



ACCOUNTABILITY & GRIEVANCE MECHANISM (AGM) TEMPLATE

For use with high and medium-risk projects

The CI Safeguard System requires all projects to have an Accountability and Grievance Mechanism in place so that project-affected communities, individuals, and other stakeholders may raise a grievance at any time to the Project Team, CI, or the donor on non-compliance with the CI-ESMF. Following the requirements outlined in Policy 4, affected communities should be informed about this possibility, and contact information of the respective organizations at relevant levels should be made available publicly. Affected communities and individuals should also be assured that their grievances will be addressed in a timely manner, they will not face retaliation for submitting a grievance, and they have the option to request confidentiality.

This Appendix provides several resources for designing and implementing a project-level AGM in Category A and B projects. For Category C (low risk) projects, please follow [this guidance](#).

- A. Accountability & Grievance Mechanism Template
- B. Site Level Grievance Reporting Form Template
- C. Grievance Mechanism Checklist

Templates A & B will guide the design a Project Level AGM Procedure that meets the requirements of Policy 4 but may be tailored to the Project context and specific risks or impacts. The Project AGM procedure is intended for dissemination among project stakeholders. The Project procedure may reference and be aligned with Policy 4 of the ESMF, as well as CI's Global Grievance Committee procedure.

A. Accountability & Grievance Mechanism Template

SECTION I: Project Information

PROJECT TITLE:			
PROJECT ID:		PROJECT DURATION:	____ months
PROJECT TEAM:			
PROJECT START DATE:	<i>(mm/yyyy)</i>	PROJECT END DATE:	<i>(mm/yyyy)</i>
AGM PREPARED BY:			
DATE OF (RE)SUBMISSION TO PDM/ESA:			
AGM APPROVED BY:	<i>(To be completed by PDM ESA)</i>		
DATE OF APPROVAL:	<i>(To be completed by PDM ESA)</i>		

SECTION II: Introduction

Introduce your AGM by providing a short summary of your project and its main activities, any anticipated grievances, how you will ensure that stakeholders are aware of the mechanism, and what system will be put in place to ensure that the mechanism is working effectively and efficiently.

SECTION III: Scope of grievance mechanism

Explain in this section:

- *Which people would be eligible to submit a grievance (ref. project area of influence)*
- *The types of grievances that might be expected for this project*
- *How will the grievance be screened to ensure it is related to the CI project (see supplemental guidance below)?*
- *How the grievance will be screened for risk to determine CI's response (ref. Policy 4 risk criteria)?*
- *How will the mechanism ensure transparency and fairness?*
- *How will the mechanism ensure confidentiality?*
- *How will the mechanism ensure that both women and men feel comfortable accessing it, particularly for grievances involving GBV or SEAH (see supplemental guidance below)?*
- *How does the project cater for the inclusion of other vulnerable and marginalized groups?¹*
- *How will the project protect the grievant from retaliation for submitting a grievance?*
- *How will existing dispute resolution practices (for example with Indigenous Peoples) be incorporated as part of any grievance redress procedure?*
- *How much time is recommended for different steps of handling a grievance (see supplemental guidance below)?*

¹ Vulnerable and marginalized refers to certain people can be more susceptible to harm than others by virtue of disability, state of health and disability, Indigenous status, gender or gender identity, sexual orientation, religion, race, ethnicity, age, language, political or other opinion, citizenship, property, birth, economic disadvantage, geographic location, or other social condition. Certain vulnerable individuals and/or groups may include people or groups in vulnerable situations including the poor, the landless, the elderly, single-headed households, refugees, internally displaced persons, natural resource dependent communities or other displaced persons who may not be protected through national legislation and /or international law.

Supplemental guidance for completing this section:

- **Eligibility** will depend in part on the project’s geographic, programmatic, or demographic scope. For example, the project may intentionally define an affected person or stakeholders to include only a certain group in certain jurisdictions, making those people not belonging to that group, or living outside that jurisdiction, ineligible to submit a complaint. A project affected person is typically a member of community or organization that the project intentionally identifies as a beneficiary or partner. These criteria can be defined geographically or by a list of partners. Eligible stakeholders can be those residing in areas designated by the Project work plans as intended beneficiaries. Indirect beneficiaries should also be considered eligible.
- **Does the grievance directly relate to the project?** Is the complaint associated with an activity or action supported by the Project? The grievance may be related to the actions of the government (enforcement of laws/regulations), or a private company (encroachment on land or resources) and therefore may not be the responsibility of the project.
- **Good faith grievances.** Has the grievant acted with transparency and integrity in submitting the grievance (e.g., for example, making prior efforts to inform the project staff and/or implementing partner about the grievance and has attempted to work with them towards identifying a solution by following the conflict resolution framework)?
- **Is the grievance frivolous, malicious, trivial, or generated to gain competitive advantage?** If CI believes this to be true, the complaint may be found to be ineligible.
- **Timeline:** If the grievance happens more than two years after project closing date, it may not be eligible.
- Grievance related to **procurement** of good and services (e.g., consultant services), allegations of fraud or corruption by project staff or about non-operational matters (such as finance and administration) should be directed to CI’s [Accountability and Grievance Mechanism](#).
- Grievances that are exclusively about the adequacy or suitability of CI safeguard policies are also not eligible; these should be directed to the PDM ESA Team.
- Are there **other organizations better placed to address the grievance?** Particularly for complaints that may not meet the eligibility criteria, the Project may conclude and refer the grievant to a more appropriate organization or institution.

Types of common grievances. Grievances may involve issues attributable to Project activities and pertain to non-compliance with the relevant Project safeguard policies. Potential grievances may involve (but not exclusively):

- participation in or exclusion from a project led consultation, or process of Free, prior, and informed consent.
- participation in or exclusion from a project funded activity, a project hiring decision, a grant award or related funding decision;
- discriminatory exclusion from the project based on an individual's identity - for example, based on disability, religion/belief, gender, sexual orientation, race and ethnicity etc.
- harm to persons related to effects of Project activities (waste or water pollution, noise, dust, disruption, etc.)
- harm to nature that in turn may adversely affect people due to effects of Project activities (flora and fauna, habitat degradation or destruction, water source or waterways)
- adverse risks related to community health, safety, and security (e.g., use of security personnel,

SECTION IV: Grievance Process Time Limits

Efficiency in response to and handling of grievances is critical to accountability. For all levels of the AGM Process (site/country level, PMU level or CI Global Grievance Committee level), four recommended time limits highlighted in **Table 1** (below) ensure the complainant has timely knowledge of the grievance handling process. These recommended times are subject to exemptions stemming from the nature of the grievance, the geographic challenges of communication with the complainants located in remote places, and the complexity related to actions proposed to investigate or resolve the grievance. The AGM Coordinator can advise when recommended time limits are not feasible and can be adjusted.

Table 1. AGM Time Limits (recommended)

Stage of the Grievance Redress Process	PMU Level Procedure (for low /medium risk grievances)
A) <u>Grievance Receipt.</u> Acknowledgement of the Grievance by CI to the complainant	Written communication to the complainant CI AGM Coordinator will acknowledge complaints within 10 business days of receiving the grievance from any level.
B) <u>Grievance Response/Solution Development.</u> Communication of the proposed response or solution by CI to the complainant with agreement to proceed or not.	Written communication of the proposed response by the CI AGM Coordinator within 25 business days after acknowledgement of the grievance (A).
C) <u>Grievance Response Implementation.</u> Upon agreement on the proposed response, the results of the response implementation, including any further assessment, will be reported to the complainant	the CI AGM Coordinator will communicate the results of the implementation actions to the complainant and other stakeholders within 25 business days of acknowledging the grievance (B)
D) <u>Grievance Close Out.</u> Upon completion of the grievance resolution actions, a final report will be sent by to the complainant and all involved parties.	Written communication by the CI AGM Coordinator to complainant within 10 business days of agreement to close the grievance (C)

SECTION V: Awareness, Accessibility and Capacity

<i>How and when will the project disseminate the AGM to stakeholders? How would it be communicated to stakeholders that speak a different language, might be illiterate, are in hard-to-reach places or other vulnerable groups such as women, ethnic or religious minorities migrants or persons with disabilities?</i>	<i>Examples of how: via the project's website, at the inception meeting with stakeholders, printed and posted on notice board in community center, radio announcement, flyers, posters, SMS/text/WhatsApp messages, illustration/animated video, etc. Any materials will be read to project beneficiaries at their request.</i>
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	<i>Examples of when:</i> at the end of every presentation or community engagement, at the start of the implementation phase, before the end of the first quarter during implementation phase, etc.
<i>How will capacity of designated AGM point persons be assessed and strengthened to ensure local dispute resolution practices will meet the requirements of Policy 4</i>	<i>Examples of how:</i> training was provided to Project stakeholders to access or play a role in receiving or handling grievances. Particular significance is given to training for assessing eligibility and risk, especially for responding to grievances associated with GBV.
<u>Name and designation of person(s) to which grievances can be addressed:</u>	
<i>Physical address of person(s) above or location of grievance collection box:</i>	
<i>Telephone/Fax:</i>	
<i>Email:</i>	
<i>Website/software application:</i>	
<i>Radio Frequency, if applicable:</i>	
<i>Other²:</i>	
<p>Supplemental Guidance:</p> <ul style="list-style-type: none"> • Awareness of the AGM and how it works is essential for access. The AGM Manager should explain the grievance handling procedure and the Project safeguard policies in a manner, language and format that suits local context and is culturally appropriate. • The full contact information for receiving complaints should be made widely available through announcements at meetings, on websites, in posters or brochures, radio or alternative outreach methods referring to the Project. Where literacy is a barrier, the AGM materials will be read to stakeholders at their request. <p>For efforts to disseminate how the Grievance Mechanism works, each Project Team will provide the following information</p> <ul style="list-style-type: none"> • Basic information about the complaint review procedures; • Instructions for how to file a complaint; • (if requested) A summary of the registry of complaints, including basic information about the complaint and the complaint’s status; and • (if requested) Draft and final terms of reference and investigation reports; <p>Addressing Grievances involving risks of gender-based violence (GBV) or SEAH. Due to the sensitivities of reporting GBV complaints, specific measures in the site-level procedure. For high and medium risk projects, all grievance recipients (including Community or Country-level AGM Focal Points) shall</p>	

² A grievant may not be able to write or have access to telephone/email services, or even travel to your office. Indicate how you plan to accommodate such circumstances.

be trained to take a victim/survivor-centered approach and engage in empathetic and non-judgmental listening that ensures the AGM is accessible to women or girls, confidential and secure. **CI SEAH Policy states that any CI Staff or Delivery Partner who suspects, experiences, observes, or becomes aware of conduct that violates this Policy, is obligated to report the possible violation immediately through CI's Grievance Committee.**³ CI is committed to treating all victims with dignity and respect, to listening and being led by the wishes of the victim where possible and appropriate to do so.⁴ A roster of 2-3 country level GBV referral experts with contact information should be prepared and available to all AGM Focal Points. Consultation with the appropriate resource person in the CI PDM ESA is recommended to determine the appropriate response to any GBV/SEAH related complaints.⁵

All persons designated to play a role in the AGM should have adequate training provided by the Project to know what the risks for GBV are and why such complaints require a different approach. A survivor-centered approach may mean that no action is possible. Reporting the incident to authorities (police, local law enforcement) must only be done with the informed consent of the survivor choosing this is the most useful action.

For additional information on handling Gender-based Violence as a project risk, see [CI Guidelines for Recognizing and Responding to GBV in Conservation Programming](#).

SECTION VI: Grievance Acknowledgment and Follow-up

- *Describe the institutional/organizational structure to handle grievances at the community/field site or project level?*
- *Will the grievance be assigned/directed to a specific project staff or committee to deal with the grievance?*
- *How will your mechanism receive and acknowledge the receipt of the grievance?*
- *(If not within the stipulated 10-day time period) How long will it take for this communication of written acknowledgement to be given to the grievant?*
- *(if not within the stipulated 25-day time period) For low and medium risk grievances, how long will your mechanism take to provide a proposed resolution to the grievant?*
- *Will periodic updates throughout the first stage of the process be provided to the grievant and other Parties?*

³ This would be the CI Global Grievance Committee using Ethics Point. See section 2.3 below.

⁴ CI PSEAH Policy (2021)

⁵ See CI Gender and Social Equity Sharepoint for GBV guidance in English and Spanish.

SECTION VII: Processing

Describe how your mechanism will process the grievance.

- *How will the grievance be verified? Will there be site visits, face-to-face meeting, etc.*
- *How will the mechanism deal with grievances that are ineligible?*
- *How will risk categorization/prioritization system be assessed based on the nature of the grievance?*
- *How will high-priority or sensitive grievances be dealt with?*
- *(if not within the stipulated 25-day time period) For low and medium risk grievances, how long will your mechanism take to implement the proposed resolution for the grievant?*
- *(if not within the stipulated 10-day time period) For low and medium risk grievances that reach closure, how long will your mechanism take to send a final report to the complainant and all involved parties?*
- *Describe how grievances get escalated depending on their seriousness or inability to be resolved the project level?*

If the project fails to address the grievance, what steps would be taken to achieve a resolution? Will the project set up an arbitration process? Are there national mechanisms that the project can use? If there are national processes, do the communities and other stakeholders have faith in them, know about them and have easy access to them, and are they likely to use them?

Supplemental Guidance:

- Grievances can be submitted in written form or electronically, by fax, email, regular mail, SMS text, Whasapp or in person. Grievances can be submitted through a complaint box⁶ (if provided). Grievances can also be submitted by a designated third party (e.g. through a local organization or person represented the aggrieved party). If a complainant contacts the PMU by phone, the staff person receiving the call will need to ensure the AGM Coordinator follows up with a written accounting of the complaint that is sent to and communicated to the complainant and acknowledged as accurate—to create documentation of the complaint. Where possible, communication to the grievant will be read to them upon their request. The confidentiality of the grievant will be protected, if requested.
- All complaints received will be entered into an electronic database to allow for tracking and documenting of any and all steps taken in the AGM process. This database will also be used by the Project to generate analysis of the grievances received, including the number of grievances under investigation, or closed out, with attention to tracking DEI grievances.

⁶ Project beneficiaries should choose where the Complaint Boxes will be placed. Project **AGM Coordinator** is responsible for collecting complaint forms, entering them into the AGM database, **resolving or referring complaints** (in coordination with relevant agencies), and delivering responses (or making referrals)

- The grievance electronic database should ensure that only designated Project staff have access to the information to ensure the integrity, security, and discretion necessary for the legitimacy and confidentiality of any grievance handling process.
- Training for stakeholders may be needed to ensure they can access the AGM. Capacity building may also be needed if community persons are designated to play a role in receiving or handling grievances in a manner consistent with the CI-ESMF.
- **Particular attention should be given to training for assessing eligibility and risk, and for responding to grievances associated with GBV and other DEI related issues.**
- A tiered system could be to first address the grievance at the field site level; second level can be at the Project Management Unit; and third level can be CI's Global Grievance Committee, through the EthicsPoint Hotline (See Policy 4). However, a grievant may select to submit the grievance to any of these options and should have access to contact information to be able to do so.
- A first written response to the grievant should typically provide:
 - a clear explanation of the response and why it is being proposed;
 - a resolution process that will indicate which entity within CI will handle the grievance;
 - a request for agreement on the proposed remedy or approach by the grievant;
 - Alternative choices for the grievant (further dialogue, participation in additional assessment or engagement process).
- Grievance responses, whether direct action or further investigations, should consider the complainants views about the desired outcomes or process for grievance resolution. The response may suggest a specific remedy or an approach for how to settle the grievance. The PDM ESA Team will have the responsibility to review the response before being communicated to the grievant.

SECTION VIII: Documentation

- *How will grievances be recorded?*
- *Please describe or provide a copy of a grievant form*
- *Please describe the database to record and track the grievances received*
- *How and where would the grievances database and supporting evidence be stored? And for how long will they be kept?*
- *How will the personal identifiable information of the grievant be kept secure, and who within the team will have access to it?*

Supplemental Guidance:

- **See Section B (below) for a sample Grievance Reporting Form.** The submission of grievances should include the following information:
 - name, designation, address and contact information of the grievant and their representative(s)
 - if a grievance is made through a representative, the name/s of the person/s on whose behalf the complaint is made and evidence of the authority to represent them;
 - whether the grievants choose to keep their identities confidential;
 - a brief description of the Project funded activity, location, and date.
 - a description of the grievance including location and data/time of its occurrence;
 - does the grievance relate to equality, inclusion or discrimination?;
 - if appropriate, a brief explanation of the claim that alleged harm is or will be caused by the Project alleged failure to follow its operational policies and procedures during the design or implementation of activities;
 - if possible, identify which Project operational policies or procedures have not been complied with; and
 - a brief description of the risks or impacts of the occurrence.
- The Project Team will provide sex-disaggregated and DEI disaggregated data on complaints. The status of complaints received, processed, and resolved for partners participating in the Project will be reported annually.

SECTION VIII: AGM Monitoring and Reporting

Describe how will you track and ensure that the mechanism is working. It is important to recognize that lack of reported grievances does not mean that there are none, it may indicate that the mechanism is not working properly. Describe how you will account for this possibility.

The project is expected to report on a quarterly basis (using the donor reporting template), progress made towards the implementation of the grievance mechanism, including but not limited to the number of grievances received and the outcome of the grievance process.

On an annual basis, the following the recommended minimum indicators below are to be reported. The project can include other appropriate accountability and grievance indicators in addition to the CI ESMF minimum indicators.

Indicator	Baseline	Target
1. Number of conflict and complaint cases reported to the project's Accountability and Grievance Mechanism		
2. Percentage of conflict and complaint cases reported to the project's Accountability and Grievance Mechanism that have been resolved		
3. Number or percent of reported eligible grievances involving DEI		

Budget

Consider budget, staffing, materials, translation/translator, radio time to announce the mechanism, payment of a post office box where people can submit grievances to, a dedicated cell phone or other phone number, etc

Annex 1: Site-Level Grievance Form Template

Full Name:	
Sex:	
Address	
Contact Information (Phone, email):	
Contact Preference	<input type="checkbox"/> By mail (please provide mailing address): <input type="checkbox"/> By telephone (please provide telephone number): <input type="checkbox"/> By e-mail (please provide e-mail address):
Preferred language for communication	<input type="checkbox"/> <i>[insert other applicable language(s)]</i> <input type="checkbox"/> English <input type="checkbox"/> Other, please specify:
If a complaint is made through a representative, the name/s of the person/s on whose behalf the complaint is made.	
Does the aggrieved party wish to keep their identity confidential?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe the grievance. What happened? Where did it happen? Who did it happen to? How is it related to the project? What is the result of the problem?	
Date/time of its occurrence: _____	<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)
What would you like to see happen to resolve the problem?	

Please return grievance form to: **Provide contact person and address.**

Annex 2: Grievance Redress Mechanism Checklist

The following checklist⁷ describes the features of a complex AGM and can be used to determine whether a grievance mechanism conforms to good international practice.

	Yes	No
System issues		
Does the project invite feedback/grievances?		
Does the organization have a policy on grievance redress?		
Is the policy available to all staff, beneficiaries, and potential users?		
Is the policy written in the local language(s)?		
Does the grievance mechanism have a clearly understood procedure for people to provide feedback and/or submit grievances?		
Does the grievance mechanism have a statement of who is responsible for dealing with feedback/grievances?		
Does the grievance mechanism have procedures for resolving or mediating and investigating grievances depending on their seriousness and complexity?		
Does the grievance mechanism have a system for keeping complainants informed of status updates?		
Does the grievance mechanism have a system for recording feedback/grievances and outcomes?		
Does the grievance mechanism have procedures for protecting confidentiality of complainants?		
Staff management		
Is there a grievance manual for staff?		
Do the grievance policy and/or procedures provide guidance on a grievance is?		
Do the grievance policy and/or procedures provide guidance on what information to collect from complainants?		
Do the grievance policy and/or procedures provide guidance on what remedies can or should be used to resolve grievances?		
Are the grievance policy and procedures communicated to all staff?		
Are adequate resources allocated for the grievance mechanism to function effectively?		
Does the organization provide training on grievance management to staff?		

⁷ See World Bank, Environmental and Social Framework (ESF), <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

Communication to grievance mechanism users		
Are users told how to submit grievances/feedback?		
Is an information brochure on the grievance mechanism available to users?		
Are feedback/grievance forms available to users?		
Are grievance forms or signs displayed prominently and readily accessible?		
Are contact details of staff receiving feedback/grievance published and displayed in public areas?		
Is information on grievance management available in in local languages or in a way that is understandable by all stakeholders?		
Are users able to submit grievances/feedback in writing?		
Are users able to submit grievances/feedback by email?		
Are users able to submit grievances/feedback by telephone?		
Are users able to submit grievances/feedback in person?		
Are users provided with assistance to submit feedback/grievances where needed?		
Can the grievance mechanism be accessed free of charge?		
Are users promised confidentiality?		
Are users informed about the appeals process?		
Feedback/grievance reporting		
Are all feedback/grievances recorded?		
Are grievances/feedback logged and documented?		
Are inquiries/suggestions and recommendations recorded?		
Are the outcomes and responses to all grievances/feedback recorded?		
Business standards		
Are there business standards in place for the process and timing with which grievances/feedback are dealt with?		
Is receipt acknowledged within a stipulated time frame?		
Are the grievances supposed to be resolved within a stipulated time frame?		

Is there a quality control system in place to check if all grievances have been dealt with or acted upon?		
Is there a quality control system in place to check if all aspects of a grievance have been addressed?		
Is there a quality control system in place to check if all necessary follow-up action has been taken?		
Analysis & feedback		
Are regular internal reports on grievances/feedback produced for senior management?		
Do grievances/feedback reports include data on numbers of grievances/feedback received?		
Do grievances/feedback reports include data on compliance with business standards?		
Do grievances/feedback reports include data on issues raised in grievances/feedback (including DEI).		
Do grievances/feedback reports include data on trends in grievances/feedback over time?		
Do grievances/feedback reports include data on the causes of grievances/feedback?		
Do grievances/feedback reports include data on whether remedial action was warranted?		
Do grievances/feedback reports include data on what redress was actually provided?		
Do grievances/feedback reports include data on recommendations/strategies to prevent or limit future recurrences?		
Are reports about grievances/feedback made public, periodically?		