



# Grievance Mechanism Template

As part of the Environmental & Social Management System (ESMS)

**Version 1.0**  
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## Grievance Mechanism Template

### Introduction

This document is a Grievance Mechanism Template. The Foundation will use it as its institutional Grievance Mechanism. Also, the Offset Partners can use it to develop their own Grievance Mechanism – or to prepare it in a different format but achieving the same objectives.

Each Offset Partner seeks to build strong relationships with stakeholders and manage the impacts of their project activities on affected communities. Nevertheless, they recognise that complaints about the activities may occur from time to time. Therefore, the Offset Partner will develop a Grievance Mechanism.

### Purpose

The Grievance Mechanism allows stakeholders to raise questions or concerns or provide positive feedback and have them addressed in a prompt and respectful manner. The Offset Partner and/or project developer aims to address all complaints received, regardless of whether they stem from real or perceived issues and whether the complainant is named or anonymous. Any stakeholder who considers himself or herself affected by activities of the Foundation's supported Offset Partners and their projects will have access to this Grievance Mechanism at no cost. The statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process.

This Grievance Mechanism establishes the process for addressing complaints raised in connection with activities of Foundation's supported Offset Partners and their projects. It describes the scope and procedural steps for the complaint handling process and specifies roles and responsibilities of the parties involved. It will be revised and updated periodically by the responsible person within the Foundation based on experience and feedback from stakeholders.

This Grievance Mechanism is designed for the handling of grievances by each individual Offset Partner. Each Offset Partner is responsible for handling grievances related to its activities and projects under the Foundation's support and will regularly report to the Foundation as part of the overall monitoring.

### Objectives

This Grievance Mechanism has the following objectives:

- Establish a prompt, consistent and respectful mechanism for receiving, investigating and responding to complaints from stakeholders
- Ensure proper documentation (logging) of complaints and any corrective actions taken

- Identify and manage stakeholder concerns and thus support effective risk management
- Contribute to continuous improvement in performance through the analysis of trends and lessons learned, and
- Enhance trust and positive relationships with stakeholders

The key principles of the Grievance Mechanism are outlined in **Figure 1**.

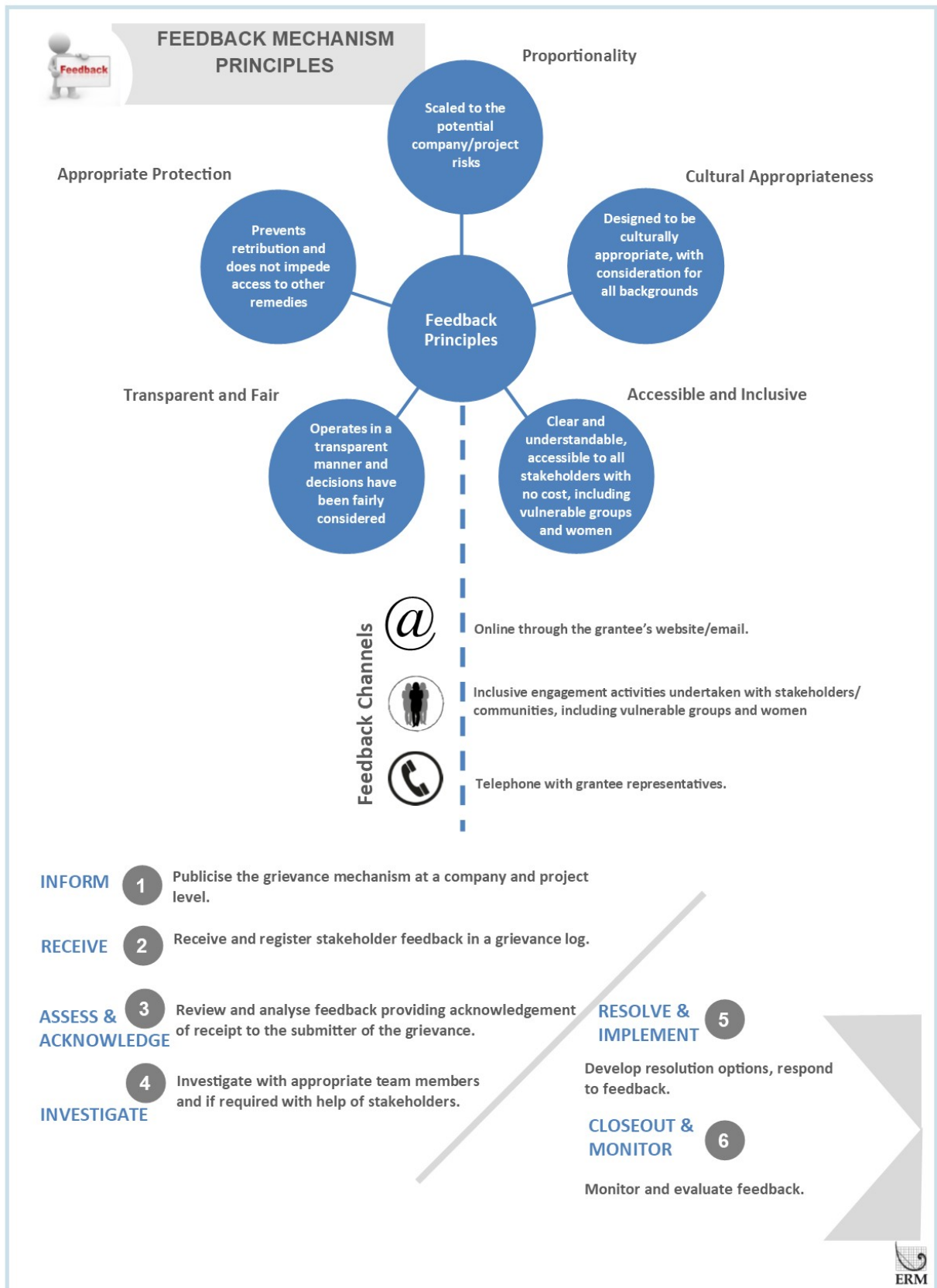


Figure 1: Principles of the Grievance Mechanism

## Scope

This Grievance Mechanism is open to all stakeholders who consider themselves affected by the activities of the Foundation/Offset Partners. Complaints may be submitted on a named or anonymous basis. Although anonymous submissions may be harder to resolve, they will be treated in the same way as named complaints to the extent reasonably possible.

There are no restrictions on the type of issue a stakeholder can raise under this Grievance Mechanism. However, when a complaint is received that is more appropriately handled under a separate company process established for that purpose (such as employment or business integrity related issues), it will be re-directed so as to prevent parallel processes being followed. All complaints received under this Grievance Mechanism shall be tracked until close out regardless of the process under which they are handled.

The Offset Partner reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified and therefore un-actionable dissatisfaction with the Offset Partner, is otherwise malicious or vexatious in nature, or concerns a matter for which the Offset Partner has no formal responsibility (for example, a matter that the government controls).

## Terminology

Terminology used in this Grievance Mechanism has the following meaning:

<b>Term</b>	<b>Definition</b>
<b>Complainant</b>	An individual, group or organisation who submits a complaint to the Foundation/Offset Partner
<b>Complaint</b>	An expression of dissatisfaction with the activities of an Offset Partner under a Foundation-supported project, typically referring to a specific source of concern and/or seeking a specific solution. For the purposes of this Grievance Mechanism, a question or request may also be treated as a complaint
<b>Complaint Log</b>	A database for maintaining information about complaints received
<b>Contractor</b>	An individual or firm that has entered into a contract to provide goods or services to the Offset Partner. The term covers parties directly contracted by the Offset Partner and those contracted by a contractor company, also referred to as subcontractors
<b>Offset Partner</b>	A company or an organisation that receives Advisory Services directly from the Foundation
<b>Registration Form</b>	A form used to capture information about an incoming complaint
<b>Portfolio</b>	All projects aggregated

<b>Projects</b>	Projects or project activities being advised by the Foundation (see also definition in the Foundation’s <a href="#">ESMS</a> )
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### Roles and Responsibilities of the Foundation and the Offset Partner

Roles and responsibilities under this Grievance Mechanism are as follows:

<b>Role</b>	<b>Responsibility</b>
<b>Foundation’s E&amp;S Expert</b>	<ul style="list-style-type: none"> <li>• Responsible person within the Foundation who is responsible for the implementation of this Grievance Mechanism. This includes serving as custodian of the complaints process, monitoring the handling of complaints, and suggesting changes to policies or practices based on lessons learned.</li> <li>• Review of Grievance Log and review of closure/resolution of grievances for the projects that fall within the respective region.</li> <li>• Members of the Foundation having direct liaison with the Offset Partners and thus assist and help resolving grievances on the ground.</li> </ul>
<b>Offset Partner’s Complaint Owner (CO)</b>	A role of the Offset Partner. Responsible for investigating and resolving a complaint. This includes conducting investigations, proposing resolutions, implementing corrective actions and co-ordinating with personnel on the ground and other parties.

### Grievance Mechanism for Resolving Complaints

This section sets out the process to be followed for receiving, investigating, and resolving complaints. All grievances will be treated by the Offset Partner who will also publicly communicate the Grievance Mechanism to affected stakeholders to make them aware of the process, their rights to submit grievances, and how the mechanism will function. The steps of the Grievance Mechanism are outlined in

Figure 2.



Figure 2: Grievance Mechanism Key Steps

### Step 1: Receive

The Offset Partner shall communicate the existence of this Grievance Mechanism to the stakeholders as part of their stakeholder engagement activities. Stakeholders shall be able to use the following methods to submit a grievance:

- Orally to the Offset Partner
- By filling the Public Grievance Form online, and
- In writing via grievance boxes located in the area of the project

The Grievance Mechanism is initiated when a complaint is received by a staff member or contractor and referred to the Complaint Owner (CO).

If the complaint is readily resolvable and can be dealt with immediately, the CO takes action to address the issue directly and records the details in the Grievance Log. Please find an exemplary Grievance Log at the end of this Annex D.

If the complaint is not readily resolvable, the CO will ask the Complainant to complete the Public Grievance Form. An example is attached. If the Complainant is unable to complete the form, the CO will fill it out and read the contents back to verify accuracy. This method of completion will be noted on the form. If the Complainant refuses to complete the Public Grievance Form, he or she will be offered the option to have the complaint treated on an anonymous basis. The CO creates a record of the complaint in the Grievance Log.

A Complaint Register should capture the following: name (optional), contact details (optional), communication channels, type of complaint, complaint, date of complaint, steps of complaint management, and responsibilities of the relevant persons within the Offset Partner's organisation and within the Grievance Mechanism.

## **Step 2: Assess & Assign**

The CO defines the timelines for an investigation and any follow-up actions. For complaints regarding issues for which a more appropriate company process already exists, the CO shall refer the matter to the appropriate process owner for further action. This will typically be the case for Complaints related to contractual or commercial issues; industrial relations and employee relations; business integrity or criminal matters; and issues subject to current or pending litigation. The CO updates the Complaint Record as appropriate.

## **Step 3: Acknowledge**

Once a complaint has been assessed, the CO sends a written acknowledgement to the Complainant. The letter should normally be sent within seven days of receiving the complaint. The CO documents the acknowledgement in the Grievance Log.

## **Step 4: Investigate**

The CO investigates the factual basis for the complaint and proposes options to resolve the issue.

The CO may involve the Foundation and other third parties in the fact-finding process as required. The identity of the Complainant should only be disclosed to the extent necessary to resolve the issue or as required by law. If the Complainant has specifically requested that his or her identity not be disclosed, their personal information may not be shared with third parties unless required by law.

The Offset Partner generally seeks to resolve complaints within 30 days. The maximum resolution period should not normally exceed 60 days. The CO is responsible for providing regular progress reports to the Complainant, including a verbal update every five working days and a written update after ten working days. If additional time is needed to complete an investigation, the CO will notify the Complainant of the reason for the delay.

When the investigation is complete, the CO documents the findings and proposes options for resolving the complaint as appropriate.



### Step 5: Respond

The CO defines a response to the Complainant. The response should communicate the findings of the investigation, set out the proposed solution and timelines, and seek feedback from the Complainant.

The CO determines next steps based on feedback from the Complainant. If the Complainant accepts the resolution, the Offset Partner will proceed to implement. If the Complainant does not accept the resolution, the Complaint can appeal the grievance. The Complainant's response will be documented in the Complaint Log.

### Step 6a: Resolution

If the Complainant accepts the proposed resolution, the agreed actions are implemented.

The CO is responsible for assigning action parties, actions and deadlines to implement the resolution. These will be recorded in the Grievance Log with any supporting documentation. Monitoring arrangements may need to be put in place to verify implementation.

The CO asks the Complainant to sign the Confirmation Form. If the Complainant agrees to sign, the Complaint is closed out as resolved. If the Complainant refuses to sign, or has failed to sign within the timeframe allowed, the Complaint will be appealed.

### Step 6b: Appeal

The Offset Partner will seek to reach a resolution with the Complainant that is satisfactory to both sides. If the Offset Partner and the Complainant are unable to agree on a solution, the Complaint may be escalated to the Foundation for review and final decision. The responsible E&S Expert will work with the CO and the Complainant on resolving the grievance.

In case the Complainant does not accept the resolution proposed by the Foundation, the grievance will be taken to a third party for further action. Third parties may include the relevant regulatory authority (such as the Environmental Agency responsible), a lawyer or local community organisation. The third party reviews the case and determines if further reasonable action is possible. If no reasonable action is possible, the third party authorises the close out of the Complaint. A close out letter will be sent to the Complainant explaining the position of the Foundation and the Offset Partner.

Cases where the Complainant disputes or declines to acknowledge the implementation of a previously agreed resolution may also be referred to third parties for review.

If actions taken on a grievance are not successful, a stakeholder may turn to court in accordance with the existing national legislation.

### Step 7: Follow-up & Close Out

A Complaint is closed out when no further action can be or needs to be taken.

Closure status will be classified in the Grievance Log as follows:

- **Resolved.** Complaints where a resolution has been agreed and implemented and the Complainant has signed the Confirmation Form.

- **Unresolved.** Complaints where it has not been possible to reach an agreed resolution.
- **Abandoned.** Complaints where the Complainant is not contactable after one month following receipt of a Complaint and efforts to trace his or her whereabouts have been unsuccessful.

The CO is responsible for updating the Grievance Log and the logistics associated with closing out the case.

At the end of a case, regardless of whether agreement was achieved, the CO will seek feedback from the Complainant on their level of satisfaction with the complaint handling process and its outcome.

## Performance Monitoring and Reporting

The CO is responsible for gathering and reporting performance monitoring data under this Grievance Mechanism. All performance monitoring data should be reported to the Foundation's E&S Expert at least twice a year. Key Performance Indicators (KPIs) will be collected to enable the Foundation to analyse trends in complaints received and identify underlying systemic issues. The Foundation's E&S Expert is responsible for making recommendations for changes to policies or practices of the Offset Partner based upon on-going learning from Complaints.

## Confidentiality

### Duty of Confidentiality

The Foundation and the Offset Partner are committed to protecting the identity of the Complainant and to handling personal information in accordance with legal requirements. This duty extends to all employees or representatives of the Offset Partner or its contractors who participate in the Complaint-handling process.

Information about a Complaint will be shared within the Offset Partner's organisation on a need-to-know basis and only to the extent necessary to complete a step under this Grievance Mechanism. The Foundation and the Offset Partner will not share personal information with third parties unless required by law or authorised by the Complainant.

### Personal Data

Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period as required by relevant laws and regulations on Data Privacy.

### Conflicts of Interest

A conflict of interest exists when there is a divergence between the interests of an employee or contractor and his or her responsibilities under this Grievance Mechanism, such that an independent observer might reasonably question whether the actions of that person are influenced by his or her own interests.

This Grievance Mechanism seeks to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the Complaint-handling process and avoiding placing individuals in a position where conflicts could be perceived to arise. When a Complaint relates to a specific Foundation or Offset Partner employee, that person shall not play a role in the Complaint-handling process.

### Protection from Retribution

Retribution is any adverse action taken against a Complainant, employee or contractor whose purpose is to frustrate the operation of this Mechanism. The Foundation and the Offset Partner will not tolerate such conduct. When concerns about retribution or victimisation are raised, they will be investigated by the Foundation.

Foundation/Offset Partner Grievance Form	
Reference No (assigned by the receiving agency):	
Date:	
<i>Please enter your contact information and grievance. This information will be dealt with in confidence.</i>	

<i>Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered by the agency.</i>	
Full Name	
Anonymous submission	<input type="checkbox"/> I want to remain anonymous
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Mail (Please provide mailing address): _____
	<input type="checkbox"/> By Telephone (Please provide Telephone number): _____
	By E-mail (please provide E-Mail address): _____
Preferred Language for communication	<input type="checkbox"/> English <input type="checkbox"/> German <input type="checkbox"/> French <input type="checkbox"/> Other, please specify: _____
<b>Description of incident or grievance:</b> What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of incident/grievance: _____	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? ____) <input type="checkbox"/> On-going (currently experiencing problem)
<b>What would you like to see happen to resolve the problem?</b>	

Foundation/Offset Partner Grievance Resolution Form			
Reference No.:			
Name of Complainant		Name of Respondent	
Date of Complaint Submission			
Address			
Tel.			
<b>Description of incident or grievance:</b>			

<b>Complaint Response or Corrective Action(s):</b>	
<b>Internal Foundation / Offset Partner Communication (if any):</b>	
<b>Response Satisfactory?</b>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	<b>Signature of Complainant</b>

### Foundation/Offset Partner Grievance Log<sup>1</sup>

Foundation/Offset Partner Grievance Mechanism Register									
Number	Date of the Receipt	Type of Receipt	Name of the Complainant	Description of the Grievance	Grievance Issued to Relevant Department	Due Date for the Response	Actual Response Date	Details of Corrective and Preventive Action	Response Date to the Complainant

<sup>1</sup> This Grievance Log template is also transcribed to an Excel spreadsheet. All the applicable information will be captured consistently and continuously for each complaint by the Foundation.

