ during its March 2019 meeting.</p>	<p>Refer to the description on the cover page of ‘Item 08 – Final Project Proposal for the Review of GRI’s Universal Standards’, lines 201-202 of the ‘Summary 25-26 March 2019 meeting’, lines 67-71 in ‘Item 02 – Stakeholder Council response to the GSSB’s Sector Standard Proposals and Proposal for Review of Universal Standards’, and the Evidence folder.</p> <p>Refer to ‘Item 08 – Final Project Proposal for the Review of GRI’s Universal Standards’ and lines 182-211 of the ‘Summary 25-26 March 2019 meeting’.</p> <p>Refer to lines 203-204 of the ‘Summary 25-26 March 2019 meeting’ and listen to minutes 1:36:14-1:37:17 of the recorded Livestream.</p>			
Not applicable	<p>Formation of Technical Committees</p> <p>Para 9 (Appointment of Technical Committee)</p>	<p>Not applicable. A Technical Committee was not formed for the review of the GRI Universal Standards.</p> <p>However, experts have been engaged to provide technical advice on the:</p> <ul style="list-style-type: none"> labor-related disclosures in <i>GRI 102</i>; governance-related disclosures in <i>GRI 102</i>; 				

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	<p>Para 10 (Advice from Technical Committee)</p> <p>Para 13 (Engagement with the GSSB)</p>	<ul style="list-style-type: none"> incorporation of a required management 'sign-off' statement into the GRI Standards. <p>Labor-related disclosures in GRI 102</p> <p>During its 24-25 September 2019 meeting, the GSSB advised the Standards Division to organize an expert group to assess the requirements in Disclosures 102-8 and 102-41. The expert group comprised the GSSB members from the labor constituency and representatives of the ILO and BusinessNZ.</p> <p>Governance-related disclosures in GRI 102</p> <p>During its 24-25 September 2019 meeting, the GSSB advised the Standards Division to contact governance experts to assess the need for any significant changes to the governance-related disclosures: Disclosures 102-18 to 102-39.</p> <p>The Standards Division reached out to the International Corporate Governance Network (ICGN) who participated in the review and provided their feedback.</p> <p>The Standards Division has incorporated the ICGN feedback into the proposed amendments to the governance disclosures (see 'Item 04 – Draft GRI 102 Governance disclosures').</p>	<p>Refer to lines 274-275, 278-279, and 303 of the 'Summary 24-25 September 2019 meeting'.</p> <p>Refer to lines 292-295 and 304-305 of the 'Summary 24-25 September 2019 meeting'.</p> <p>Refer to lines 67-70 of the 'Summary 6 February 2020 meeting'.</p> <p>Refer to lines 78-80 of the 'Summary 6 February 2020 meeting' and refer to 'Item 03 – ICGN letter' for the ICGN feedback.</p>			

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		<p>Management 'sign-off' statement</p> <p>During its 24-25 September 2019 meeting, the GSSB suggested further investigation on the feasibility of a required management 'sign-off' statement into the GRI Standards.</p> <p>The Standards Division has therefore interviewed a range of stakeholders including those representing regulators, stock exchanges, the accountancy and audit profession, and policymakers and performed further research. Based upon this input the Standards Division made proposals to the GSSB for the consideration of incorporating a management statement (see 'Item 04 – Universal Standards: management statement').</p>	<p>Refer to line 329 of the 'Summary 24-25 September 2019 meeting'.</p> <p>Refer to lines 6-9 of 'Item 04 – Universal Standards: management statement'.</p>			
Not applicable	<p>Formation of Project Working Groups</p> <p>Para 11 (Appointment of Project Working Group)</p> <p>Para 12 (Multi-stakeholder composition)</p>	<p>Not applicable. A Project Working Group was not formed for the review of the GRI Universal Standards.</p> <p>However, a sub-committee of four GSSB members was convened to provide overall advice and direction on all areas of the project, with the GRI Technical Committee on Human Rights Disclosure providing specific input for:</p> <ul style="list-style-type: none"> • Work Stream 1: Human rights and due diligence related disclosures • Work Stream 2: Reporting Principles 	<p>Refer to lines 58-60 in 'Item 08 – Final Project Proposal for the Review of GRI's Universal Standards' and lines 407-408 in the 'GRI Universal Standards public comment – Explanatory memorandum for the exposure draft'.</p>			

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	Para 13 (Engagement with the GSSB)	A balance of multi-stakeholder constituencies is not required for a GSSB Sub-Committee, but it should be noted that the labor, business enterprise, and mediating institutions were represented, along with the Vice-chair of the GSSB.				
Q1 2019 to Q2 2020	<p>Development of proposed Standards</p> <p>Para 14 (Public forum, roundtable, consultation paper, field test)</p>	<p>Public forum, roundtable, consultation paper, field test</p> <p>The Standards Division conducted two field tests to gather feedback from stakeholders before the revised content was exposed for public comment:</p> <ul style="list-style-type: none"> • Revisions to <i>GRI 102</i> – between 22 November and 4 December 2019. • Revisions to <i>GRI 101</i> and <i>GRI 103</i> – between 24 February and 9 March 2020. <p>The Standards Division informed the GSSB about these field tests during its November 2019 and February 2020 meetings. The GSSB made no comments about the field tests.</p> <p>In addition to sharing the draft content with external stakeholders, the content of <i>GRI 101</i> and <i>GRI 103</i> was also submitted to the GSSB for its review.</p>	<p>21 November 2019 – listen to minutes 21:03-23:51 of the recorded Livestream.</p> <p>6 February 2020 – refer to lines 41-43 of the ‘Summary 6 February 2020 meeting’ and listen to minutes 14:31-15:44 of the recorded Livestream.</p> <p>Refer to the Evidence folder for this item.</p>			

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		<p>The Standards Division gathered results via email from eight stakeholders and seven GSSB members on the revisions to <i>GRI 101</i> and <i>GRI 103</i>, and from six stakeholders and the GSSB sub-committee on the revisions to <i>GRI 102</i>.</p> <p>During the May 2020 GSSB meeting, the Standards Division explained its proposed approach to engagement during the public comment period. This included the public comment survey, webinars, and regional engagements.</p> <p>The engagement included:</p> <ul style="list-style-type: none"> • Regional workshops held in Africa, Greater China, Hong Kong, Latin America, North America, Singapore, and Taiwan in July and August 2020. • Public webinars held on 24 June and 9 July 2020. <p><i>Interaction with the GSSB on the exposure draft</i></p> <p>The proposed revisions to the Universal Standards were discussed by the GSSB during its in-person meeting in September 2019, and during public and private sessions organized between August 2019 and April 2020.</p>	<p>Refer to lines 194-202 of the 'Summary 20 May 2020 meeting' and listen to minutes 1:43:05-1:47:27 of the recorded Livestream.</p>			

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		<p>The exposure draft was submitted for GSSB approval in its 20 May 2020 meeting.</p> <p>Ahead of this meeting, the Standards Division shared the exposure draft with the GSSB for their review by email on 6 May 2020. The GSSB members were asked to send any questions, concerns, or feedback on the exposure draft by email by 15 May 2020.</p> <p>The Standards Division addressed the questions and comments regarding the proposed changes to the Universal Standards shared by GSSB members prior to the meeting, and circulated a summary among GSSB members. Some comments had been addressed with a written explanation, others were open for discussion in the meeting, and some had prompted the Standards Division to propose additional changes to the exposure draft.</p> <p>The Standards Division presented the proposed changes to the exposure draft made in response to GSSB feedback during the May 2020 meeting, and invited further discussion from the GSSB. The Standards Division responded to the discussion points raised in the meeting and suggested to make some additional changes to the exposure draft before the launch of the public comment period.</p>	<p>Refer to lines 404-406 of the ‘GRI Universal Standards public comment – Explanatory memorandum for the exposure draft’.</p> <p>Refer to the cover page of ‘Item 02 – Exposure draft of Universal Standards: GRI 101, GRI 102, and GRI 103’.</p> <p>Refer to lines 57-61 of the ‘Summary 20 May 2020 meeting’ and the Evidence folder.</p> <p>Refer to lines 73-174 and 208-215 of the ‘Summary 20 May 2020 meeting’ and listen to minutes 08:40-1:33:19 of the recorded Livestream.</p>			

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	Para 15 (Voting on the approval of an exposure draft)	<p>Voting on the approval of the exposure draft</p> <p>The Standards Division presented the exposure draft of the GRI Universal Standards to the GSSB during its May 2020 meeting for approval. The GSSB approved 'Item 02 – Exposure draft of Universal Standards: GRI 101, GRI 102, and GRI 103' for public comment during that meeting.</p>	Refer to lines 175-184 of the ' Summary 20 May 2020 meeting ' and listen to minutes 1:34:17-1:35:30 of the recorded Livestream .			
Q1 2019, and Q2 and Q3 2020	<p>Interaction with the GRI Board and the GRI Stakeholder Council</p> <p>Para 16 (Interaction with the GRI Board during the development and finalization of a Standard)</p> <p>Para 17 (Comment sought from the GRI Board and the GRI SC on proposals to start new projects, and during development and finalization of a Standard)</p> <p>Para 18 and Para 19 (Consideration of comments from the</p>	<p>Proposal to start a new project</p> <p>The GRI Board and GRI Stakeholder Council were invited to comment on the draft project proposal for the review of the GRI Universal Standards. The GRI Board did not recommend any changes to the proposal. The GRI Stakeholder Council did not provide any specific feedback on the Universal Standards project. However, they did make a comment specifically in respect of human rights disclosures.</p> <p>Development and finalization of Standards</p> <p>The GRI Board and GRI Stakeholder Council were also invited to provide feedback on the exposure draft of GRI Universal Standards.</p> <p>The GRI Board and the GRI Stakeholder Council did not provide feedback during the public comment period.</p>	<p>Refer to the description on the cover page of 'Item 08 – Final Project Proposal for the Review of GRI's Universal Standards', lines 201-202 of the 'Summary 25-26 March 2019 meeting', lines 67-71 in 'Item 02 – Stakeholder Council response to the GSSB's Sector Standard Proposals and Proposal for Review of Universal Standards', and the Evidence folder.</p> <p>Refer to the Evidence folder for these items.</p>			

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	GRI Board and the GRI SC)					
Q2 and Q3 2020	<p>Public exposure</p> <p>Para 20 (Public exposure and explanatory memorandum)</p> <p>Para 21 (Exposure period)</p>	<p>The exposure draft of the Universal Standards: GRI 101, GRI 102, and GRI 103 was published for public comment on the GSSB website. Any interested party was able to submit comments on the exposure draft using an online public comment survey. The survey contained questions about the draft for stakeholders to respond to, and included a space for providing other comments.</p> <p>An explanatory memorandum was posted alongside the exposure draft. The explanatory memorandum set out the objectives for the review of the GRI Universal Standards, the significant proposals contained in the Universal Standards exposure draft, and a summary of the GSSB's involvement and views on the development of the exposure draft.</p> <p>The Standards Division proposed an exposure period of 90 days for the exposure draft of the GRI Universal Standards. The GSSB asked why the exposure period is longer than the minimum requirement of 60 days. The Standards Division explained that a 90-day public comment period would be appropriate for the following reasons:</p> <ul style="list-style-type: none"> • Give potential respondents the time to immerse themselves with the content and complete the survey questions, considering 	<p>Refer to 'GRI Universal Standards: GRI 101, GRI 102, and GRI 103 – Exposure draft' and the Evidence folder for screenshots of the website during the public comment period, and a copy of the exposure draft and the survey questions.</p> <p>Refer to 'GRI Universal Standards public comment – Explanatory memorandum for the exposure draft' and the Evidence folder for a copy of the explanatory memorandum.</p> <p>Refer to lines 194-195 of the 'Summary 20 May 2020 meeting' and listen to minutes 1:39:38-1:39:56 and 1:47:39-1:50:13 of the recorded Livestream.</p>			

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	Para 22 (Comments on the exposure draft are public)	<p>the large volume of content, and summer period in the northern hemisphere.</p> <ul style="list-style-type: none"> Have the opportunity to do more engagements over a sustained period. <p>The GSSB raised no further comments regarding the length of the exposure period.</p> <p>The public comment period ran from 11 June to 9 September 2020.</p> <p>Comments on the exposure draft</p> <p>Public comment feedback was posted on the GRI website, together with the name of the respondent, the organization, the country, and the stakeholder group. It is also indicated whether the representation is personal or organizational.</p>	The full set of public feedback for the public comment is available here .			
Q3 2020 to Q2 2021	<p>Consideration of respondents' comments on an exposure draft</p> <p>Para 23 (Analysis of comments on exposure draft)</p>	<p>The Standards Division reviewed and analyzed every comment made on the exposure draft.</p> <p>The draft version of the GSSB Basis for Conclusions for the public comment, with a summary of significant issues raised by respondents, and an explanation of why significant changes recommended by a respondent(s) were, or were not accepted, was shared with the GSSB in advance of its meeting on 10 June 2021.</p>	The draft version of the GSSB Basis for Conclusions for the public comment is available here .			

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	Para 24 (GSSB consideration of comments on exposure draft)	The Standards Division presented a summary of public feedback and resulting changes to the draft Universal Standards to the GSSB over the course of 11 meetings between October 2020 and April 2021. The GSSB provided directional advice to address the public comment feedback or changes to the draft Standards.	<p>Refer to:</p> <ul style="list-style-type: none"> lines 92-102 of the 'Summary of 22 October 2020 meeting' and listen to the recorded Livestream. lines 11-126 of the 'Summary of 5 November 2020 meeting' and listen to the recorded Livestream. lines 29-135 of the 'Summary of 19 November 2020 meeting' and listen to the recorded Livestream. lines 19-121 of the 'Summary of 3 December 2020 meeting' and listen to the recorded Livestream. lines 18-116 of the 'Summary of 10 December 2020 meeting' and listen to the recorded Livestream. lines 29-63 of the 'Summary of 21 January 2021 meeting' and listen to the recorded Livestream. lines 55-63 of the 'Summary of 25 February 2021 meeting' and listen to the recorded Livestream. lines xx-xx of the 'Summary of 04 March 2021 meeting' and listen to the recorded Livestream. lines xx-xx of the 'Summary of 23 March 2021 meeting' and listen to the recorded Livestream. lines xx-xx of the 'Summary of 25 March 2021 meeting' and listen to the recorded Livestream. 			

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			<ul style="list-style-type: none"> lines xx-xx of the 'Summary of 29 April 2021 meeting' and listen to the recorded Livestream. 			
Q2 2021	<p>Approval of Standard and consideration of the need for re-exposure</p> <p>Para 25 (Revised content of the exposed Standard)</p> <p>Para 26 (Advice of the Head of the Standards Division on due process)</p> <p>Para 27 (Voting on the approval of the final revised content of an exposed Standard)</p> <p>Para 28 (Voting on the need for re-exposure)</p>	Section to be finalised after the approval of the GRI Universal Standards				

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	<p>Para 29 (Explanatory memorandum accompanying the re-exposure draft)</p> <p>Para 30 (Effective date for the application of the final Standard)</p> <p>Para 31 (GSSB basis for conclusions)</p>					
Q2 2021	<p>Withdrawal of a Standard</p> <p>Para 32 (Withdrawal of a Standard)</p>	Section to be finalised after the approval of the GRI Universal Standards				
Q3 to Q4 2021	<p>Release of the final Standard</p> <p>Para 33 (Reporting on due process)</p> <p>Para 34 (Conclusion DPOC on due process)</p>	Section to be finalised after the approval of the GRI Universal Standards				