

GLF ESMS Annex G-2

<*Project title*>

**grievance mechanism Template**

<grantee>

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### NOTE: this is a template for Grantees to use.

This is the template for a project ESMP. Guidance to the Grantee is provided in blue text. The black text is suggested text to be used by Grantees which can be edited as necessary.

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# Introduction

*Galápagos Life Fund (GLF) has established a Grievance Mechanism to ensure fair, efficient, and transparent management of grievances and complaints from Project Affected Peoples (PAPs), community members, workers, and other GLF stakeholders. The Grievance Mechanism supports GLF’s efforts to build strong relationships with internal and external stakeholders and manage its funding activities’ impact on potentially affected communities. The GM will also consider positive feedback and suggestions. The GM is designed to align with the International Finance Corporation Performance Standard (IFC PS) 1's requirements regarding managing grievances and external communications from affected communities and other stakeholders[[1]](#footnote-2). The GLF Grievance Mechanism is free and accessible through various channels, including an email address, a dedicated WhatsApp number, a virtual mailbox on the GLF website, and a physical mailbox at GLF headquarters in Puerto Ayora, Galapagos.*

*All GLF-funded projects must develop and implement Grievance Mechanisms to**ensure PAPs, community members, protect workers, and other stakeholders potentially affected by a project are able to bring their grievances to the Grantees about any issues related to the GLF-funded projects for consideration and redress. GLF is therefore an integrated part of this Safeguard Instrument.*

*A project level grievance is considered to be any complaint, comment, question, concern, suggestion about the way a project is being implemented. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments and concerns about Project activities during construction/inception or operation/implementation, or perceived incidents or impacts have been addressed.*

*Project workers (Grantee employees) must have access to a worker grievance mechanism with the option to use an anonymous channel (where the Grantee cannot provide this, GLF’s Ethics Hotline shall be made available to Project workers).*

*This document is focused on providing guidance to Grantees to support the development and implementation of their Grievance Mechanisms.*

## Objectives and Scope

*Projects funded by GLF and executed by Grantees must have their own Grievance Mechanism connected to the GLF’s mechanism. Grievances that cannot be solved directly by the Grantees shall be escalated to GLF.*

*Suggested text:* The Grievance Mechanism seeks to:

* Address stakeholders’ grievances and concerns efficiently and transparently, ensuring timely responses to every grievance.
* Be free and accessible to project-affected people.
* Support optimal environmental and social performance in GLF and GLF-funded projects.
* Build and maintain trust with all stakeholders.

*The Grievance Mechanism is not intended to replace country level dispute resolutions and redress mechanisms. This means that local communities can always use formal country level mechanisms, including arbitration, administrative or legal avenues to raise concerns.*

## Operative Principles

*The GLF-funded project Grievance Mechanisms are guided by the following principles:*

* ***Proportionality****: is proportional to GLF-funded projects and should be proportional to the risks and potential impacts of the project in question.*
* ***Accessibility:*** *is widely accessible to stakeholders. It is free of charge for individuals and communities.*
* ***Objectivity and fairness:*** *objectively manages complaints with fairness to all people.*
* ***Transparency and accountability:*** *manages grievances transparently. All complaints are processed, and all complainants receive a response within an established timeframe.*
* ***Cultural appropriateness:*** *is appropriate to the culture and context of Ecuadorian communities, especially the Galapagos communities.*
* ***Problem-solving and learning-oriented:*** *favours dialogue and consensus to solve the issues that cause the complaints and the learning derived from both the complaint and its solution.*

# Grievance Mechanism

## Access

*Information about the project's specific Grievance Mechanism, the procedures, who to contact and how, will be made available physically at strategic project sites and on the project's grantee webpage. General information about all GLF funded projects and the Grievance Mechanism will be published on GLF´s website. Additional materials might be made available by grantees during stakeholder engagement and consultation activities.*

## Structure

*The figure below illustrates the relationship between the Grievance Mechanisms of GLF-funded projects and the role played by GLF in grievance resolution.*

*The GLF-funded projects represent the first level of the structure. Each Grantee should have its own grantee-specific Grievance Mechanism. Grievances from communities and other stakeholders related to a project funded by GLF are typically received at a project level.*

*GLF has an established Grievance Management Committee which comprises the Sustainability Officer, Communications Officer, Program Officer(s), and the GLF Director or their delegate (who needs to be a GLF staff member). Grievances from communities and other stakeholders can be received directly by GLF. GLF's Grievance Management Committee* *will also address grievances escalated by Grantees.*

*The GLF Board of Directors represents the final level of the Grievance Mechanism structure. Grievances are not directly received at this level; only those escalated by the GLF Grievance Management Committee are reviewed by the GLF Board of Directors.*

Figure 1: GLF Grievance Mechanism Structure



## Ethics Hotline

**GLF's Code of Ethics guides employees, grantees, consultants, independent experts, workers, interns, and volunteers in upholding core values in their work.** The GLF Ethics Hotline provides a confidential and anonymous channel for employees, grantees, and other partners to report sensitive incidents of illegal or unethical conduct.

GLF's Ethics Hotline will be made available to workers from GLF funded Projects to capture and manage project-related complaints or grievance from workers providing a confidential and anonymous mechanism. Where Grantees’ worker grievance mechanisms do not include an anonymous channel, GLF’s Ethics Hotline shall be made available to Project workers.

**https://glf.lineaconfidencial.com/**

# Grievance Process for GLF-Funded Projects

*Suggested text:* All grievances are processed and addressed. The standard grievance process involves the following aspects:

* Reception
* Registration
* Screening of eligibility
* Investigation
* Response
* Closure

## Submitting a Grievance

*Suggested text:* Stakeholders shall submit a grievance in writing:

* by filling out the Grievance Form online (on grantee's project page or GLF website).
* by leaving a message in the physical mailbox located at: GLF Offices, Santa Cruz, Galápagos.
* by sending an email to: *<* *fill* *in e-mail* >
* by sending a WhatsApp message to < *fill in WhatsApp number >*

*A template or form for submitting grievances is available in Annex 1-B. This can be adapted by <Grantee>. Grievances must be presented with enough information to permit their assessment and processing.*

## Registering a Grievance

*Suggested text:* All grievances received are recorded on a Grievance Register or log maintained by the Grantee. Note all the resulting processes, actions, decisions and responses are recorded in the same register.

*A template for a Grievance Register is included in Annex 1-A.*

## Acknowledgment of a Grievance

*Suggested text:* <Grantee> will formally acknowledge a grievance in writing, within 10 working days of submission. If the grievance is not well understood or if additional information is required, clarification should be sought from the complainant during this step.

The copy of the grievance response will be logged in the Grievance Register template by the <Grantee>.

## Assessment of Eligibility

Received grievances and complaints must be screened to determine their eligibility. They must be attended as long as:

* they are generated within the project ́s area of influence;
* they are generated throughout the fixed time for the management and implementation of the project; and
* they are signed and provide contact information to which a reply can be notified (anonymous complaints cannot be addressed).

## Response

*All eligible grievances will be responded to with information or actions implemented to address the issue. <Grantee> can respond to simple, localized grievances following the quick responses to simple grievances. Other, more complex grievances that are deemed eligible must be responded to and may require further discussion within the <Grantee> Organisation or a thorough investigation. All grievance responses will be registered in the Grievance Register.*

### Simple Grievances: Quick Responses

*GLF supports and promotes Grantees’ quick responses to simple grievances or complaints. Some eligible grievances or complaints are straightforward, localized, and linked to a single cause or a simple cause chain. If the Project Manager can solve a complaint, he/she will do so. In the cases when <Grantee> can respond quickly to the complainants, the grievance and its response will be recorded in the Grievance Register by the Grantee and can be reviewed by the GLF, if needed.*

### Complex Grievances: Discussion and InvestIgation

*Suggested text:* If the grievance cannot be attended to by the Project Manager, the complaint will be passed on to discussion by the Grievance Management Committee, which will attend to it, depending on the complexity of the complaint. If necessary, a special session will be arranged in order to submit a response or position. The response to the complaint must not exceed 60 working days and must be in writing.

The Grievance Management Committee may decide to procure the services of a third party if the case is complex. GLF should be notified immediately of a complex grievance.

*Suggested text:* Eligible grievances or complaints that are not simple and cannot receive a quick response will be thoroughly investigated by the *<Grantee>*. The investigation is intended to establish, among others, the following aspects:

* The veracity of the facts (whether the complaint is strong and relates to events that probably did occur)
* The root cause of the problems or issues referred to by the complaint
* The responsibilities of the involved parties
* The grounds for further action, including legal action
* The need to inform other relevant parties about the grievance (funding partners, Ecuadorian public offices, and others)
* In cases involving Sexual and Gender-based Violence (SGBV), GLF's response with a human rights perspective, in a victim-centred manner, respecting the principles of do no harm, confidentiality, safety, non-discrimination, participation in decision-making processes and informed consent to the disclosure and use of the information
* The appropriate response to the grievance.

## Closure

*Suggested text:* Required actions are implemented to address the issue, and completion of these is recorded in the Grievance Register.

Actions taken by the project to address the issue should be reported to the complainant. The responsible staff should use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. The response of the complainant is recorded to help assess whether the grievance is closed or whether further action is needed. Ideally, both parties should sign off the grievance to confirm closure. Or, alternatively, the Grievance Management Committee will determine that the issue has been addressed to the full extent possible.

If the complaint is not closed, additional required actions are implemented and further engagement with the complainant is undertaken to address the issue until the complaint is closed.

## Grievance Mechanism Reporting

*Grantees must maintain the Grievance Register live and up to date and make this available to GLF on request. This will include an update on the status of grievances.*

*Grantees must report to GLF on grievance management quarterly.*

# Grievance Escalation

*Suggested text:* Grievances can be escalated from *<Grantee>* to GLF and from GLF to the GLF Board of Directors in the following cases:

* Grievances that cannot be responded to by the *<Grantee>*will be escalated to GLF. This may include grievances received by the *<Grantee>* that contain serious allegations against them, and answering these complaints would create a real or perceived conflict of interest.
* Grievances that cannot be responded to by the GLF Grievance Management Committee will be escalated to the GLF Board of Directors. This may include grievances received by GLF that contain serious allegations against GLF Director, and answering these complaints would create a real or perceived conflict of interest.

Furthermore, if actions taken on a grievance are not resolved to the satisfaction of the complainant, a stakeholder may turn to GLF directly to log a grievance.

In the event of serious complaints or those that cannot be resolved promptly, *<Grantee>* will inform the GLF of the details. Complainants may decide to present their complaint to GLF directly.

# GLF Ethics Hotline

Alternative to GLF's ESMS, GLF has established an anonymous online and phone mechanism accessible to employees, consultants, independent experts, organizational and external workers, interns, volunteers, partners, communities, and other stakeholders. This platform allows for reporting violations of GLF's Code of Conduct and related Policies (e.g., Human Rights, SEAH, GBVH), as well as sensitive grievances including rights-related issues outlined in GLF's Policy Framework and GLF's ESMS.

Reports can be submitted anonymously or confidentially, in Spanish or English, either online or by phone. Third-party reporting is also accepted.

Any violations of GLF's code of ethics or any sensitive or illegal or unethical conduct should be reported to GLF through it's Ethics Hotline at **https://glf.lineaconfidencial.com/**

Concerns and grievances can be reported online in written or verbally by phone.

This mechanism allows for anonymous reporting of all serious misconduct or unethical behavior, including sexual harassment and fraud.

Grievances submitted through GLF's Ethics Hotline are handled securely and confidentially by an independent third-party service provider. All reports are investigated immediately before being submitted anonymously or the GLF Board of Directors for resolution or, if deemed necessary and expressed desire, to the Authorities.

**GLF Prioritizes Victim Needs:** GLF is committed to a "do no harm" approach, prioritizing the rights, needs, and well-being of victims. We will strive to protect the privacy of all complainants, reporters, and subjects of complaints, offering options for confidential or anonymous reporting at both project and organizational levels. All concerns, reports, and investigations will be handled with discretion, and records will be kept securely. Communications regarding these matters will remain confidential.

The GLF Ethics Hotline will be widely promoted through appropriate media and will be published on all GM related media as an alternative mechanism to report sensitive incidents of unethical or illegal conduct.

**https://glf.lineaconfidencial.com/**

# Annexes

# Annex 1-A- Grievance Register

See Excel-based tool.

# Annex 1-B- Template for Grievance Mechanism Form

| FORMAT TO SUBMIT A GRIEVANCE TO THE GRIEVANCE MECHANISM |
| --- |
| Please enter your contact information and grievance. This information will be dealt with confidentially.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. |
| 1 | FULL NAME |  |
| 2 | ANONYMOUS COMPLAINT | [ ]  | I prefer that my complaint remains anonymous |
| 3 | CONTACT INFORMATION \* \* Choose at least one | [ ]  | Email: |
| [ ]  | Telephone: |
| [ ]  | Postal address: |
| 4 | DATE OF SUBMISSION OF THIS INFORMATION | YYYY-MM-DD |
| 5 | PREFERRED LANGUAGE FOR COMMUNICATION | [ ] Spanish[ ] English[ ] Other, please specify: ­­­­­­­­­­­­­­­­ |
| ABOUT THE GRIEVANCE |
| 6 | LOCATION WHERE INCIDENT OR GRIEVANCE TOOK PLACE | Be as specific as possible |
| 7 | DATE OF OCCURRENCE | The date on which the events took place. If you do not know the exact date, give an approximate date.  |
| Year: | 202? | Month |  | Day |  |
| [ ]  | Only once  | [ ]  | More than once  | [ ]  | It is still happening |
| 8 | DESCRIPTION OF EVENTS | Describe what happened? Where did it happen? Who did it happen to? What is the result of the problem? |
| 9 | WHAT WOULD YOU LIKE TO SEE HAPPEN? | Explain how you would like to see this resolved? |

1. IFC, PS 1, § 3, Objectives, and Guidance Note 1GN3 (2012, reviewed on June 14, 2021, available [here](https://www.ifc.org/content/dam/ifc/doc/2021/20210614-ifc-ps-guidance-note-1-en.pdf)) [↑](#footnote-ref-2)