The IUCN Project Grievance Mechanism

In accordance with IUCN social policies\(^1\), IUCN has established a grievance mechanism to respond to complaints related to the implementation of its projects, whether these are GEF-funded projects or not. This mechanism to monitor and evaluate compliance with IUCN policies, principles, and project practices at any stages in the project cycle is based on effective, accessible and transparent procedures to receive and resolve complaints.

The grievance mechanism is designed to enable the receipt of complaints of affected people and public concerns regarding the environmental and social performance of the project. In short, the aim of the mechanism is to provide people fearing or suffering adverse impacts with the opportunity to be heard and assisted. It is designed to address the concerns of the community(ies) with a particular project, identify the root causes of the conflicts and find options for the resolution of grievances. Therefore, it is an essential tool to foster good cooperation with project stakeholders and ensure adequate delivery of previously-agreed results.

The Project Complaints Management System

To advance compliance with the principles of its social policies, IUCN has developed a grievance mechanism, entitled Project Complaints Management System (PCMS) that includes a focal point responsible for assessing compliance with best practices in project design, implementation and execution, and for recommending measures for redress in case of non-compliance.

1. **Eligibility**

Any community, project stakeholder or affected group (consisting at least two or more individuals) who believes that it may be negatively affected by IUCN’s failure to respect its own policies and procedures on safeguards, human rights, community participation and gender mainstreaming may submit at all times a complaint to the PCMS.

Representatives (a person or a local NGO) can submit a complaint on behalf of a community, project stakeholder or affected group. Anonymous complaints will not be considered, however, complainants’ identities will be kept confidential upon their written request.

For IUCN the best approach to resolving grievances involves project management and the affected party reviewing conflicts and deciding together on the way forward in their mutual best interests. This reflects the fact that local and country-level authorities often have better information and understanding relating to the causes of disputes arising from project implementation. “Decide together” approaches are usually the most accessible, natural, unthreatening and cost-effective ways for communities and project management to resolve differences.

Therefore, in order to submit their request through the PCMS, it is essential that complainants have already raised their concerns with IUCN staff locally. To do so, contact needs to be made first with the nearest IUCN Office (regional, national, or project office).

\(^1\) For example, IUCN Policy on Conservation and Human Rights for Sustainable Development (2012 WCC Res 5.099) and IUCN Policy on Social Equity in Conservation and Sustainable Use of Natural Resources (Council, 2000)
If resolution of complaints is not possible at the local or country level through the aforesaid initial contacts with IUCN staff, then it is appropriate to bring forward complaints to IUCN through the PCMS.

The following requests shall not be considered as eligible:

(a) Complaints with respect to actions or omissions which are the responsibility of parties other than IUCN and the relevant executing agencies under its authority;
(b) Complaints filed (i) after the date of official closure of the project, or (ii) 18 months after the date of official closure of the project in cases where the complaint addresses an impact resulting from project activities that was not, and reasonably could not have been, known prior to the date of official closure.

The IUCN PCMS is available and may be accessed through two different addresses on the IUCN public website: at http://www.iucn.org/about/values/ under IUCN’s accountability and values and at http://www.iucn.org/knowledge/ under IUCN’s resources.

Since the PCMS is a part of the IUCN Environmental and Social Management System (ESMS), it will also be available at a later date on the IUCN website page dedicated to the joint IUCN / GEF partnership, entitled “IUCN in the GEF Programme”.

2. Preparing and Filing a Complaint through the PCMS

If not satisfied with the response provided by IUCN and project management locally, a complaint - which will be kept confidential upon an accompanying written request from the complainant - may be made directly to:

- The IUCN Head of Oversight, IUCN Headquarters, Rue Mauverney 28, CH-1196 Gland, Switzerland
  - by post and/or
  - by email at projectcomplaints@iucn.org (or initially)
  - by telephone (at + 41 22 999 02 59)

The written complaint sent by post or email should include the following information (in any language).

- Complainant’s name, address, telephone number, fax number and email address (if the complaint is filled by the representative of a legal person/entity, please provide valid proof of representation).
- Description of the project or programme concerned.
- The harm that is, or may be resulting from failures or omissions by IUCN and/or the project executing agency.
- The names (if known) of relevant IUCN policies or procedures that were/are being allegedly breached.
- List actions taken to solve the issue at stake, including previous contacts with IUCN and/or the executing agency; reasonably detailed description of explanations received by and (if any) actions proposed to complainant(s), and why these are not considered satisfactory by the complainant(s).
- List of supporting documents and attachments, as appropriate.

(see Appendix 1 giving a format for complaints)
3. **Review Process**

The review process addressing allegations of non-compliance with IUCN policies and procedures is designed to investigate such situations and recommend measures for redress.

Upon receipt of a complaint, the IUCN Head of Oversight will, within 5 business days, indicate to complainant whether or not the request is eligible. To achieve this, the Head of Oversight will contact the Director, Policy and Programme and up to three advisers drawn from the IUCN Expert Team on the Environmental and Social Management System to assess whether the complaint is eligible.

If the complaint is eligible, the Director, Policy and Programme, will appoint an internal, but independent of the project, investigator who will notify the local (nearest) IUCN office and executing agency (and its project office) and request, within 10 business days, a detailed response including a plan of action and timetable for assessing the complaint.

The investigator and the Coordinator, Environmental and Social Management System, will review the proposed action plan and timetable for adequacy.

Should the IUCN Office and executing agency confirm that the complaint is valid under the eligibility provision set forth above, the agency executing the project will then implement the action plan and work with complainants and relevant stakeholders to develop remedial measures for the issue(s) identified, including a detailed description of agreed corrective actions, timetable for implementation and progress reports.

The Coordinator, Environmental and Social Management System, will again review the remedial measures to assess adequacy and cost effectiveness.

The agency executing the project, in collaboration with the relevant IUCN office, will produce an executive summary of the complaint, the process followed and the recommendations reached, which will be provided to all stakeholders involved, the investigator and the Director, Policy and Programme. Recommendations become part of the project’s implementation plan.

4. **Maintaining records and monitoring actions**

Under the Director, Policy and Programme, IUCN will ensure that:

- the Global Planning, Monitoring and Evaluation Unit processes reports provided by the executing agency on progress made to implement recommendations and coordinates, in cooperation with the Head of Oversight Unit, all necessary monitoring tasks.

- IUCN maintains a database of complaints filed and a detailed record of the remedial measures agreed. Periodical reports on compliance with IUCN’s policies and procedures will be posted on the website for consideration by IUCN Members and partners, and the general public. Regular reports will also be made to the IUCN Council.

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2 If confidentiality has been requested, complainants will be treated like any other stakeholder. At the end of the process, recommendations will be communicated confidentially to the complainant directly by the Head of Oversight.
5. **Responsibility of executing agencies**

The agencies executing GEF projects in the field on behalf of IUCN will ensure that signage which is easily legible is erected on each project site, displaying clear information allowing anyone to contact IUCN in case of concerns or complaints. See Appendix 2 for guidance on signage.

The executing agencies will also ensure that students in at least one school in proximity to the project site are given leaflets providing information on the project's nature and objectives, as well as clear guidance on how to contact IUCN in case of concerns or complaints over negative impacts of the project.

6. **Protection against retaliation**

IUCN undertakes, and will require its executing agencies to undertake, that no retaliatory action shall be taken (or condoned, as applicable) against any of its staff members or any staff member of an executing agency, because he or she made a disclosure on the reasonably expected environmental and/or social effects of the execution of a particular project. Staff members who reasonably believe that they have been victims of any such retaliation should follow the steps set out in section 2 - Preparing and Filing a Complaint through the PCMS.
Appendix 1 - Suggested Format for Complaint

To: The IUCN Head of Oversight, IUCN Headquarters, Rue Mauverney 28, CH-1196 Gland, Switzerland
- by post and/or
- by email at projectcomplaints@iucn.org (or initially)
- by telephone (at + 41 22 999 02 59)

1. We (insert name(s) and name(s) of institutions) live and/or represent others who live in the project area (insert name of project or name of area, country).

2. The following project (insert description of project) implemented by IUCN and (name of executing agency) is a cause for concern as a result of failures or omissions (insert which ones):

   ___________________________________________________________________
   ___________________________________________________________________
   ___________________________________________________________________

3. Description of the harm that is, or may be resulting from failures or omissions by IUCN and/or the executing agency:

   ___________________________________________________________________
   ___________________________________________________________________
   ___________________________________________________________________

4. List (if known) the relevant IUCN policies or procedures you believe have not been followed:

   ___________________________________________________________________
   ___________________________________________________________________
   ___________________________________________________________________

5. List the actions taken to solve the issue(s), including previous contacts with IUCN and/or executing agency staff, describe explanations given and (if any) actions proposed, and why these are not considered satisfactory:

   ___________________________________________________________________
   ___________________________________________________________________
   ___________________________________________________________________

6. We request IUCN to investigate these matters according to the IUCN Project Complaints Management System.

7. Signatures: ___________________________ Date: _______________

8. Contact address(es), telephone number(s), fax number(s) and email address(es):

   ___________________________________________________________________
   ___________________________________________________________________
   ___________________________________________________________________

9. List of supporting documents and attachments, as appropriate.

Important note: if complaint is filled by a representative, please provide proof of representation.
Appendix 2 – Guidance on signage at project sites

The agencies executing GEF projects in the field on behalf of IUCN will ensure that signage which is easily legible is erected on each project site, displaying clear information allowing anyone to contact IUCN in case of concerns or complaints.

Suggested text as follows:

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(Title of Project)

This project is executed by .................................. (name of executing agency, complete office and email addresses, phone number(s), website), and implemented by IUCN, International Union for Conservation of Nature and Natural Resources (IUCN).

In case of concerns or complaints regarding the execution of this project, you may contact IUCN through any of the following:

- IUCN Regional or Country Office (please insert the nearest IUCN office, with postal and email addresses and phone number(s)); or
- IUCN Headquarters, Rue Mauverney 28, 1196 Gland, Switzerland, +41 22 999 00 01; email: projectcomplaints@iucn.org; website: www.iucn.org); and/or
- the dedicated IUCN Grievance Mechanism available on the Internet at two different addresses on the IUCN public website, at http://www.iucn.org/about/values/ under IUCN’s accountability and values, and at http://www.iucn.org/knowledge/ under IUCN’s resources.

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