

Finnish Towards Sustainable Mining (TSM) Standard

**ASSESSMENT PROTOCOL**

**A Tool for Assessing Crisis Management Planning Performance**

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# Introduction

This document provides a tool for assisting companies in the site-level assessment of their current standard of crisis management at their facilities. The level of crisis management performance is monitored using three performance indicators in accordance with this assessment tool. It enables key performance indicators to be segregated, and performance improvements for each indicator to be tracked from year to year. The use of this protocol also enhances the consistency of crisis management performance assessments conducted across companies. In addition, the tool has been designed to enable the external verification of company performance.

# Assessing Crisis Management Planning Implementation

The purpose of the assessment protocol is to provide guidance – based on performance indicators – to companies in their planning and implementation of crisis management.

The assessment should:

* assist companies in developing their capacity to monitor and improve their performance
* provide a basis for the related auditing.

Professional judgement is required when assessing crisis management planning. The application of the assessment protocol of the Finnish TSM standard requires that the assessor have sufficient expertise in the practice of crisis management and management systems assessment. When carrying out an assessment, account must be taken of cooperation between the employer and employees. The assessment protocol of the Finnish TSM standard is not, in itself, a guarantee of crisis management preparedness, but can be used to measure performance levels. A self-assessment checklist is attached to the document (Appendix 2).

# Performance Indicators

Three performance indicators have been established for crisis management planning:

1. **Crisis management preparedness**

The company must have a crisis management plan in place.

1. **Internal review**

The company must regularly review and update its crisis management plan and the related practices and guidelines. These must meet the needs of the company, reflect the risks associated with the company’s operations and take account of best practices within the industry.

1. **Training and exercises**

The company organises crisis management training and a related exercise in order to annually test the functionality of the crisis management plan.

For each indicator, performance can be assessed as acceptable or unacceptable. The assessor must evaluate whether the performance of the company and its site meets the assessment criteria for the performance indicators, by providing a **Yes/No** answer to the questions presented in the self-assessment checklist. Wherever a performance element or performance indicator is irrelevant, the assessment given should be N/A.

# Corporate and Site-level Assessments

Companies are expected to complete an assessment of the performance indicators for crisis management for the company and for each site/facility. When planning the assessment, account must be taken of the organisational structure of mining operators, as international operators may have several organisational levels and groups involved in crisis management or companies may categorise their facilities and define their sites in various ways. This assessment protocol focuses on companies operating in Finland and their sites and facilities, in particular.

**Company:** Publicly listed company, Group, Division

**Site:** An individual mining area and/or mineral processing plant area. Can include both. Sites located in different locations (a mine and a processing plant located in two different locations) are assessed separately. The overall corporate crisis plan requires the establishment of site-specific Crisis Management Teams (CMT).

The protocol and performance indicators have been designed so that companies can assess the status of crisis management planning at both corporate and site levels. This approach enables companies to identify strengths and weaknesses within their organisations.

# Assessment Process

It is recommended that the assessment include interviews, discussions and document reviews. The assessment must include management, as well as production, safety and environmental personnel representing the company or site. A level of expertise in auditing and management systems assessment and some knowledge and experience of crisis management is required.

Where an operation is shared between two parties, e.g. a joint venture, the two parties are encouraged to discuss who should complete the assessment, and whether it should be undertaken jointly or divided up so that the results reflect the appropriate activities of each company.

# Structure of the Assessment Protocol

For each performance indicator, the assessment protocol provides:

* a statement of purpose that expresses the spirit and intent of the indicator
* assessment criteria for each level of performance (yes/no)
* supporting guidelines to help the assessor understand the general scope of each indicator and to act as a framework for reviewing documentation, and conducting interviews necessary for the assessment of the company’s or site’s performance
* Frequently Asked Questions (FAQs) that provide further information, such as definitions of key terms and answers to more commonly asked questions.

# Performance Indicator 1: Crisis Management Preparedness

**Purpose:**

To confirm that the company has a crisis management plan in place.

* Through interviews and the review of documentation, clarify the following issues:

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| **Performance Indicator 1**  **Crisis Management Preparedness**  **ASSESSMENT CRITERIA – CORPORATE** |
| The company management is committed to the development of crisis management planning. |
| The risks associated with the operations have been identified within the company. The company has established protocols and planned measures for risk management. |
| The results of risk assessments and risk management measures have been discussed and approved at corporate and site level. |
| A Corporate Crisis Management Team (CMT) has been established, with clearly defined roles and responsibilities. |
| A media spokesperson has been assigned and trained. |
| The Crisis Management Plan is a “page-dated”, controlled document that can only be modified by designated people. |
| All members of the Crisis Management Team have been provided with copies of the crisis management plan and a key contact list. |
| A crisis control centre has been established and equipped with the necessary communications and other equipment. |
| Contact information has been prepared for key authorities and stakeholders. |
| Key media contact log sheets have been prepared. |
| Crisis communications plans have been prepared for internal and external communications. |

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| **Performance Indicator 1**  **Crisis Management Preparedness**  **ASSESSMENT CRITERIA – SITE** |
| The risks associated with the operations have been identified at the site. The site has established protocols and planned measures for risk management. |
| The results of the risk assessments and risk management measures have been shared with the company management. |
| A Crisis Management Team (CMT) has been established at the site, with clearly defined roles and responsibilities. |
| A media spokesperson for the site has been assigned and trained. |
| The Crisis Management Plan of the site is a “page-dated”, controlled document that can only be modified by designated people. |
| All members of the Crisis Management Team have been provided with copies of the crisis management plan of the site and a key contact list. |
| A crisis control centre has been established at the site and equipped with the necessary communications and other equipment. |
| Contact information has been prepared for key authorities and stakeholders. |
| Key media contact log sheets have been prepared. |
| Crisis communications plans have been prepared for internal and external communications. |
| The site cooperates with senior members of the local emergency response authorities and meets with them regularly. |

**Crisis Management Preparedness**

**FREQUENTLY ASKED QUESTIONS**

|  |  |  |
| --- | --- | --- |
| **No. in APPX. 1.** | **FAQ** | **PAGE** |
| 1 | What is a crisis? | See page 8 |

# Performance Indicator 2: Internal Review

**Purpose:**

To confirm that the company regularly reviews and updates its crisis management plan and the related practices and guidelines. These must meet the needs of the company, reflect the risks associated with the company’s operations and take account of best practices within the industry.

* Through interviews and the review of documentation, clarify the following issues:

|  |
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| **Performance Indicator 2**  **Internal Review**  **ASSESSMENT CRITERIA – CORPORATE** |
| The Corporate Crisis Management Plan is regularly reviewed and updated:   * when there is a change of personnel involving those responsible for the implementation of the Crisis Management Plan; * when there is a significant change in business and/or production operations (e.g. a new mine, extension); * once a year when the safety and/or emergency response plans related to the operations are updated. |
| The Crisis Management Plan’s communications and notification system is tested at least twice a year. |
| New Crisis Management Team members are familiarised with the Crisis Management Plan within two months of joining the team; their training is recorded in the training register. |
| **Performance Indicator 2**  **Internal Review**  **ASSESSMENT CRITERIA – SITE** |
| The Crisis Management Plan of the site is regularly reviewed and updated:   * when there is a change of personnel involving those responsible for the implementation of the Crisis Management Plan; * once a year when the safety and/or emergency response plans related to the operations are updated. |
| The Crisis Management Plan’s communications and notification system is tested at least twice a year. |
| The Crisis Management Plan of the site is shared with the company. |
| New Crisis Management Team members are familiarised with the Crisis Management Plan within two months of joining the team; their training is recorded in the training register. |

# Performance Indicator 3: Training and Exercises

**Purpose:**

To confirm that the company organises crisis management training and a related exercise in order to annually test the functionality of the crisis management plan.

* Through interviews and the review of documentation, clarify the following issues:

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| **Performance Indicator 3**  **Training and Exercises**  **ASSESSMENT CRITERIA – CORPORATE** |
| The company organises a crisis management exercise annually to practise the operations of the Crisis Management Team and test the functionality of the Crisis Management Plan and the communications and notification system. |
| **Performance Indicator 3**  **Training and Exercises**  **ASSESSMENT CRITERIA – SITE** |
| The site organises a crisis management exercise annually to practise the operations of the Crisis Management Team and test the functionality of the local Crisis Management Plan and the communications and notification system.  A full crisis management exercise is conducted every three years together with local authorities and/or communities of interest. |

**Training and Exercises**

**FREQUENTLY ASKED QUESTIONS**

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| --- | --- | --- |
| **No. in APPX. 1.** | **FAQ** | **PAGE** |
| 1 | What is a crisis? | See page 8 |
| 2 | What is a crisis management exercise? | See page 9 |
| 3 | How do I assess a site with a new crisis management plan that has not yet completed a full crisis management exercise? | See page 9 |
| 4 | Can a real life crisis meet the requirement for a test of the crisis management plan? | See page 9 |

# Appendix 1. Frequently Asked Questions

1. **What is a crisis?**

A “crisis” is defined as a sudden event that may significantly affect the company’s ability to carry out its business.

It is important to distinguish between an emergency that can and should be handled by local management in accordance with its internal Emergency Response Plans, and a crisis that requires corporate, senior management involvement and action.

A crisis may exist or be developing if:

* + The emergency poses a significant threat to employees or local inhabitants
  + The emergency situation provokes government scrutiny
  + You no longer have full control of the situation – other agencies are taking charge
  + The situation has caused national or international media interest
  + The situation is likely to escalate and there is no immediate resolution in sight
  + The company’s reputation may be damaged or there is a threat to the bottom line or share value.

Incidents that are subject to crisis management may include:

* + **Industrial emergencies** such as accidents resulting in critical injury or property damage,

fire, building collapse, mine cave-ins, chemicals leak, flooding, explosions, power failure, freeze-up, loss of water.

* + **Natural disasters** such as flood, mud slide, heavy storm or wildfire which may jeopardise personal safety or commercial and production operations and severely disrupt routine commercial transportation and communications links with the affected locations.
  + **Medical emergencies** in areas where quality medical care is remote.
  + **Environmental releases** such as a tailings dam failure or major chemical spill which could significantly impact on the health and safety of affected people and/or the environment.
  + **Political and security risks** such as malicious damage, obstruction, vandalism, extortion, illegal threats (e.g. bomb threats, violence) and/or thefts.
  + **Any other unexpected event** which might threaten the safety of company or contractor employees or the local community or damage the reputation of the company as a responsible corporate citizen.

1. **What is a crisis management exercise?**

Crisis management exercises provide the crisis management team and other members of the organisation with an opportunity to practise and test their crisis management skills and preparedness to act in accordance with the plan. They also offer an opportunity to test the appropriateness and functionality of the plan in general, as well as that of the premises, the communications and notification system and other equipment reserved for crisis situations.

Crisis management exercises of various types and scopes can be conducted.

**Table-top or round-table exercise, simulation**

A table-top or round-table exercise is a useful, cost-effective tool for honing crisis management skills and for helping the crisis management team to identify any weaknesses or gaps in their crisis management planning.

Working from a schedule of events, a facilitator offers the crisis management team or management group a series of situations to be analysed and discussed before decisions are made and actions taken. The complexity and frequency of problems can be modified in response to the decisions made and actions taken by the team. The facilitation team raises issues from the perspective of outside audiences.

**Full crisis management exercise**

Where possible, a full crisis management exercise should be combined with an emergency response exercise conducted at the site, for example, in which case the crisis management team will respond to any information received from the scene of the emergency. Such exercises should also involve authorities and communities of interest, in such a manner that cooperation and communications can be practised with the actual partners.

1. **How do I assess a site with a new crisis management plan that has not yet completed a full crisis management exercise?**

A site with a new plan has three years in which to plan and carry out a full crisis management exercise. So long as the new plan has been tested through annual exercises, the assessor may respond “yes” to this performance indicator.

1. **Can a real life crisis meet the requirement for a test of the crisis management plan?**

Yes, a real life crisis can meet the requirement for a test of the crisis management plan if the plan was implemented in response to the crisis, and following the crisis the team met to review the plan’s implementation and identify lessons learned and the need for any modifications to the plan. The results of this review must be documented.

1. **Does an annual table-top exercise have to address the entire site?**

No, it is not a requirement that the annual table-top exercise address the entire site. Rather, one would expect that table-top exercises test different situations and different parts of the business so that, over time, the entire crisis management plan is tested and honed.

1. **How can a company with a corporate structure that stations its management staff all over the world fulfil the intent of the requirement to have a crisis control centre established and equipped?**

Recognising that a crisis control centre may not be appropriate for some corporate offices that are not centralised, a company can still attain a “yes” for Performance Indicator 1 if there is a formal process for bringing the corporate crisis management team together virtually, using technology.

**Definitions of Key Terms**

1. **What is a “system”?**

A “system”, or “management system”, represents processes that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively in order to achieve specified objectives and to drive continual improvement in performance.

A systems approach to management requires continual improvement of performance, planning in order to achieve the set objectives, the implementation of the plan, and a review of performance in meeting the objectives.

A management system also considers the necessary personnel, resource and documentation requirements. Other definitions associated with systems are:

**Practice:** Informal, undocumented approaches to carrying out a task.

**Procedure:** A formalised, documented description of how a task is to be carried out.

1. **What does “accountability” mean?**

**Accountability:** The crisis management planning system must identify the party that is ultimately answerable for crisis management performance and for the development and implementation of the crisis management planning system within the company and at the site. **Such accountability cannot be delegated.**

Resources are available to the accountable party to ensure that the proper systems (training, equipment, communications, etc.) are in place for effectively meeting their crisis management goals.

1. **What does “responsibility” mean?**

**Responsibility:** Within the crisis management planning system, specific crisis management related requirements and tasks are identified and assigned to specific positions within the site. It is important that responsibilities are clearly communicated so that the person in each position understands what is expected of him or her.

# Appendix 2. Self-assessment Checklist

**Crisis Management Planning – Corporate**

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| **Site:** |  | **Company:** |  |
| **Assessed by:** |  | **Date submitted:** |  |

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| **SUPPORTING DOCUMENTATION/EVIDENCE:** | |
| **NAME OF DOCUMENT** | **LOCATION** |
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| **Interviewees:** | | | |
| **NAME** | **POSITION** | **NAME** | **POSITION** |
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| **Question** | | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 1: CRISIS MANAGEMENT PREPAREDNESS** | | | | | |
| **INDICATOR 1** | Has the company management demonstrated support for the development of crisis management planning? |  |  |  |  |
| Have the risks associated with the operations been identified within the company? Has the company established protocols and planned measures for risk management? |  |  |  |  |
| Have the results of risk assessments and risk management measures been discussed and approved at corporate and site levels? |  |  |  |  |
| Has a Corporate Crisis Management Team (CMT) been established, with clearly defined roles and responsibilities? |  |  |  |  |
| Has a media spokesperson been assigned and trained? |  |  |  |  |
| Is the Crisis Management Plan a “page-dated”, controlled document that can only be modified by designated people? |  |  |  |  |
| Have all members of the Crisis Management Team been provided with copies of the crisis management plan and a key contact list? |  |  |  |  |
| Has a crisis control centre been established and equipped with the necessary communications and other equipment? |  |  |  |  |
| Has contact information been prepared for key authorities and stakeholders? |  |  |  |  |
| Have key media contact log sheets been prepared? |  |  |  |  |
| Have crisis communications plans been prepared for internal and external communications? |  |  |  |  |
| *If you have answered “Yes” to all of the questions, assign a “Yes” for this indicator. Otherwise, assign a “No”.* | | | | |
|  | **ASSESSED CORPORATE PERFORMANCE FOR INDICATOR 1** | | | | **Y / N:** |

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| **Question** | | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2: INTERNAL REVIEW** | | | | | |
| **INDICATOR 2** | Is the Corporate Crisis Management Plan regularly reviewed and updated:   * when there is a change of personnel involving those responsible for the implementation of the Crisis Management Plan? * when there is a significant change in business and/or production operations (e.g. a new mine, extension)? * once a year when the safety and/or emergency response plans related to the operations are updated? |  |  |  |  |
| Is the Crisis Management Plan’s communications and notification system tested at least twice a year? |  |  |  |  |
| Are new Crisis Management Team members familiarised with the Crisis Management Plan within two months of joining the team, and is their training recorded in the training register? |  |  |  |  |
| *If you have answered “Yes” to all of the questions, assign a “Yes” for this indicator. Otherwise, assign a “No”.* | | | | |
|  | **ASSESSED CORPORATE PERFORMANCE FOR INDICATOR 2** | | | | **Y / N:** |

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| --- | --- | --- | --- | --- | --- |
| **Question** | | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 3: TRAINING AND EXERCISES** | | | | | |
| **INDICATOR 3** | Does the company organise a crisis management exercise annually to practise the operations of the Crisis Management Team and test the functionality of the Crisis Management Plan and the communications and notification system? |  |  |  |  |
| *If you have answered “Yes” to this question, assign a “Yes” for this indicator. Otherwise, assign a “No”.* | | | | |
|  | **ASSESSED CORPORATE PERFORMANCE FOR INDICATOR 3** | | | | **Y / N:** |

**Crisis Management Planning – Site**

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| **Site:** |  | **Company:** |  |
| **Assessed by:** |  | **Date submitted:** |  |

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| **SUPPORTING DOCUMENTATION/EVIDENCE:** | |
| **NAME OF DOCUMENT** | **LOCATION** |
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| **Interviewees:** | | | |
| **NAME** | **POSITION** | **NAME** | **POSITION** |
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| **Question** | | **Y** | **N** | **NA** | **Description & Evidence** |
| --- | --- | --- | --- | --- | --- |
| **INDICATOR 1: CRISIS MANAGEMENT PREPAREDNESS** | | | | | |
| **INDICATOR 1** | Have the risks associated with the operations been identified at the site? Has the site established protocols and planned measures for risk management? |  |  |  |  |
| Have the results of the risk assessments and risk management measures been shared with the company management? |  |  |  |  |
| Has a Crisis Management Team (CMT) been established at the site, with clearly defined roles and responsibilities? |  |  |  |  |
| Has a media spokesperson for the site been assigned and trained? |  |  |  |  |
| Is the Crisis Management Plan of the site a “page-dated”, controlled document that can only be modified by designated people? |  |  |  |  |
| Have all members of the Crisis Management Team been provided with copies of the crisis management plan of the site and a key contact list? |  |  |  |  |
| Has a crisis control centre been established at the site and equipped with the necessary communications and other equipment? |  |  |  |  |
| Has contact information been prepared for key authorities and stakeholders? |  |  |  |  |
| Have key media contact log sheets been prepared? |  |  |  |  |
| Have crisis communications plans been prepared for internal and external communications? |  |  |  |  |
| Does the site cooperate with senior members of the local emergency response authorities and meet with them regularly? |  |  |  |  |
| *If you have answered “Yes” to all of the questions, assign a “Yes” for this indicator. Otherwise, assign a “No”.* | | | | |
|  | **ASSESSED SITE PERFORMANCE FOR INDICATOR 1** | | | | **Y / N:** |

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| --- | --- | --- | --- | --- | --- |
| **Question** | | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2: INTERNAL REVIEW** | | | | | |
| **INDICATOR 2** | Is the Crisis Management Plan of the site regularly reviewed and updated:   * when there is a change of personnel involving those responsible for the implementation of the Crisis Management Plan? * once a year when the safety and/or emergency response plans related to the operations are updated? |  |  |  |  |
| Is the Crisis Management Plan’s communications and notification system tested at least twice a year? |  |  |  |  |
| Is the Crisis Management Plan of the site shared with the company? |  |  |  |  |
| Are new Crisis Management Team members familiarised with the Crisis Management Plan within two months of joining the team, and is their training recorded in the training register? |  |  |  |  |
| *If you have answered “Yes” to all of the questions, assign a “Yes” for this indicator. Otherwise, assign a “No”.* | | | | |
|  | **ASSESSED SITE PERFORMANCE FOR INDICATOR 2** | | | | **Y / N:** |

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| --- | --- | --- | --- | --- | --- |
| **Question** | | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 3: TRAINING AND EXERCISES** | | | | | |
| **INDICATOR 3** | Does the site organise a crisis management exercise annually to practise the operations of the Crisis Management Team and test the functionality of the local Crisis Management Plan and the communications and notification system? |  |  |  |  |
| Is a full crisis management exercise conducted every three years together with local authorities and/or communities of interest? |  |  |  |  |
| *If you have answered “Yes” to this question, assign a “Yes” for this indicator. Otherwise, assign a “No”.* | | | | |
|  | **ASSESSED SITE PERFORMANCE FOR INDICATOR 3** | | | | **Y / N:** |