



GRIEVANCE REDRESS MECHANISM

An Outline for Addressing Grievances at all Levels

Catalogue Number

GRM - 001

Issued

September 4, 2023

Effective

Last Revised on

Content

The Policy presents procedures and structures to addressing the grievances arising from any of its funded operations at the project level or higher.

Applicable to

Issued by

Office of the Legal Counsel



GRIEVANCE REDRESS MECHANISM (GRM)

GRM STRUCTURE AND PROCEDURES

This document presents the CDF's procedures and structures to addressing the grievances arising from any of its funded operations at the project level or higher.

There is nothing to prevent an aggrieved person from directly approaching a figure of authority at the project level (e.g. the project manager or the Borrower/Investee Manager) or the GRM-identified focal point at the project worksite with a complaint, in anticipation of a speedy resolution. This may quickly resolve small issues before they escalate, and the project managers at the site level are encouraged to address potential issues quickly and amicably in this way. Project management should document such complaints and how they have been addressed using the Complaints Log provided in this document. These experiences should be used to modify and improve the approach to the work at hand to prevent a recurrence of similar issues.

It is possible however, that the aggrieved person(s) may be uncomfortable with approaching or confronting the project implementers directly or may be of the view that their concerns will not be addressed as they should be, if they use this direct approach. The GRM provides other options to them.

Any complaint received through the GRM is to be recorded and investigated by the focal point to which the complaint has been directed. The focal point may call on other resources at its disposal to support the investigation. The resources called upon in this way may include staff of his/her organization, staff of the National Focal Point (NFP) in a Member State or CDF, local area authorities or public agencies such as those responsible for development control, environmental management, water resources management, indigenous peoples' affairs, etc.

The focal point to whom the complaint has been directed will immediately inform the entity identified by the aggrieved party as the cause of their concern, that a complaint has been filed. The complaint information should preferably be shared without revealing the origin of the complaint, and certainly if anonymity has been requested by the aggrieved party. It is noted that identification and agreement on appropriate resolution may require dialogue between some or all of the concerned parties (including the Borrower/Investee, FI, NFP, project management, local leaders and local agencies). At all times, assuming the complaint is legitimate, efforts should be made to take corrective action expeditiously, once a reasonable resolution is clear. In the GRM process, relevant national agencies are expected to be reasonably available to review public complaints and advise as required.

The focal point receiving the complaint will maintain a complaints log that records:

- the date and details of each complaint,
- who makes the complaint (if this information is provided),

- the investigation undertaken, and
- the dates and actions taken as a result of the investigation.

The complaints log will also cross reference any non-compliance report and/or corrective action report or other relevant documentation.

Any person or organization may make comments and/or complaints in person, by phone or via post or email using the contact information provided at the end of the Grievance Form attached. The Grievance Form inclusive of project specific contact information should be readily accessible within potentially affected communities and online in accordance with the project GRM agreed between the Financial Institution (FI)/NFP and the Borrower/Investee.

The project's Stakeholder Engagement Plan (SEP) agreed between the NFP/FI and the Borrower/Investee must be implemented to the agreed timeframe, and GRM information disseminated as stipulated in that agreement, to provide the potentially affected public with project information and how to access the grievance redress mechanism, before works commence. Such communications should include contact details of the site project manager and the CDF, NFP and FI focal points.

Borrowers/Investees are to be informed of the availability of the GRM by the FI and/or NFP/CDF, and redress available to them if necessary. This information should also be posted on the websites of the FI and the CDF.

The focal point to whom a complaint has been directed is required to pursue resolution of the issue until it has been satisfactorily resolved unless the complainant has escalated the complaint or opted to pursue another form of redress. The complainant or his/her representative should be kept regularly updated on the progress being made towards resolution, until the matter is closed.

The focal points will maintain GRM information, and their employers will include this information in their regular progress reports and in their annual environmental and social reports.

TIME-FRAMES

The timeframes outlined here are to guide actions to be taken at the level of the FI, NFP or the CDF. As earlier noted, the GCF processes are already defined elsewhere.

The GRM focal point receiving the complaint will immediately log the details in the complaints log maintained at their location.

All grievances should be acknowledged within 5 working days of receiving the grievance once contact information has been provided.

The GRM focal point receiving the complaint will review and attempt to find a solution to the problem within two weeks in consultation with other staff within their agency, other GRM focal points, relevant local agencies and local area leaders. Should resolution require more time, the complainant should be updated every two weeks on progress. The GRM focal point receiving the complaint will report back to the affected persons within 1 week of a solution being determined.

If the complaint upon investigation is found not to be warranted, this conclusion is to be communicated to the complainant, and documented accordingly in the Complaints Log. The complainant has the option to pursue the matter otherwise. If a complainant is not satisfied with the way his/her grievance has been responded to or handled and re-submits it, the receiving focal point will invite representatives of the relevant local community to participate in the process in an effort to identify a mutually agreed solution for implementation.

If unresolved, or at any time the complainant is not satisfied with the progress or the outcome, he or she has the option to escalate the grievance to the next level in the GRM hierarchy, take the matter to the appropriate authorities (government authorities such as those responsible for development control, environmental management, water resources management, etc.) for their intervention, or to pursue redress via the court system.

Details of successfully addressed complaints, complaints deemed unwarranted, and complaints that have been escalated will be documented in the GRM reports of the FIs, NFPs and the CDF.

A summary of complaints, the efforts made to resolve them, and their status will be published by the FIs and CDF on a bi-annual basis.

Table 1 - presents the steps and corresponding time frame for the proposed CDF GRM.

Table 1. Summary of the CDF GRM Process

Stage	Process	Duration
1	Affected person or their representative (community leader, group leader, elected representative) or other concerned party takes grievance to one or other of the following: i. Project focal point on site ii. FI focal point iii. NFP focal point iv. CDF focal point v. GCF GRM	Any time
2	Person with whom grievance has been lodged (GRM focal point) acknowledges receipt of the complaint.	Within 5 days of receipt of complaint
3	Person with whom grievance has been lodged (GRM focal point) reviews and finds solution to the problem in consultation with relevant parties (e.g. project manager, local area leaders and/or relevant agencies). If resolution has not been reached, complainant is updated on progress.	Within 2 weeks of receipt of complaint, or of last update
4	Person with whom grievance has been lodged (GRM focal point) reports back an outcome to the person(s) who submitted the grievance.	Within 1 week of resolution of complaint
If grievance is unresolved or affected person is not satisfied with the outcome		
5	Concerned party escalates grievance to the next tier of authority within the GRM.	Within 2 weeks of receipt of decision in step 4
6	This agency reviews and finds a solution which may include recommendation of dispute resolution, and an appropriate body to oversee.	4 weeks
7	Agency reports back to the complainant.	1 week
If grievance is unresolved or at any stage affected person is not satisfied with the outcome		
8	Concerned party takes grievance to relevant national authorities	
If grievance is unresolved or at any stage affected person(s) is not satisfied with the outcome		
Concerned party can take the matter to court		As per judicial system

REPORTING, MONITORING AND CONTINUOUS IMPROVEMENT

The GRM focal point is required to track and document all activity in relation to the complaint in the Complaints Log. Regular evaluations as to whether the issue is being resolved are to be undertaken, and the approach revised accordingly.

Experiences and lessons learned will be documented and will shape how similar issues are approached in the future.

CDF will monitor the way in which grievances are being handled by the FIs and NFPs and ensure they are diligently pursued and properly addressed within deadlines specified.

Borrowers/Investees, FIs, NFPs and CDF will keep a Complaints Log of all grievances received.

Grievance management reports will be produced by FIs, EA and NFP, and included in their annual environmental and social reports. The NFP will provide information to CDF on all grievances received on a monthly basis, and also in management reports to CDF as part of its regular reporting. CDF will post summary information on its website on an annual basis.

Grievance Report Mechanism template is attached below. All reports to be addressed to:

Contact person: Mr. Arden Warner

Address: 1st Floor East, SKY Mall, Haggatt Hall, St. Michael, BARBADOS W.I.

Tel: 1-246-436-1849 ext: 2226

E-mail: awarner@caricomdf.org