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Anna, Bahtiar

I have reviewed the Developing Global Standards Discussion Paper. As I have been closely involved with the development of several standards, including the GRI, ISO 26000 and AA1000, I hope you will consider my views.

The paper is extremely well constructed and the overall approach is very clear.

However there is one major omission that should be considered during the current consultations. This is the proposed governance of the standards when they are launched. While the process for the development of the standards looks as though it will be appropriately multi-stakeholder, the ultimate credibility of the standards is going to depend on the organisational arrangements and processes for the formal involvement of a wide spectrum of stakeholders in their on-going governance. This should therefore be explicitly included in consultations at this stage – not only to consider what the best approach might be but also to ensure that that approach is acceptable to the stakeholders that have contributed to the form and content of the standards.

There are several other matters that should also be taken into account:

- the nature of indicators used to assess actual HR impacts is a crucial and difficult area. I am glad to see that it will figure to some extent in the development of the standard. The consultation process should deliberately seek views on how these indicators can best be formulated
- the treatment of the independence of assurance providers should be considered in more detail than seems to be proposed. The degree to which assurance provider independence is achievable is dependent to some degree on the operational model of the final reporting standard and its assurance. For instance if the assurance is to be left to market forces and paid for by each company, then the independence of the provider will always be in doubt to some extent. It may be more helpful to use the concept of 'impartiality towards stakeholders' in addition to that of independence.

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