

Table of Contents

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Page 3 Stakeholder Identification and Consultation

Page 4 Staffing

Page 5 Process Steps

Page 7 Receive

Page 9 Acknowledge

Page 10 Evaluate

Page 12 Offer Resolution

Page 14 Implement Resolution

Page 15 Close and Monitor

Page 16 Follow-up

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| Stakeholder Identification and Consultation | | |
| **Questions** | **Options** | **Tools** |
| Are communities **near** the project **clearly defined** in the grievance mechanism documentation?  **Near:** On the project fence line; along transport routes; arguably affected;  **Clearly defined:** Listed in grievance mechanism documentation; included in awareness campaigns and advertising for the grievance mechanism. | Ask staff why some communities are excluded—was it an oversight or are there compelling reasons? Stress the importance of including all arguably affected communities. | **In this toolkit:**  Section 4: Building a Good Grievance Mechanism  Tool: Publicizing a Grievance Mechanism and Providing Access  Tool: Sample Complaint Acknowledgement Letter  **Other Resources:**  Stakeholder mapping; impact assessment;  Community meetings; community surveys; one-on-one meetings  Cultural survey; hiring local people to give insights to cultural aspects that need to be considered; impact assessment  IFC. "Good Practice Note: Addressing Grievances from Project-Affected Communities," p. 10 ("Cultural Attributes and Grievance Mechanisms")  CAO. "A Guide to Designing and Implementing Grievance Mechanisms for Development Projects," p. 23-4 ("Information Needed to Develop a Grievance Mechanism for Greenfield/Existing Projects")  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): How to Implement Community Grievance Mechanisms Guide, p. 7 ("Engage External Stakeholders") |
| Were community members **consulted** during the design of the grievance mechanism?  **Consultation:** A two-way exchange of information that includes providing information to community members as well as gaining community views through questions and interactions. | Suggest that community views be solicited on how the mechanism functions. Use this information to design, implement, modify, and improve the mechanism. |
| Have **culturally appropriate** methods for complaint handling been considered during the design?  **Culturally appropriate:** Ensure culture is not a barrier to access and that content is in accordance with local language, culture, and norms. For example, it may be helpful to have indigenous consultation specialists in places where this is an issue. Likewise, it may be necessary to have female liaison officers if women typically do not engage directly with men. | Consider additional staffing needs; identify people within the company that meet necessary characteristics that could perform additional job responsibilities with proper training; interview community members to better understand how they resolve disputes and to understand cultural sensitivities and concerns that need to be incorporated in the design, implementation and modification of the grievance mechanism. |

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| Staffing | | |
| **Questions** | **Options** | **Tools** |
| Is staffing **sufficient** for the volume and complexity of complaints received?  **Sufficient:** Not all projects have dedicated staff to handle complaints. Often this task is conducted by the community relations (CR) or community liaison officer (CLO) staff. Most CR/CLO staff can manage a few complaints a month, but if the volume becomes greater than this, it may be necessary to have a dedicated staff member(s) to handle complaints. | Hire additional staff; train staff in other disciplines to accept and potentially manage community complaints; train contractors to handle complaints. | **In this toolkit:**  Section 5: Making a Grievance Mechanism Work  Tool: Terms of Reference for Grievance Officer and Community Liaison Officer  Tool: Grievance Mechanism's Roles and Responsibilities for Company Staff and Contractors  **Other Resources:**  IPIECA, Community Grievance Mechanisms in the Oil and Gas Industry, Tool 5: Job Description - Grievance Officer  IFC Performance Standards Guidance Note 1 |
| Are roles and responsibilities **clearly defined** and understood by staff and contractors?  **Clearly defined:** See Roles and Responsibilities tool. It is important for site management to know their accountability for the grievance mechanism and to identify the staff member responsible for its day-to-day functioning. It is also necessary for community-facing staff to understand responsibilities and boundaries. | Define roles and responsibilities in project documents; hold informational sessions to clarify roles and responsibilities. |
| Is **proper training** in place?  **Proper training:** Do responsible and accountable staff receive in-depth training so they can manage the day-to-day aspects of the grievance mechanism? Are all staff members and contractors given awareness-level training, and are their responsibilities clearly defined? | Conduct training sessions for all staff that may interact with community complaints; conduct training for contractors. |

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| Process Steps | | |
| **Questions** | **Options** | **Tools** |
| Are the process steps and timelines clear and **appropriate**?  **Appropriate:** Do the steps present an easy to follow and predictable sequence? Are the timelines short enough to make complainants feel like the process is progressing, but long enough to allow deadlines to be met without undue burden or shortcutting? | Redefine the process to include steps that may be missing; establish shorter timelines if complainants feel the process is not moving adequately, or lengthen timelines if the process timelines cannot be met or if there is feedback that complaints are not being adequately and collaboratively resolved. | **In this Toolkit:**  Section 5: Making a Grievance Mechanism Work  Tool: Sample Complaint Acknowledgement Letter  Tool: Sample Community Grievance Mechanism Procedure  **Other Resources:**  Develop a spreadsheet system (e.g. IPIECA tracking tool); pursue a third-party software system.  "Grievance Management" in: IFC. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007), pp. 69-79  ICMM. "Human Rights in the Mining & Metals Industry: Handling and Resolving Local Level Concerns & Grievances" (2009), pp. 10-20  IFC. "Good Practice Note: Addressing Grievances from Project-Affected Communities," pp. 3, 18  CAO. "A Guide to Designing and Implementing Grievance Mechanisms for Development Projects," p. 4 ("The Typical Steps of a Grievance Mechanism"), p. 34 ("A Grievance Mechanism with Multiple Local Approaches to Resolving Complaints"), pp. 23-4 ("Information Needed to Develop a Grievance Mechanism for Greenfield/Existing Projects")  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): How to Implement Community Grievance Mechanisms Guide, p. 4 ("How does the procedure work?")  IFC. "A Strategic Approach to Early Stakeholder Engagement," pp.106-7 ("Steps for grievance management") |
| Is there a system for **logging and tracking** process steps?  **Logging and tracking:** A system for documenting the steps in the grievance resolution process; facilitates systematic handling of complaints and development of key performance indicators. | Create a logging system. This can be as simple as a spreadsheet or as complex as customized software. |

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| Receive | | |
| **Questions** | **Options** | **Tools** |
| Is the process open to a wide range of complaint types, and are community members aware of this? | It is common practice for grievance mechanisms to be the first point of contact for any type of complaint or question regarding company operations. Not applying limits on the types of concerns that can be addressed can encourage people to use the mechanism. However, types of complaints may need to be referred to other departments (for example, a complaint regarding award of a contract may be referred to the contracting and procurement department). | **In this toolkit:**  Section 5: Making a Grievance Mechanism Work  Tool: Sample Complaint Acknowledgement Letter  Tool: Sample Community Grievance Mechanism Procedure  Tool: Publicizing a Grievance Mechanism and Providing Access  **Other Resources:**  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): Grievance Register  IPIECA, Community Grievance Mechanisms in the Oil and Gas Industry, Module 3 |
| Are most issues **within reason** eligible for inclusion in the grievance mechanism?  **Within reason:** Arguably related to the project. | Many grievance mechanisms err toward inclusion rather than exclusion. From experience, most issues presented to a grievance mechanism are related to project impacts and are seldom unrelated or spurious. |
| Is there a range of **contact options**, and are they appropriate given the context?  **Contact options:** Avenues for presentation of a complaint. May include a toll-free telephone line, email, a suggestion box in a public place, an in-person inquiry to a staff member or contractor, a question or concern presented at a public meeting, or a trusted local official or community member. | Include as many contact options as feasible. Make sure each contact knows the central contact point for presentation of complaints. |

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| Is the grievance mechanism **well and appropriately publicized**?  **Well and appropriately publicized:** Information is accessible to anyone who would need it. This may include radio spots, billboard advertisements, newspaper advertisements, discussion at public meetings, etc. | Increase advertising if necessary. Conduct informal polls of community members to determine where they would go if they had a complaint. Use this to guide where to advertise. |  |
| Are there any barriers to access (e.g., language, presence of indigenous or vulnerable people, etc.), and have they been addressed? | Translate materials into local or minority languages. Make sure contact points cover the full range of community members (e.g., indigenous people, minorities, women, etc.). Work with local NGOs to make sure they know how the grievance mechanism works and encourage them to inform those they are working with. |
| Can complaints be submitted anonymously? Does the grievance mechanism preserve confidentiality where appropriate? | Preserving confidentiality should be the baseline condition for the mechanism. Determine who has access to private data and if this access is appropriate. Make sure the mechanism has the capacity to handle anonymous complaints. |
| Is there a clear understanding of all the different places a complaint can be received (e.g., field or office staff, contractors, workers from the local community, etc.) and a process to assure these complaints will be entered in the grievance mechanism? | Check to see that points of entry are documented. Conduct informal survey of staff and contractors to determine if they know what to do if they receive a complaint. Review the grievance mechanism documentation to determine the range of types of points of entry. |

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| Acknowledge | | |
| **Questions** | **Options** | **Tools** |
| Do complainants receive acknowledgement of receipt of the complaint within a **reasonable timeframe**?  **Reasonable timeframe:** Usually this would be within 3-5 days of receipt. | Create a customizable form for the grievance officer to send to the complainant. Keep it simple - Acknowledgement should specify that the complaint was received and what the complainant can expect from the process and timelines. | **In this toolkit:**  Section 5: Making a Grievance Mechanism Work  Tool: Sample Complaint Acknowledgement Letter |
| Are complainants given materials to help them understand the grievance mechanism process steps and timeline? | Create a standard template to be included with the acknowledgement form. |
| Are complainants given a progress update throughout the process? | Establish requirements for communication at each step of the process. Create template text for letters that can be customized for each complaint. |

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| Evaluate | | |
| **Questions** | **Options** | **Tools** |
| Are the complaints categorized? | Categorizing complaints helps route the issue to the appropriate complaint owner. It also aids learning from complaints to improve operations. Complaint categories could include environment, social investment, local content, contracting, human rights, land access, property damage, etc. | **In this toolkit:**  Section 5: Making a Grievance Mechanism Work  Section 6: Closing the loop: Using Grievance Mechanism Feedback to Improve Business Practices  Tool: Sample Community Grievance Mechanism Procedure  **Other Resources:**  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): Grievance Register |
| Is the **complaint owner** clearly identified?  **Complaint owner:** The staff member or contractor responsible for evaluating the complaint and interacting with the complainant after receipt. | Specifying and empowering a complaint owner is critical for success. The complaint owner brings substantive expertise to the issue and serves as a knowledgeable point of contact for the complainant. This person must be someone who can analyze the complaint, solicit the input of any additional staff members or outside parties or experts as necessary, and make decisions as to how to investigate and resolve the issue. |
| Are the criteria for **escalating** to an owner other than the Grievance Officer clear?  **Escalating:** Complaints that cannot be addressed by the recipient or Grievance Officer need to be assigned an owner from an area of the business with substantive expertise related to the complaint. | A list of types of issues that can be managed directly by the Grievance Officer can be prepared. For example, some grievance mechanisms specify that the Grievance Officer is empowered to resolve questions and concerns that do not require an investigation by someone with substantive expertise. If a complaint is related to an incident (e.g., an environmental release, movement of materials on public roads, etc.), it will likely need a complaint owner that is familiar with operations at the time the incident occurred. |
| What fraction of complaints are handled by the Grievance Officer vs. escalated to another owner? | The complaint log should clearly specify complaints handled by the Grievance Officer vs. escalated. |
| Are there **objective and clear** criteria for evaluating complaints?  **Objective and clear:** Is the process specified; is the process free from bias; are people with substantive knowledge consulted; are multiple viewpoints considered; is there a possibility of appeal? | Checks and balances should be built into the grievance mechanism such that an individual in the company (such as the Grievance Officer) does not serve as the "judge and jury”. Check the grievance log to determine who was consulted and when during the evaluation. For all cases, at a minimum, the complainant should be consulted. |
| Are the findings of the complaint evaluation shared with the complainant? Has the complainant been consulted? | Check for documentation that the findings were presented to the complainant. Generally, this is best done in person. It can also be helpful to have more than one company representative discuss findings with the complainant, get their feedback, and respond to questions and their inputs on the findings. |

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| Offer Resolution | | |
| **Questions** | **Options** | **Tools** |
| Is the resolution offered **appropriate** for the nature of the complaint?  **Appropriate:** Does the offer match the scale of the concern? Does it make the complainant "whole," or the same as when the complaint was presented? If money is offered, is this appropriate and will it fix the problem? Can it be completed in a reasonable timeframe and at reasonable cost? | Those handling complaints can sometimes have a tendency to offer two extremes for resolution: one is to reject most claims from complainants and the other is to offer payment in the interest of maintaining peace that may be beyond what is required to fix the problem. Both of these "end member" scenarios need to be checked with an eye toward developing creative solutions between the extremes. | **In this Toolkit:**  Section 5: Making a Grievance Mechanism Work - The Appeals Committee  Tool: Sample Community Grievance Mechanism Procedure  **Other Resources:**  IFC. "Good Practice Note: Addressing Grievances from Project-Affected Communities," p. 24 ("Developing Resolution Options, Preparing a Response, and Closing Out")  IPIECA, Community Grievance Mechanisms in the Oil and Gas Industry, Module 3 |
| Is the proposed resolution **well-documented** and supported?  **Well-documented:** Are the views of experts and complainant documented? Is the fair value of any damage documented and verified? Is there an indication that independent verification was sought? | Make sure the grievance log is maintained. Check for supporting documentation for any offer of resolution (e.g., laboratory results or valuation of damaged resources). |
| Are offers of resolution presented in person? | Check for meeting notes that indicate staff meet with the complainant to discuss possible solutions to the complaint and incorporate the complainant's input on those solutions. Include a method of recording face-to-face meetings in the grievance log. |
| Is there a **clear** appeals process if the complainant does not accept resolution?  **Clear:** The complainant is given a written account of how to file an appeal and what he/she can expect once an appeal is filed. | Specify an appeals process that offers an independent view of the complaint with specified timeframes. |
| Are the members of the appeals body appropriate and **without a conflict of interest**?  **Without a conflict of interest:** Members do not have a vested interest or stand to benefit from an outcome. For example, decision makers should not have been involved with the original evaluation or have something to gain. | Suggest members of the appeals body that do not have interests in the complaint. Seek a third party if internal candidates do not appear to offer an objective opinion. |
| How often does the appeals body support the original offer of resolution vs. offering an alternate resolution? Does the result seem **reasonable**?  **Reasonable**: Are there indications the appeals body offers an independent view and is not just a rubber stamp for those that conducted the original evaluation and offer of resolution? | Looks for indicators of independence, such as descriptions of any flaws in the process or evaluation if the original offer is not supported, or additional backup information if the offer is supported. |

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| Implement Resolution | | |
| **Questions** | **Options** | **Tools** |
| Is the proposed resolution implemented as agreed and in a **timely** fashion?  **Timely:** The resolution is implemented as soon as the offer is accepted and resources are available. | Discuss the timeline with the complainant(s) for their input and when implementation is completed, ask whether or not they are satisfied with the resolution. Determine if timelines were followed. | **In this toolkit:**  Tool: Sample Community Grievance Mechanism Procedure  **Other Resources:**  IPIECA, Community Grievance Mechanisms in the Oil and Gas Industry, Module 3  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): Grievance Register |
| Is implementation **well-documented**?  **Well-documented:** Are contracts for work available? Is there documentation that the work was completed? | Include key steps in the grievance log to ensure documentation takes place. |
| Is there documentation as to whether the complainant is satisfied with the resolution? | A form letter may be prepared that allows the complainant(s) to sign off on implementation of resolution. In some instances, complainants may not want to sign an acceptance, for fear it will limit future options. In this case, it would be helpful to it would be helpful to document actions completed in a letter to the complainant, noting the summary letter does not imply specific endorsement from the complainant. |

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| Close and Monitor | | |
| **Questions** | **Options** | **Tools** |
| Has the complaint been closed in the grievance log (tracking system)? | Make a tick box for complaint closure. File any documentation. | **In this toolkit:**  Section 6: Closing the loop: Using Grievance Mechanism Feedback to Improve Business Practices  **Other Resources:**  IFC. "Good Practice Note: Addressing Grievances from Project-Affected Communities," p. 28 ("Examples of Monitoring Measures Commensurate with Project Impacts")  IPIECA, Community Grievance Mechanisms in the Oil and Gas Industry, Module 3  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): How to Implement Community Grievance Mechanisms Guide, p. 13 ("Track and Monitor") |
| Has a notice of **closure** been sent to the complainant?  **Closure:** A complaint is closed when the resolution has been implemented or when further activity would not be productive (i.e., the complainant does not accept the evaluation and offer of resolution). | Create a template form with generic details to communicate to the complainant on closure. |
| Has the complainant filed additional concerns related to the same complaint? | It can be helpful to track follow-up complaints, as repeated and related complaints can indicate dissatisfaction and ongoing concerns for communities. |

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| Follow-up | | |
| **Questions** | **Options** | **Tools** |
| Is there some **systematic** evaluation of the types of complaints received, response times, offers of resolution, and acceptance and complaints resolved vs. appealed?  **Systematic:** A periodic and consistent evaluation of the complaint process. | Institute quarterly reporting of grievance mechanism data to push a frequent evaluation of relevant parameters. | IIED. "Dispute or Dialogue - Community perspectives on company-led grievance mechanisms," p. 37 ("Three levels of depth in evaluating the effectiveness of grievance mechanisms"), pp. 39-40 ("Effectiveness Criteria for Operational-Level Grievance Mechanisms", "Selected examples of key performance indicators on grievance mechanisms")  IPIECA. The IPIECA Community Grievance Mechanism (CGM) Toolbox (2014): How to Implement Community Grievance Mechanisms Guide, p. 14 ("Learn and Improve") |
| Are there indications complaints data are used to offer systemic learning and improvement of processes that lead to complaints? | Check to see that complaints data are available to operations departments. If a certain department receives repeat complaints, do they work to improve processes so as to eliminate the issue causing concern? |
| Is the use and progress of **alternate forms of recourse** being tracked for complaints where the resolution offered was not accepted by the complainant?  **Alternate forms of recourse:** These may include power-based options, such as blockades, or legal options. | Check to see that staff are tracking any complaints where resolution was offered but not accepted. |