Community relations management systems in the minerals industry: combining conventional and stakeholder-driven approaches

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Abstract: As part of a broader commitment to corporate social responsibility and sustainable development, major minerals companies are developing and implementing a management systems approach to community relations. While the application of management systems to community relations represents an advance over more traditional approaches to dealing with community issues, limitations of the systems paradigm need to be acknowledged. This paper explores some of these limitations, as well as offering a way forward that involves incorporating elements of the conventional management systems model into a more externally focused, stakeholder-driven and values-based approach. Implementing the ‘hybrid’ approach presents minerals companies with significant challenges and will require them to make a substantial investment in organisational capacity building. Companies will also have to be prepared to re-visit how they engage with external stakeholders and to contemplate greater external involvement in planning and performance review processes.

Keywords: community; corporate social responsibility; management systems; minerals; policy; self regulation; stakeholder engagement; sustainable development.

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1 Introduction

There is no question that the mainstream minerals industry has now embraced, at least in principle, the notion of corporate social responsibility (CSR) – used here in its broadest sense to incorporate concepts of sustainable development, corporate social responsibility and corporate citizenship. Whether this shift in emphasis has been primarily driven by straightforward business imperatives, ethical considerations or some form of ‘enlightened self interest’ (Post and Berman, 2002, p.67) remains a matter for ongoing discussion. However, it is now generally not at issue that the industry has changed its approach, at least at the level of policy, language and organisational processes. Evidence of this new approach includes: the completion of the Mining Minerals and Sustainable Development (MMSD) process in 2002; the subsequent release of the International Council on Mining and Metals’ sustainable development principles (International Council on Mining and Metals, 2005); similar initiatives by national bodies such as the Minerals Council of Australia (2005); and the development and ongoing refinement by both large and small to medium-sized minerals companies of corporate responsibility policy frameworks, incorporating key aspects of international standards and guidelines.

Most of the larger minerals companies have had environmental policies and management frameworks in place for some time, but these are now being strengthened and expanded in response to a plethora of emerging global frameworks for corporate responsibility. This is in line with trends in other sectors such as tourism, chemical manufacture, agriculture and pharmaceuticals. Typically, corporate policies in the minerals industry now explicitly address a range of broader social justice objectives, including such aspects as local and indigenous employment, security and human rights,
sustainable livelihoods, culture and heritage, social impact assessment, ethical procurement and stakeholder and/or community consultation. Increasingly, these policies are focused not only on mitigating the negative impacts of mining on the environment and people, but also on delivering sustainable benefits for local, regional and even global communities. At the level of process, there is a growing emphasis on the need to adopt a more participatory and inclusive approach to interacting with stakeholders, including local communities.

Although minerals companies have made considerable progress at the level of policy and language, translating these policy commitments into improved practices at the site level remains one of the industry’s toughest challenges (AccountAbility and Business for Social Responsibility, 2004; Boele, 2001; Brereton, 2003a; Brereton and Forbes, 2004; Kemp, 2003). Historically, the community relations function has been marginalised and under-resourced, especially in comparison to production-related functions. Community relations has often been equated with public relations, in which organisational self-promotion and protection, rather than community development and engagement, have been seen as the primary goals. Community issues have also typically been dealt with in a reactive, ad hoc manner, rather than as part of a broader strategy.

In an effort to improve their ‘on-the-ground’ performance in community relations, some minerals companies are now investing considerable resources in developing and implementing management systems for community relations. This entails an extension of the approach being taken in other dimensions of sustainable development, such as occupational health and safety (OH&S) and environmental management (Harvey and Brereton, 2005). As described in more detail below, the elements of these systems typically include an annual planning process, detailed documentation of procedures, regular reviews and audits against defined corporate standards, and a strong focus on information management.

The extension of the management systems approach to the community sphere represents a significant change in approach, and raises some important policy questions. The standard systems approach is very process-oriented, as exemplified by the ‘Plan Do Check Act’ cycle, often called the Deming cycle, which establishes a continuous feedback loop for managers to identify and change the parts of the process that needs improvement (Tague, 2004). This conventional approach works well for standardised production processes and routine activities, but may be problematic when applied to the fluid and often conflictual world of community relations. Also, while the adoption of management systems may lead to greater internal efficiencies, this does not necessarily translate into better outcomes for consumers and other external stakeholders (Ferguson, 2004).

This article aims to encourage deeper reflection and further discussion about the utility of applying management systems thinking to the sphere of community relations. The analysis draws on our direct involvement and experience across a wide range of consulting and research projects within the minerals industry concerning the management of community relations at the operating level. This experience extends to minerals operations in Africa, Asia and the Pacific, North and South America, and Australia and New Zealand. Drawing on this experience, we argue that the move to systematise the community relations function at the site level has had a number of benefits, but also some potential drawbacks. Unless these tensions are understood and addressed, minerals companies will find it difficult to further the objectives of sustainable development ‘on the ground’. In the final part of the article, we suggest a possible path forward that
combines elements of the conventional systems approach, which is inward looking and mainly oriented towards managing operational aspects and associated technical issues, with a more externally focused, stakeholder-driven, model.

2 What makes community relations challenging?

There have been, and continue to be, well documented impacts on the environment and local communities as a result of mining activities, some positive and some negative. At a local level, communities may benefit from mining through direct compensation, royalties, equity participation in joint ventures (O’Farcheallaigh, 2002), direct and indirect employment, business opportunities, skills transfer, enhanced services, such as in health and education, and improved infrastructure (Oxfam Community Aid Abroad, 2000–1). However, Oxfam (2004) and others, such as Madeley (1999), also highlight that the advent of a mining operation and its inevitable closure can have significant adverse effects, such as infringing on human rights, particularly indigenous rights regarding access to land and impacts on traditional culture, heritage and livelihoods. In addition, mining can negatively affect minority groups, induce inflation, prompt an influx of newcomers and migrant workers, and disrupt traditional social structures. Further, it has been argued that some positive benefits can in the end become negative. For example, compensation payments can in themselves be a major cause of social conflict, particularly in traditional communities that lack mechanisms for equitable distribution. Others refer to the ‘mining curse’, citing evidence that an over-reliance on mining severely limits a nation’s ability to sustain economic growth (Mines and Communities, 2005), although this relates more to the macroeconomic consequences of a dependence on mining than the local impacts associated with specific operations.

Whether the impacts of mining are positive and/or negative depends, to a considerable extent, on the local context. Communities differ significantly from each other in terms of such factors as their degree of cohesiveness, social and political structures and processes, cultural norms, economic well-being, strength and diversity of human capital, degree of prior experience with and knowledge of mining, and their expectations of what projects can and will deliver. Because community impacts of mining are often context specific, learning from one operation may not necessarily apply to another, even in the same country. The scale and nature of impacts – and opportunities – can also vary depending on the stage of an operation’s life cycle (for example, whether it is in start-up or closure mode). These factors limit the ability of the industry to transfer knowledge at a practical level, and make managing the social dimensions of mining highly complex.

A recently completed study of community relations practitioners in Australia and New Zealand confirmed the complex and at times contradictory nature of community relations work (Kemp, 2004, 2006). Common challenges identified in the study included: balancing different priorities, tailoring corporate policies to divergent local circumstances, understanding complex community dynamics, and dealing with the industry’s historically poor public image. Organisation-level challenges included dealing with internal politics, coping with limited support from middle management, securing sufficient human and financial resources to support the community relations function, limited understanding of community relations work by others, and not being perceived as ‘professional’ by workplace colleagues.
Increasingly, community relations work is conducted under the glare of scrutiny from regulators, community groups, international NGOs and the media. In contrast to other industries (such as manufacturing), which have a high degree of geographic mobility, minerals companies are bound to operate in those areas where the resources are located. This means that host communities are often in a position to disrupt and even halt operations if they feel they are being impacted negatively. Support from international NGOs and other social movements has encouraged local mobilisation and global networking of communities (Edwards and Gaventa, 2001). From a mining industry perspective, the NGO sector is better organised, more politically sophisticated and more influential than ever before (Brereton, 2003b).

3 Factors driving development of community relations management systems

At a site level, management systems represent a form of industry self-regulation; that is, they are non-legislative, voluntary internal control mechanisms for improving and maintaining performance. From the 1990s, minerals companies have embraced management systems across several aspects of sustainable development, such as Occupational Health and Safety through OHSAS 18001, environment through the International Standards Organisation (ISO) 14001, and also quality, or total quality management (TQM), through the ISO 9000 series. These systems have been applied to ensure continuous performance in these areas, wherever operations are located. Given the widespread application of management systems within the minerals industry, either as a general framework and/or for the purposes of certification, it is not surprising that there is increasing interest and application of management systems to community relations. In the minerals industry it appears a ‘natural’ extension of an already well-established approach. There are also several other drivers pushing companies in this direction.

Development and application of management systems to community relations is also a response to the growing challenges minerals companies face in achieving and maintaining a social licence, or freedom, to operate. Social licence is variously defined but is commonly considered an ongoing process of approval from the community that is given at a point in time but not necessarily for the future (AccountAbility and Business for Social Responsibility, 2004). It is now widely recognised that minerals companies face significant risk if they operate without the consent of affected communities (Brereton and Forbes, 2004; Business for Social Responsibility, 2003; Humphreys, 2000).

Obtaining and maintaining a social licence to operate from local communities and other stakeholders requires consistent performance. For global companies, poor social performance at one site can affect the attainment of a social licence at another. The management systems approach is attractive, in part, because it provides a mechanism for defining minimum standards and monitoring performance against those standards. Systems also help to maintain consistency within operations over time. For example, they provide a level of institutional memory, such that commitments made by key personnel at a particular point in time, such as during exploration, are captured and managed appropriately for the entire life cycle of an operation, instead of that information being lost when individuals leave or the operation moves on in its life cycle.
There are also emerging norms that lend support to a management systems approach in corporate responsibility and community relations. For example, SA 8000 is a social accountability system for organisations to maintain just and decent working conditions throughout the supply chain. Certification to SA 8000 has only recently become available to the extractives industry, and the standard is often cited as a reference in the development of corporate responsibility-type standards. ISO is also looking to finalise and release a guideline on corporate social responsibility in 2006. The AA1000 Stakeholder Engagement Standard provides guidance on designing, implementing, communicating and assuring stakeholder engagement. This is one of the only standards dealing with the quality of stakeholder interaction. The Voluntary Principles on Security and Human Rights are issue-specific, and require a level of systems to be established in order to manage specific requirements such as human rights training. With a plethora of other guidelines in the broad area of corporate responsibility, it appears possible to standardise and systematise some of the management requirements for community relations wherever a company operates, and whatever the stage of the operation.

Another important development has been the emergence – and growing influence of – socially responsible investment (SRI) funds, other indexes such as the Dow Jones Sustainability Index, and public ratings, such as the Corporate Responsibility Index in Australia. Most SRI funds, indexes and rating agencies require that organisations establish a systematic approach to managing the social dimensions of corporate responsibility, as they would environment and economic aspects. Many funding agencies, such as the International Finance Corporation (IFC), also require evidence of a systematic approach in the area of corporate responsibility as a condition of finance. Non-government organisations (NGOs) likewise see the development and implementation of management systems for community relations as imperative (Oxfam Community Aid Abroad, 2004). In the absence of mandatory legislation across many of the social dimensions of corporate responsibility, pressure from third parties, such those mentioned above, is proving to be a significant driver of change in the minerals sector, particularly for companies that are publicly listed.

Critical thinkers in the area of CSR have called for the corporate sector more broadly to develop and refine its approach to managing the social dimensions of their business. For example, Zadek (2001) supports the notion of ‘civil navigation’, emphasising the importance of a systematic approach. He notes there is no use re-inventing the wheel when there are practical tools that have already proved helpful, such as management systems, but that it is not a matter of cut-and-paste for CSR. In a similar vein, in this paper, we argue for modification and extension, rather than direct application of, the conventional management systems approach employed in other disciplines.

4 Current approaches in the minerals industry

In responding to the various drivers described above, some minerals companies have developed integrated systems frameworks for sustainable development where health and safety, environment and community relations are subject to the same management system approach, using the same processes, procedures and terminology and methods for assessment. Castka et al. (2004) cite other management scholars and practitioners, such as Karapetrovic (2003), who advocate such a single business
management system. The more common response, however, has been for companies to develop parallel management systems for community relations, largely using conventional approaches, rather than a fully integrated model.

Some companies have adopted a process-based system whereas others have also sought to incorporate performance aspects, taking their cues from international frameworks and other social norms. Corporate offices often set these performance standards, but some companies now require local stakeholder expectations to be taken into account when formulating these standards, thereby incorporating important perception aspects. An example of this is the socio-economic assessment toolbox (SEAT) developed by the Anglo American, a large multinational mining company. SEAT sets out a process to assist operations identify and manage their social and economic impacts, both positive and negative. A strong emphasis is placed on engaging with community stakeholders throughout the process and reporting back to them at the conclusion. There is an expectation that all Anglo American sites will complete an initial SEAT review and repeat the exercise at regular intervals. The incorporation of stakeholder expectations reflects an extension of the conventional management systems approach where the focus is primarily internal. Others have already outlined an approach that incorporates external perceptions; for example, Castka et al. (2004) propose a process-based CSR management system model which, while being compatible with ISO 9000, does not include performance requirements.

It is also possible to distinguish what could be deemed a ‘cultural’ response as compared to a ‘prescriptive’ approach to managing community relations. A cultural response is based more on high-level ‘macro’ principles and values, relying on site-level initiative and innovation to apply management systems in context-specific situations. In contrast, a prescriptive response is based on highly detailed standards that require ‘micro’ compliance. Some companies are working to incorporate both approaches, but the balance is currently more towards the prescriptive than the cultural end of the scale.

The other difference between companies in their approach to management systems is in the area of auditing and assessment. Some companies use internal auditing departments and/or personnel from other sites (e.g. community relations managers) to assess compliance with corporate and/or stakeholder requirements. Others rely on sites to self-assess their own performance and report back to the corporate office. A third approach is to use independent and/or external assessors. Some companies use a combination of these approaches.

Most of the larger minerals companies produce public documents, such as sustainability reports, describing their management systems and supporting standards and principles. The following outlines and summarises the general approach and key management elements taken by BHP Billiton, Newmont Mining and Rio Tinto. High-level policies and/or Charters that make strong commitments to corporate responsibility underpin all three systems.

At BHP Billiton, health, safety, environment and community relations (HSEC) standards form the basis for the development and application of the management systems. In the area of community, the standards emphasise internal engagement with employees and contractors, external engagement with people affected by operations, and human rights. Each site is required to develop and regularly update a Community Relations Plan that addresses the social and community elements of the HSEC standards. Central to the Management Standards is a requirement for an auditing process to check application
and verify performance, supported by an Audit and Self-Assessment Protocol. Within BHP Billiton, self-assessments are undertaken annually and an audit every 3 years. Internal auditors are used for this process, although some external parties have been involved.

Newmont Mining’s approach has been to establish global standards for building systems that support community relations as well as standards for key community relations global risk areas, such as management of heritage sites, indigenous employment and business support and social impact assessment. There are 18 management system standards that are common for health, safety and loss prevention, environment and community and external relations. Each of these areas has ‘discipline specific standards’, 14 in the case of community and external relations, which are applicable to each operating site within the Newmont group. Each standard is supported, in turn, by Guidelines. Every year, all Newmont operations are assessed against these standards using five level criteria, giving the process the title *Five Star Management System*. There are a number of unique elements to the Newmont Five Star process, including the use of assessors external to the company to conduct annual assessments.

The systems framework adopted by Rio Tinto include: a set of overarching values-based principles, called *The Way We Work*; a communities standard supported by specific guidelines, which describes a minimum set of policy implementation requirements; a requirement for all operations to have in place a rolling Five Year Community Plan and to report on performance against this plan, a corporate assurance and reporting system that provides a means of reviewing that operations are actually doing what they say they do; and a set of community relations competencies for operational staff and communities professionals within the Group (Harvey and Brereton, 2005).

5 Conventional management systems: challenges for community relations

As mentioned above, a conventional approach to management systems enables organisations to improve their performance through a process of continuous improvement. Deming’s ‘Plan Do Check Act’ cycle focused on industrial production processes, and the level of improvements sought were internal. Clearly, aspects of a business that relate to sustainable development, such as community relations, extend beyond production and relate not only to internal processes, but also to the external environment. A conventional approach to management systems, with its linear run around the Plan Do Check Act cycle, is limited in terms of community relations because of the need to consider external aspects, not only during the planning stage, but at each of the stages.

In the minerals industry, the application of conventional management systems is typically tied to a focus on ‘risk’ as the fundamental organising element of the system. This means that operations are increasingly considering social risk alongside traditional business risks (Kytle and Ruggie, 2005). While there is some way to go in terms of risk assessment techniques in the social area, the application of management systems has helped elevate social considerations. However, a risk focus does not necessarily assist an operation identify and maximise community development opportunities that are unrelated to specific, current risks, or pre-emptive actions that would reduce future extreme risks.
(for example, by building up a reservoir of community goodwill). Opportunities tied to risk are obvious, but those that cannot be so linked may be overlooked, despite long-term advantages. The other issue is that many operations do not seek external input in the risk assessment and ranking process. Assessments that rely solely on internal processes rather than also incorporating external perspectives are clearly inadequate for the purposes of identifying social risks and opportunities.

Zwetsloot (2003) has argued that traditional management systems, which concentrate on rational control, that is, doing things right, are of only limited value in terms of CSR. He contends that the values-based focus of doing the right things is also important. Zwetsloot advocates for a new generation of management systems that consider both aspects, as well as the important principles of continuous improvement and innovation, and argues that CSR provides an important trigger for the development of such systems. Zwetsloot’s approach is consistent with our view that conventional management systems thinking, with its internal focus and rational approach, needs to be balanced with value-based decision making, a supportive organisational culture, and externally-focussed stakeholder-driven orientation. Management systems are useful in community relations to a point; after that, there is the potential that they have perverse impacts, such as an overemphasis on control, rather than flexibility and innovation.

A final observation is that effective community relations depends heavily on building and maintaining trust and mutual understanding between a mining operation and its key community stakeholders. Management systems can reduce the risk of mistrust and misunderstanding by, for example, ensuring that issues are identified and addressed in a timely manner, that there is prompt follow-up on undertakings and that there is a degree of consistency in how the operation communicates with external stakeholders. However, levels of trust and understanding, particularly at the local level, are also shaped to a considerable extent by the quality of personal relations and how individuals perceive each other. If company representatives are regarded with suspicion by key community members and cannot communicate effectively with them, it will matter little that the company has ‘good’ management systems in place.

6 A way forward

Building on the preceding discussion, we would argue that a well-designed community relations management process needs to incorporate three key elements: systems, performance and, importantly, community perceptions. Conventional management systems emphasise the first aspect, but a triangulated model enables operations to manage responsively across three dimensions. For instance, within the Newmont Five Star process, assessors of the community and external relations discipline are required to assess sites across each of these dimensions. Taking as an example the discipline specific standard of ‘Management of Heritage Sites’, assessors must: examine the extent to which the systems for managing and protecting sites are implemented and functional; identify whether the system is performing and in terms of any unauthorised disturbances; and finally, assess the community perception of performance. Such an approach is necessary to deliver the level of confidence sought not only by minerals operations but also other stakeholders, such as the local community.
Secondly, we advocate moving from the traditional risk-dominated model to a more balanced approach, which focuses on opportunities as well as risks and also incorporates a relationship focus. Stakeholder relationships are absolutely paramount, and they should be the primary orientation of community relations management systems; without them, social and community relations risks cannot be fully understood, analysed nor responded to adequately. This is in contrast to the typical environmental management system, which is mainly orientated towards managing operational aspects (e.g. water flow and quality, emissions, land rehabilitation) and associated technical issues.

Thirdly, if it is accepted that relationships are paramount, it follows that there should also be some form of stakeholder involvement in evaluating the functionality of the community relations management system and reviewing performance outcomes; this is regardless of whether this is done as part of a self-assessment by an operation or through an external audit. We acknowledge that there may be some practical constraints to the level of engagement that can be achieved with non-industry personnel, many of who may have only a limited understanding of management systems. Figure 1 illustrates the triangulated model for community relations management systems, with stakeholder involvement the core element.

Figure 1  Triangulated model for community relations management systems

Fourthly, there needs to be a balance struck between the cultural and prescriptive approaches to governing organisational behaviour. The more prescriptive approach can promote a narrowly-focussed technocratic compliance mentality rather than a holistic perspective on managing community relations (Lund, 2004). Conversely, a purely cultural approach (that is, one that focuses on enabling personnel to do the right things) may overlook the transactional aspects of community relations, such as what has been
promised, and delivered, to stakeholders. A focus on detail is required for retaining institutional memory and is critical to building and retaining trust, particularly in an era when high turnover characterises the industry. The challenge, therefore, is to design systems which support, rather than undermine, the development and maintenance of a strong and positive culture.

Fifthly, we would caution against fully integrating the community relations functions into an organisation-wide management system. While a one-size-fits-all model may sound streamlined and workable at a higher level, when it comes to community relations on the ground in an operational setting, a more nuanced and flexible approach is often needed, particularly if performance and perception aspects are going to be considered and site-specific social dimensions adequately accounted for. Furthermore, a one-size-fits-all approach does not take into account the need for the community relations discipline to develop its own language around systems. For example, instead of the terminology ‘corrective and preventative action’ used in OHS and environment, the words ‘responsive and proactive relations’ may be more appropriate. Similarly, instead of ‘incidents’, reference to ‘complaints’ or ‘community feedback’ may be more meaningful. Whatever form the system takes, it should leave room for the community relations discipline to develop an identity and meaningful language of its own.

Sixthly, it is important to remember that most minerals operations are not starting from scratch when it comes to the development of a community relations management system. In fact, fundamental aspects are already in place at many minerals operations for example, stakeholder registers, social impact studies, complaint/feedback mechanisms and reviews of community relations programmes. However, viewed from a systemic perspective, these elements must be linked so that it can be seen how they relate to each other within the system. Linking helps to determine whether current processes are sufficient to ensure adequate stakeholder engagement, continuous improvement and innovation. This needs to be done having regard to the full life cycle of a project: from exploration and project development, right through to operations and finally closure.

A final observation concerns the importance of building organisational capacity to support the approach outlined here. In addition to devoting more resources to the general professional development of community relations workers in the minerals industry (Kemp, 2004) there needs to be a specific focus on providing community relations personnel with the skills and knowledge to operate effectively in a management systems environment. Personnel such as those working in production, environment or OH&S, have the advantage of having management systems embedded across many aspects their work, but for those working exclusively or mainly in community relations, this can be a new and unfamiliar approach. For the same reason, corporate offices must be careful not to design voluntary regulation and management systems frameworks whose sophistication exceeds the ability of the personnel responsible for applying them. Unless priority is given to internal capacity building and knowledge development, the current focus on voluntary regulation and associated management systems is unlikely to deliver significant improvements in corporate social performance. Table 1 provides a summary of the key points discussed above.
7 Conclusion

The recent shift by major minerals companies to develop and implement a management systems approach to community relations is a significant development. This constitutes recognition by the industry of the importance of the community relations function and the need to take action to stave off potential threats to the industry’s ‘social licence to operate’. However, while this emerging model represents a significant advance over the more traditional approaches to dealing with community issues, the limitations of the systems paradigm also need to be acknowledged. Conventional management systems approaches are very much inward looking and process focused, prioritise the management of risks over the pursuit of opportunities, and tend to encourage a compliance mentality rather than values driven behaviour. The language of management systems is also often not well suited to the fluid and personalised sphere of community relations.

In this short paper we have outlined a way forward which involves incorporating elements of the conventional management systems model into a more externally-focused, stakeholder-driven and values-based approach. Implementing this ‘hybrid’ approach will present minerals companies with some significant challenges and will require them to make a substantial investment in organisational capacity building, particularly by developing the skills and knowledge of community relations personnel. Companies will also have to be prepared to re-visit how they engage with external stakeholders and to contemplate greater external involvement in planning and performance review processes. Not all companies will be prepared to accept these challenges, but those that do will be well placed to derive a long-term strategic benefit.

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<th>Model</th>
<th>Conventional: systems</th>
<th>Hybrid: systems, performance and perceptions</th>
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<tr>
<td>Orientation</td>
<td>Risk</td>
<td>Risk, opportunity and relationship</td>
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<td>Process</td>
<td>Internal</td>
<td>Internal and external (including stakeholder involvement)</td>
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<td>Focus</td>
<td>Compliance</td>
<td>Balance between culture and prescription</td>
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<td>Fit</td>
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<td></td>
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<td>Develop appropriate language and terminology</td>
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<td>Link existing CRMS elements</td>
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<td></td>
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<td>Build systems capacity of key personnel</td>
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References


Community relations management systems in the minerals industry


Notes

1 Minerals ‘sites’ or ‘operations’ include open cut, strip or underground mines, drilling operations, processing and/or transportation facilities, or other form of plant, equipment and/or infrastructure involved in minerals extraction or processing.

2 It must be noted that while the term ‘company’ is used, some sites have independently developed management systems also.