

Project Grievance Mechanism

Briefing Note

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Project Grievance Mechanism

1. Introduction

A grievance or complaint is an expression of dissatisfaction with the project activities (actual or perceived), typically referring to allegations of a specific incident or impact, though also including concerns that stakeholders feel would be best handled through the project grievance mechanism (therefore defining them as a grievance). A complainant may be seeking a specific solution. Project activities include project company actions as well as contractor and subcontractor actions. The terms "grievance" and "complaint" can be used interchangeably.

Despite systematic stakeholder engagement, grievances can still arise from a multitude of project-related issues and can carry different levels of complexity depending on the contextual and other risks involved. An effective¹ grievance mechanism to receive and facilitate the resolution of stakeholders' grievances is therefore considered a crucial component of an effective stakeholder engagement system, in particular about the client's environmental and social performance.

Grievances caused by the project are more effectively and efficiently addressed as soon as they are raised by a complainant, via the Client's grievance mechanism, before they escalate to other channels. An effective mechanism also avoids eroding stakeholder trust where grievances are left unresolved and enhances the project's understanding of its contextual risk and the management of its impacts from monitoring of trends arising from grievances.

The Environmental and Social Requirement (ESR) 10 Guidance Note breaks down the EBRD Environmental and Social Policy (ESP) requirements related to grievance management, focusing on the 'what' is required and 'why' it is important. This Briefing Note provides additional guidance on the 'how' of setting up and implementing a project grievance mechanism, providing practical tips on the implementation in a project context, including sample documents and tools for project-level grievance mechanisms. It supplements the ESR 10 Guidance Note².

2. Scope of a grievance mechanism

Reference: ESR 10, paragraph 36.

A grievance mechanism is the process through which affected parties (including individuals, communities and groups) and other stakeholder grievances are received, acknowledged, investigated and responded to. The grievance mechanism should be accessible to all stakeholders who consider themselves affected by the project activities undertaken by EBRD clients directly or by their contractors and subcontractors.

¹ As outlined by the criteria in Principle 31 'Effectiveness Criteria for Non-Judicial Grievance Mechanisms' of The United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework". Available at: https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf and [Business and human rights - Introduction](#)

² ESR 10 Guidance Note is available at: https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/environment---sustainability/implement-performance-requirements/esrs-2025/EBRD_ESR10_Guidance_Note_Stakeholder_engagement.pdf

Grievance mechanisms should be used for grievances and complaints relating to project activities, including concerns that stakeholders feel would be best handled through the project grievance mechanism. Project grievance mechanisms are not intended to handle other concerns, issues and requests from stakeholders. The concerns identified or requests raised by the community should be captured as part of regular stakeholder feedback and should be recorded, considered and responded to through the stakeholder engagement programme. The handling of all stakeholder queries, concerns and issues should be taken seriously. If they are not captured and responded to effectively, they can escalate to grievances. Privacy and confidentiality should be maintained as further outlined in Section 4.

Annex 1 provides clarification of key terms related to the scope of a project grievance mechanism.

3. When to set up a grievance mechanism

Reference: ESR 10, paragraph 35.

✓ **A grievance mechanism should be set up as early as possible in the project cycle:**

- It should be set up during the pre-construction (design/planning/pre- and during feasibility) stages wherever practical
- Continue to be in place during construction, operations and decommissioning, and possibly for a short period post-closure for projects with significant impacts
- The grievance mechanism should be in place during the Environmental Impact Assessment / Environmental and Social Impact Assessment (EIA/ESIA) phase and ideally be available from the beginning of such permitting processes that involve field studies and interaction with communities
- For all projects involving land acquisition a grievance mechanism must be in place before the census of affected persons and assets, as this particular phase is likely to give rise to numerous concerns and grievances. In some jurisdictions the cut-off date may be before the full census. The grievance mechanism should be in place before any cut-off date is established for the land acquisition and valuation process. The ESR 5 Guidance Note contains further guidance on engagement during land acquisition.

Requests to establish a grievance mechanism may generate questions from Project personnel. Typical questions and advice on how to respond are outlined below:

Typical questions	Responses include:
<i>“Why is a project-specific grievance mechanism required when we are operating in a country governed by rule of law and people can resort to existing judicial or administrative remedies?”</i>	• judicial or administrative remedies may entail upfront expenses that are beyond some people's resources. The costs involved can be a barrier to some people to seek redress through such mechanisms. These remedies can be slow and complex to access and navigate without support (for example, legal advice which can be expensive), especially for vulnerable groups and individuals • vulnerable groups and individuals may be nervous or resistant to using judicial or administrative remedies • a non-judicial project grievance mechanism should reduce exposure to costly and lengthy litigation, as well as reputational risks • some grievances can be resolved quickly, which is good for both the complainant and project. If a project grievance mechanism is not available simple grievances may escalate

	providing a mechanism to receive, investigate and respond to grievances in a systematic, transparent and timely way can improve stakeholder trust and relationships
<i>“If we set up a grievance mechanism, will this encourage people to complain, result in lots of grievances and have a negative impact on our reputation?”</i>	- without a grievance mechanism generally, a project does not have records to judge the nature and number of complaints - complaints may be perceived to increase once a grievance mechanism is available and accessible to stakeholders. However, this can often be because the mechanism provides a route to capture and handle grievances. Without a clear mechanism grievances are often left unresolved, with some grievances which could be resolved easily and quickly being left to escalate - having a transparent process to receive, investigate and respond to grievances should reduce the risks of grievances escalating with associated increase in risk of reputational damage, project delays and work stoppages, leading to increased project cost.

4. Setting up a grievance mechanism

Reference: ESR 10, paragraph 36.

✓ Proportionate grievance mechanism

A grievance mechanism should be proportionate to the risks and impacts of a project. Contextual factors such as political environment should also be considered when designing the mechanism and identifying the resources to implement the mechanism. Figure 1 and Box 1 provide further guidance on these considerations.

The ESR 1 Guidance Note contains further guidance on contextual risk identification.

Figure 1. Considerations for setting up a grievance mechanism



Box 1. Case study: understanding project context to inform the grievance mechanism

- Road-widening project where single-lane road is being upgraded to a dual-lane motorway in a heavily populated area. The widening will require land acquisition and result in economic and physical displacement.
- Legacy issues exist comprising significant community concerns about the noise, air pollution and road safety from the existing road. The upgrade of the road to a motorway might be likely to give rise to significant numbers of complaints with respect to these legacy issues. Thus, the resources in the project team should have some capacity and training ideally in these topics (or access to a technical expert for support). Given the legacy of significant community concerns the project should consider the use of an independent third party in the appeals process and have mediation services available.
- Impacts on the community will peak during construction so defining the contractors' role and responsibilities in grievance management is very important.
- The linear nature of the project should be considered when deciding the way to inform the community about the grievance mechanism and the channels through which grievances can be raised.
- The communities along the route include groups from certain minority ethnic groups, who speak various languages and have specific cultural practices. Grievances are required to be handled in a culturally appropriate manner, therefore understanding the context of the affected communities along the route is important in designing and implementing the grievance mechanism. Information on the grievance mechanism and the forms to receive grievances should be available in relevant local languages. It may be appropriate for CLOs to be available in the communities along the route, and where possible for them to have the relevant language skills. Engagement should be undertaken sensitively with the communities to understand more about their cultural practices so the grievance mechanism can be designed appropriately.

Table 1 describes the elements that should be in place within a grievance mechanism, as a minimum, and where a more enhanced grievance mechanism may be appropriate for some projects.

Additional guidance on anonymous grievances, escalation of critical complaints/grievances, vulnerable groups/individuals, gender considerations, and on Government-led projects is also provided in this section.

ESR 10 Guidance Note - Sections 3.1.3, 3.1.6 and 3.8.3, describe good practice approaches to manage confidentiality, protecting personal data and avoiding retaliation during stakeholder engagement, including within a grievance mechanism.

Table 1. Application and complexity of grievance mechanism

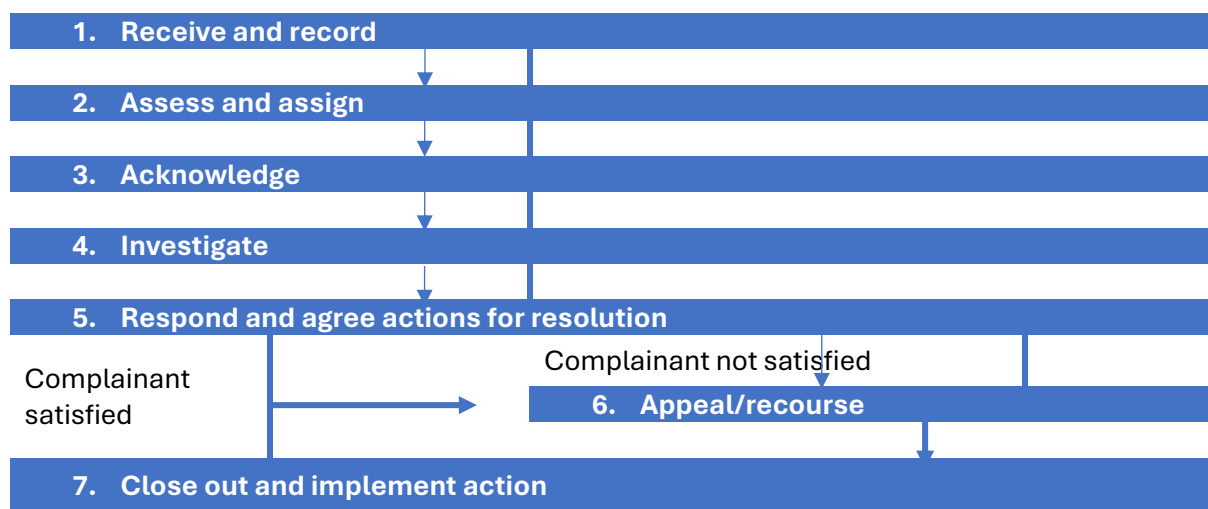
Grievance mechanism (minimum)	Grievance mechanism (enhanced)
- for Category B and C projects, generally. However, for Category B projects depending on the project context and impacts some elements of the grievance mechanism may need to be enhanced - may not have dedicated resources to implement grievance mechanism, may have to share this responsibility across a few functions. Grievance mechanism should include as a minimum: - it should be publicised and disclosed in a format and language(s) that is/are readily understandable to the affected stakeholders (could include use of printed documents, face-to-face, traditional media and digital and social media platforms) and any feedback taken into consideration in its design and implementation - clear channels for grievances to be raised and received, for example: in person; Toll-free grievance hotline/dedicated telephone number, email, text messaging, postal or web-based online filing of grievances; complaint boxes in public areas; or third parties. These channels must be free to access and use by complainants and readily accessible - the channels to receive grievances and engage with complainants should be gender responsive and give further consideration of vulnerable people's needs - Clearly documented process, with kept chronology of events and time frame to acknowledge, assess and resolve grievances while keeping complainants informed of progress - flexibility to resolve grievances quickly where appropriate - in order to handle grievances in a discreet manner: maintain confidentiality and protect privacy of complainants, allow anonymous grievances to be raised and incorporate measures to prevent retaliation. Including in policies clear statements to the effect that actions that amount to retaliation will not be tolerated and will be investigated - customary dispute settlement processes and forums should be considered in development of the grievance mechanism - not prevent access to judicial or administrative remedies - include as a minimum in the grievance mechanism what will happen should the complainant not be satisfied with the proposed resolution - monitoring and analysis of trends.	- for Category A projects, large, new or major expansion projects, projects involving land acquisition and projects with significant community concerns or complex issues an enhanced grievance mechanism should be established Minimum requirements for a grievance mechanism (minimum) plus the following enhancements depending on the project: - dedicated resources to implement the grievance mechanism, including grievance officer and CLOs - additional channels to receive grievances may be required, reflective of the project context and risks. These must be free to access and use by complainants - include dedicated reporting channels, trained personnel, specialist support and response procedures for certain complaints, such as: - those relating to gender-based violence and child sexual abuse and exploitation (including child-sensitive reporting mechanisms) if identified as salient risks for the project and verified during appraisal or monitoring, and - harassment or retaliation. - for projects with land acquisition a recourse mechanism is mandatory. A multiple-tier appeals process/recourse mechanism where complainants do not accept a project's proposed resolution may be required - projects with significant community concerns or significant displacement impacts should consider provision of mediation services or the use of independent arbitration. Such mediation generally would be triggered during the appeals process/recourse mechanism - additional monitoring and increased senior management oversight of monitoring.

The grievance mechanism needs to be rights compatible. The grievance mechanism will address concerns promptly and effectively, in a transparent manner that is culturally appropriate, rights compatible³, free from manipulation, interference, coercion, intimidation and retaliation, and readily accessible to all affected parties at no cost.

5. Step-by-step process

The following section provides a typical step-by-step process for a grievance mechanism. These are formed around typical steps (below) that any mechanism should include in order to meet the ESR 10 requirements and are reflective of good international practice.

Figure 2: Typical grievance mechanism (outline flow chart)



Clients must be aware of and respond to grievances in a timely manner. The timing of acknowledging receiving a grievance and responding with the proposed resolution should be contained within the grievance mechanism and reflected in the project Stakeholder Engagement Plan (SEP). Timing may vary depending on the project context. The following indicative time frames provide a guideline that projects may follow:

- written acknowledgement of receipt of grievance: within seven days of receiving a grievance
- proposed resolution: within 30 days of receiving the grievance.

The grievance mechanism must be responsive. Complaints should be reviewed as soon as they are received and prioritised for resolution. Regardless of general response and resolution time frames, some complaints may require immediate attention – for example, an urgent safety issue or where it concerns damage to a person’s property during a survey. There are some complaints that are simple and can be resolved quickly. Many complaints deal with rather minor

³ The GRM process and outcomes implemented by Clients shall respect human rights, avoid infringing the human rights of others and address adverse human rights risks and impacts caused by the business activities of its clients in accordance with the requirements of the Bank’s Environmental and Social Requirements (ESRs).

construction, disruption or nuisance issues or misunderstandings that can be addressed and fixed promptly. Grievance mechanisms should provide a framework to resolve such matters quickly, if at all possible and appropriate. These complaints should still be recorded and the resolution or action taken to resolve them recorded.

Anyone who has lodged a grievance should be afforded the opportunity to have someone accompany them in meetings and interviews held during the investigation of such a grievance. All reported grievances must be taken seriously and handled accordingly. Staff responsible for handling complaints should avoid subjective value judgements that may lead to the trivialising of complaints. They should be cautioned to not discount grievances.

Two main tiers are generally contained in a grievance mechanism: the first tier comprises an internal process aiming to reach a proposed resolution (steps 1 to 5) and then a second tier being available where complainants are not satisfied with the proposed resolution (step 6). A more detailed typical grievance management flowchart is provided below, followed by Table 2 which provides further guidance on how to conduct each step.

Figure 3. Typical grievance management flow chart

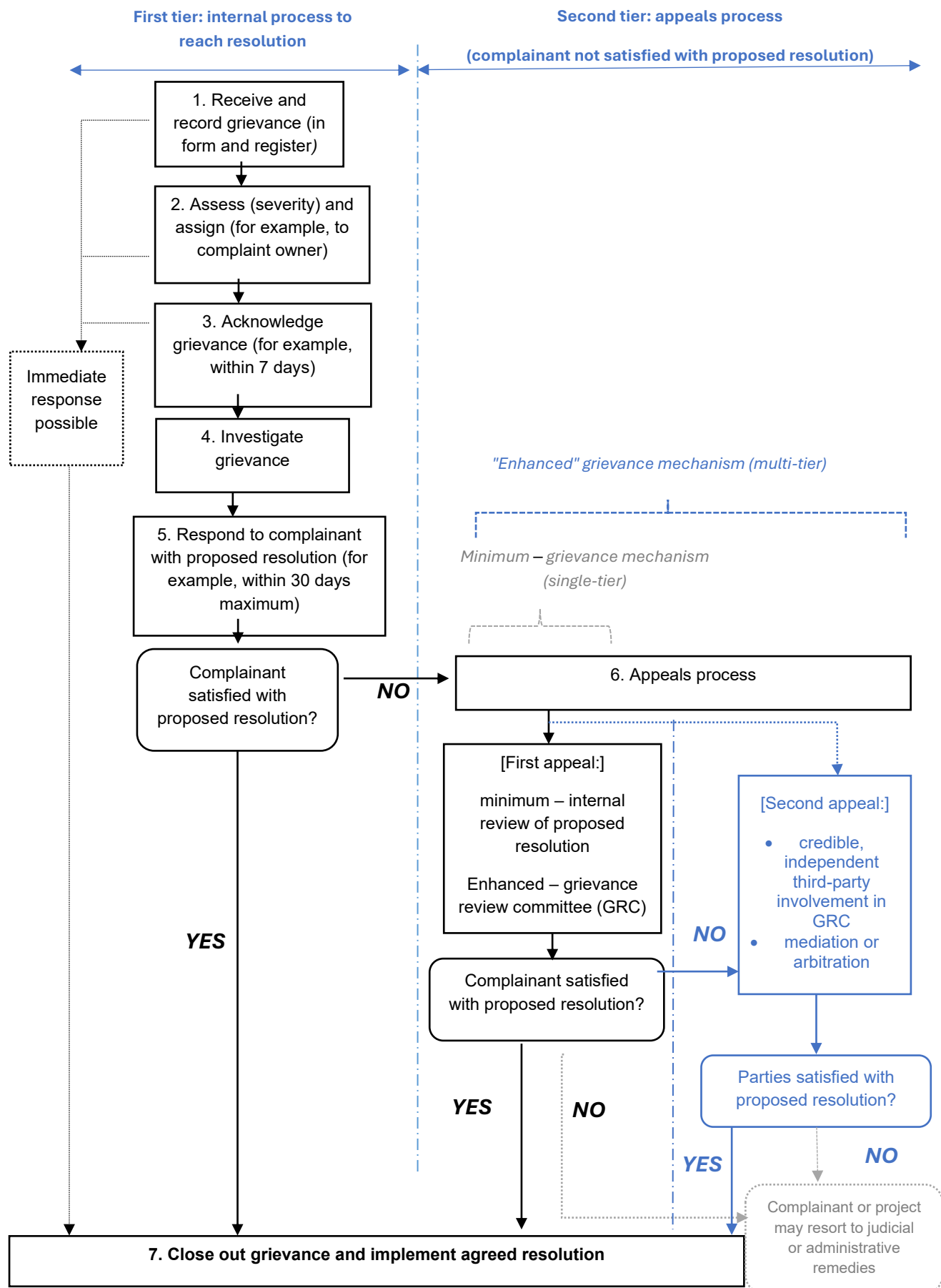


Table 2. Summary of steps in a typical grievance mechanism

1. Receive and record	2. Assess and assign
- multiple points of access should be available for grievances to be received by project - when a grievance is raised, whether verbally or in writing, complainants should be contacted by project (for example, CLO, grievance officer and so on) and a grievance registration form completed - resolve grievances requiring immediate action and simple low severity ones, where appropriate - escalate grievances of a critical nature - record grievance in a simple grievance register	- grievance officer (or function responsible) should: - categorize grievance: categorizing grievances helps with monitoring and assigning the relevant person to be the complaint owner - assess severity of level of grievance (escalate if considered critical) - assign complaint owner responsible for investigating and resolving complaint - update grievance register with complaint owner
3. Acknowledge	4. Investigate
- grievance officer (or function responsible) acknowledges receipt of grievance to complainant within time frame contained in mechanism, preferably in writing - verbal acknowledgement may occur in some project contexts, but this is not preferable - document acknowledgement in grievance register - complainant should be kept updated of progress and if the response is delayed	- investigation of grievance should seek to establish the validity of the grievance, verify claims made by complainant and seek evidence to substantiate them, and identify appropriate resolutions where required - investigation may require visiting location of grievance, engagement with other parties (including third parties), photographs and review of documents - during the investigation engagement may be required with the complainant - care must be taken to protect the identity of the complainant and their personal information - findings and proposed options for resolution should be documented.
5. Respond and agree actions for resolution	6. Appeal/recourse
- from the investigation proposed options for resolution should be identified. Engagement should be undertaken with the complainant to: - summarize the investigation and proposed resolution(s) options - allow a two-way conversation with the complainant. The aim is to seek an acceptable solution - in some cases, from the investigation the grievance may be deemed to be unfounded. In these cases, this should be communicated to the complainant, preferably in writing	A process should be available for complainants not satisfied with the proposed resolution. Mechanism depends on project context: - projects should consider a single-tier appeals process even where there is no significant E&S issues/risks - as a minimum a grievance mechanism should include what will happen should a complainant not be satisfied with the proposed resolution (for example, the resolution is reviewed by a different manager) - for a more enhanced grievance mechanism an internal grievance review committee would be an appropriate forum for appeals - some more complex projects may require a multi-step appeals process/recourse mechanism offering some degree of independence from the project. This may comprise the grievance review committee for a first appeal, this could be internal or may involve third parties, with a further

7. Close out and implement action	
- complainant accepts the proposed solution: - acceptance should be documented in either a simple letter or form (for example grievance acceptance and closure form) - implement resolution and agreed actions - update grievance register with closure status (for example resolved, unresolved (that is, appeals process available), abandoned (that is, complainant not contactable), unfounded).	opportunity for a second appeal to a process facilitated by an independent third party to help resolve disputes in an impartial manner. Projects where ESR 5 and ESR 7 are applicable require an independent appeal process - for projects with significant community concerns or displacement impacts provision of mediation and/or access to arbitration should be considered. Either party can resort to mediation or arbitration generally - the outcome of any appeal committee should be documented and shared with the complainant (for example, close-out letter).

6. Grievance mechanism documents and tools

The typical documents and tools that are used in the implementation and monitoring of a grievance mechanism are summarised below. The types of documents that should be developed vary depending on the requirements of a specific grievance mechanism. For all projects, a summary of the key aspects of the procedure should be disclosed along with the grievance registration form.

Table 3. Typical grievance documentation

Grievance procedure	- a simple document outlining the grievance mechanism; presenting the channels and process of how grievances are received and handled, as well as the appeals process/recourse mechanism; forms and template letters can be included in the appendices - provisions for confidentiality, protecting personal data, conflicts of interest, anonymous complaints and zero tolerance policy against any forms of retaliation should be included - process of regularly monitoring the implementation of the mechanism and analysing trends is described - the roles and responsibilities for the implementation of the grievance mechanism are outlined, including that of client, contractors and of specific staff assigned to grievance management; this document can assist in the training and sensitisation of the project/client team and contractors - example templates of grievance procedures are available online in good practice guidance, including the resources noted below
Grievance registration form	- A grievance registration form is used to record a grievance when received; this would either be completed by the complainant or with the support of a project representative; where a complainant is supported to complete the form, the contents should be read by or read to the complainant - the complainant should be requested to sign the form; however, this should not be mandatory, and it should be their own free will to do so; a copy of the form should be provided to the complainant - suggest the use of pre-printed carbon copy pads of the form so there are multiple copies of the same form (for example, three) can be useful in some contexts; if the form is completed digitally the option for signature may not be possible practically - the form should give the complainant the option for: - the grievance to be anonymous

	○ for their identify to not be disclosed without their consent (sometimes referred to as a confidential grievance) ● a sample grievance registration form is provided in Annex 2
Grievance acknowledgement letter	● a template acknowledgement letter can be prepared, which is then issued to complainants to acknowledge their grievance has been received ● this should be issued within the time frame contained in the grievance mechanism; the letter should contain the details of the contact person, a brief outline of the grievance mechanism and what the complainant should expect, including the time frame for response ● example templates of grievance acknowledgement letters are available online in good practice guidance, including the resources noted below
Grievance acceptance and closure form or letter	● a simple letter or template form can be used to record the resolution offered and accepted by the complainant, as well as confirm the action taken
Grievance register	● grievances should be registered and logged regardless of whether they are received in writing or verbally; good practice is to log all grievances, even recurrent ones, those resolved immediately and grievances that are eventually deemed to be unfounded or unreasonable ● a spreadsheet or database is often used to register, manage and monitor grievances; this is referred to as a grievance register; a sample grievance register is provided in Annex 3 ● a grievance register should keep track of: ○ name and contact details of complainant (if appropriate); with confidential grievances, assign grievance case numbers to these grievances; the grievance register may then include a case number but not the name or other details of the complainant ○ date and description of grievance ○ category of grievance (for example, employment, environment, nuisance, land acquisition/compensation, health and safety, social, cultural heritage, harassment, stakeholder engagement) ○ project activities or location the grievance applies to and team/department/contractor responsible for activity or management of the operations in this location ○ the person charged with addressing the complaint, often referred to as the complaint owner ○ proposed resolution (including any options for resolution that could be discussed with the complainant) ○ how and when information and responses were communicated to the complainant ○ whether the complainant is satisfied or not with the proposed resolution, process and outcome ○ date grievance closed.

Documents that are provided to complainants should be in relevant written languages that they understand. This may mean translations are required of a few key documents into additional languages (for example, the form and letters to complainants).

There are resources available online to provide additional guidance on setting up a grievance mechanism and these include tools and templates for typical documents (for example, grievance procedure template, grievance register).

Such resources include:

- World Bank Compliance Advisor Ombudsman Community Grievance Mechanism Tool Kit (<https://www.cao-ombudsman.org/grm/index.html>)

- International Petroleum Industry Environmental Conservation Association (IPIECA) Community Grievance Mechanisms Toolbox (<https://www.ipieca.org/resources/good-practice/community-grievance-mechanisms-in-the-oil-and-gas-industry/>)

7. Anonymous grievances

A grievance mechanism must allow for anonymous grievances to be raised and addressed (where permitted by law) and information on the grievance mechanism should communicate that anonymous grievances can be raised and how. An "*anonymous grievance*" where the complainant is unknown to the project, is different to a "*confidential grievance*" where a complainant does not want their identity disclosed without their consent. It is paramount that those who wish to register a grievance can remain anonymous if they so prefer and Complainants should feel free to give as little personal information as they wish.

Enabling anonymous complaints to be received in itself can be challenging and can depend on the project context. The channels to raise an anonymous grievance must be culturally appropriate and free to use. Section 5, Channels to raise grievances, below presents channels used for grievances and identifies which channels can be suitable for raising anonymous grievances.

There are practical limitations regarding response to anonymous grievances and achieving full resolution, which should be noted when the grievance mechanism is publicised by the client. It is important while allowing anonymous grievances to be raised that a project communicates that confidential grievances can be submitted and how they will be handled to protect a complainant's identity.

For anonymous grievances the process should follow that set out in the grievance mechanism. It will not however be possible to acknowledge an anonymous grievance, contact the complainant to request further information to support investigation of the complaint or discuss proposed resolutions unless the option of a proxy or third party allows for this and the complainant agrees. The investigation should still identify proposed resolutions where appropriate and any corrective actions implemented.

8. Escalation of critical complaints/grievances

If a grievance is assessed as being of a critical nature this should be escalated as soon as possible to the grievance officer/function and senior management (responsible for the grievance process and those who may be responsible for managing such matters in a project/company for example health, safety and environment or security). If the grievance involves an allegation related to a person involved in implementing the grievance mechanism, then identifying the appropriate person to escalate it to may need to be considered carefully.

It is not possible to define critical grievances for all project scenarios. Grievances of a critical nature are those generally which may require special protection measures for the complainant (or persons alleged to be involved or witness to an incident). They may relate to harassment, threats, physical violence, disrespectful behaviours, security incidents, gender-based violence and harassment (GBVH), retaliation, issues arising from accidents or potential for community tension or conflict arising out of a situation. Investigations should be led by a relevant senior manager.

For certain complaints, such as those relating to gender-based violence, child sexual abuse and exploitation (including child-sensitive reporting mechanisms), and harassment or retaliation, special protection measures might be required. As a first step, clients should consider whether it is necessary to establish separate procedures or a standalone grievance mechanism to manage these types of complaints or whether existing grievance channels can be adapted to facilitate safe reporting. When developing such a mechanism, the client should consult with a diverse group of stakeholders, including women and people of diverse sexual orientation and gender identities, and look to resolve potential barriers that these groups face in accessing grievance mechanisms.

As a rule of thumb and following the principle of GBVH case handling⁴, the process needs to be managed in a non-judgemental, sensitive manner by professionals, specially trained and licensed/authorised experts where such risk is relevant for the project. This could mean that third-party services will be required, including appropriate referral pathways, for example with local service providers, should the complainant require medical, psycho-social or legal support services. Also, when it comes to minors, the focus of engagement and consent needs to stay with their legal guardians, such as parents who are in a position to decide what is best for their children in terms of the process and outcomes.

Given the sensitive nature of such complaints, measures should be in place to provide protection to the identity of the complainant and any witnesses. Conflicts of interest should be considered in the decision on who should investigate and handle such grievances (for example, claims of harassment should not involve any party alleged to have been party or witness to such harassment). Documentation related to such a grievance should be kept confidential with restricted distribution and access.

9. Vulnerable groups and individuals

A grievance mechanism should be accessible and effective for all affected stakeholders. Grievance mechanisms should be developed considering the needs and barriers faced by vulnerable groups and individuals in interacting with the project and raising grievances. For example, language, remoteness and cultural sensitivities can contribute to these individuals and groups experiencing challenges to access a grievance mechanism and trusting in such a mechanism.

Key elements of a good grievance mechanism discussed in this guidance (summarised below) can provide a framework to encourage vulnerable groups and individuals to raise grievances and for them to be handled appropriately. With some additional consideration these elements can be further augmented to address where relevant the needs and barriers faced by these individuals and groups.

Key elements of a good grievance mechanism

- consideration of project context, affected community context (including vulnerable groups and individuals) and risks in designing the grievance mechanism
- language
 - grievance mechanism should be publicised and disclosed in a format and language(s) that is/are readily understandable to the affected stakeholders

⁴ Further guidance on specific considerations for grievance mechanisms from a GBVH perspective is provided in [Addressing Gender-Based Violence and Harassment](#).

- engagement and verbal disclosure of information on the grievance mechanism should be in relevant languages; the project representatives receiving and handling grievances should speak relevant languages or have translators available; additional provision could be made where some groups may wish to have their own translators who they select, to build trust it can be important to accommodate such requests.
- customary dispute settlement processes and forums should be considered in development of the grievance mechanism; this may be useful to inform proposed resolutions or to contribute to the appeals process
- multiple methods to publicise the grievance mechanism and multiple channels to receive grievances
 - should consider the needs of vulnerable groups; the existing forums and methods of engagement within and used by vulnerable groups should be considered; for example, women's meetings, farmers groups, local radio, village/community noticeboards, use of social media
 - places where vulnerable groups meet and interact could be a consideration when deciding where to place complaint boxes, if used
 - the use of third parties to raise grievances on behalf of complainants or receive grievances from them and communicate these to the project
 - documents to publicise and be used in the grievance mechanism should be simple, understandable and distributed throughout the project area, including places where vulnerable groups meet and interact
- provisions for confidential grievances to be raised and the identity of the complainant to be protected; communicating this provision to vulnerable groups is important, including how a complainant's identity will be protected and that the grievance will be handled in confidence
- provisions for anonymous grievances can encourage some vulnerable groups and individuals to feel able to raise grievances
- reinforcing the policy of non-retaliation and that measures are contained in the grievance mechanism to avoid retaliation against complainants.

10. Gender considerations

Reference: ESR 10, paragraph 36.

A stakeholder's gender and sexual orientation, including those from gender and sexual minorities, may mean a project affects them differently and they may have a different response and concerns about project impacts. Access to project benefits or the opportunities a project can offer, such as employment, can also differ by gender. This can also result in different types of grievances, preferences for communicating grievances differently or only feeling comfortable raising them through certain channels.

In addition to the measures described for critical complaints above, when designing a grievance mechanism some additional consideration for gender and sexual orientation can be valuable regarding:

- methods used to inform stakeholders about the grievance mechanism: have female and male staff available to verbally provide information on the mechanism
- channels to receive and the process to handle grievances: in situations where a person might feel uncomfortable raising a grievance with a person of a different gender then the option to hold discussions with someone of the same gender should be offered where possible, both at the time of registering the grievance, as well as during the following grievance process

- if a review forum/meeting or a GRC for appeals is established it should include women representatives in addition to men
- confidential grievances, protection of the identity of complainants and provision for anonymous grievances:
 - having channels available where everyone feels safe to report grievances and they can be raised in confidence (and there is the option for anonymity) are important contributing factors to a grievance mechanism being responsive to all affected stakeholders

11. Government-led projects

Reference: ESR 10, paragraph 19.

In addition to resorting to the judicial system, many governments in the EBRD regions have their own grievance procedures for challenging an administrative decision. Often this is based on specific ombudsman services. Experience demonstrates, however, that the efficiency of these systems may not meet the Bank's expectations and requirements for a timely resolution of grievances. In such cases, the Bank requires that a project-specific grievance mechanism be established, unless adequate evidence can be provided by the relevant government that existing mechanisms provide effective and timely grievance resolutions.

In a typical government-led project, it is practical to rely on different levels of local government (for example municipality/district) to establish a two-tiered appeal system.

12. Benchmarking against good international practice

Reference: ESR 10, paragraph 35.

Principle 31 of The United Nations Guiding Principles on Business and Human Rights promotes the use of grievance mechanisms and provides eight effectiveness criteria for grievance mechanisms. ESR 10 and this associated guidance on grievance mechanisms has been developed to be aligned with such effectiveness criteria.

These principles can be used to benchmark project grievance mechanisms against, while recognising project context and legal requirements can result in differences. How a client implements their grievance mechanism will also determine whether the outcomes are consistent with these criteria.

The IPIECA manual⁵ contains a simple tool (tool 1) for such a benchmarking exercise. For Category A projects, larger and more complex projects, projects with significant E&S impacts or with significant community concerns undertaking the benchmarking exercise can be beneficial. It may help identify areas of improvement for a grievance mechanism.

⁵ Available at: <https://www.ipieca.org/resources/good-practice/community-grievance-mechanisms-in-the-oil-and-gas-industry/>.

13. Publicising and providing access to the grievance mechanism

Reference: ESR 10, paragraphs 22 and 36.

✓ *Publicising the grievance mechanism*

A grievance mechanism should be publicised and disclosed in a format and language(s) that is readily understandable to the affected communities and stakeholders. Both written forms of communication and documents, as well as verbal and interactive methods of communication should be used to publicise the grievance mechanism.

Table 4. Communicating the grievance mechanism

Methods to inform stakeholders about a grievance mechanism	Printed documents • leaflets, brochures, posters, FAQs: should explain key parts of process, ways to raise a grievance and contact details • using comic style or pictures to help visualise the process of raising a complaint and what will happen • key project documents should contain information on the grievance mechanism, including the SEP, Non-Technical Summary (NTS), ESIA, Resettlement Plan (RP) • documents should be translated into relevant languages; they should be simple, understandable and distributed throughout the project area
	Face-to-face, in-person • CLOs, project grievance officers and other project representatives undertaking stakeholder engagement • community meetings, survey programmes, fieldwork and other engagement forums should be used as opportunities to provide information verbally and in written format
	Traditional media • TV and radio can be good mechanisms to inform stakeholders about the grievance mechanism; local TV and radio, especially with linear projects, can be a good vehicle to consider • some clients may consider developing short videos on the grievance mechanism in a few languages; these can then be used on traditional media as well as social media platforms; they can also be used to build awareness of the project team and contractors, as well as by the project representatives to communicate on the grievance mechanism
	Digital and social media platforms • project websites can publish the grievance mechanism and provide a channel to raise grievances • social media platforms, such as Facebook, X, YouTube can be used to make people aware of the grievance mechanism • projects and/or companies sometimes set up project social media pages; this can be a portal to provide information on the grievance mechanism, as well as provide contact information to ask a question and submit a grievance; privacy and data protection should always be carefully considered when using such platforms.

The locations where documents on the grievance mechanism are left should include venues and meetings where the affected community and stakeholders gather and interact (for example, community halls and meetings, market days). Such venues and meetings can also be useful for project representatives to attend, if appropriate, to be available to raise awareness and provide information on the grievance mechanism.

Box 2. Key messages to communicate externally on the grievance mechanism:

- how to report a grievance
- the grievance will be registered and acknowledged by the project; some grievances may be resolved quickly, if not then it will be investigated
- the time periods for acknowledgement of a grievance and the proposed resolution will be provided to the complainant
- proposed resolution will be implemented if agreed; if a complainant is not satisfied with the proposed resolution offered then they can appeal
- how they can appeal
- reporting a grievance is free of charge
- use of the grievance mechanism does not stop a person from seeking other legal or administrative remedies
- grievances can be made anonymously and how to do this
- personal information will only be shared if a complainant agrees and will be treated confidentially
- grievances will be handled discreetly and carefully to protect complainants from retaliation; the project will not tolerate actions of retaliation and will investigate any allegations of retaliation.

✓ **Channels to raise grievances**

Multiple channels should be available for stakeholders to raise grievances. The numbers and type of channels used will depend on the project context and risks. They should always ensure that grievances can be received in the relevant local languages.

In identifying the channels to be made available the potential barriers for affected communities and stakeholders to make complaints should be considered. This should include consideration of barriers that vulnerable groups may face.

Examples of barriers include: literacy and language issues, limited access and use of communication and digital tools (such as mobile phone, internet and email), fear of reprisals, or legacy issues contributing to a lack of trust. Channels used should be culturally appropriate and gender responsive (for example, allowing women to raise complaints with a female project representative).

The grievance mechanism might also require dedicated reporting channels for critical complaints, as described above.

With the exception of confidentiality being requested or an anonymous grievance being made, in practice grievances are often raised in person and face-to-face with a project representative. In certain instances, some stakeholders may express their concerns in a public forum, some might do this to attract media attention. More traditional face-to-face channels should be available, as well as more remote channels, such as phone, email, text messaging, letters and complaint boxes. Those working with linear and physically remote projects will specifically find it beneficial to make such remote channels available.

Channels to raise grievances	
• In person	○ Grievances can be lodged with CLOs, grievance officers or other project representatives and contractor CLOs/representatives. In situations where a person might feel uncomfortable discussing a grievance with a person of a different gender then the option to hold discussions

with someone of the same gender should be offered where possible, both at the time of registering the grievance, as well as during the following grievance process. ○ Grievances can be raised at project offices (for example, main and construction) and any project community offices. Where specific security arrangements prevent easy access of community members and stakeholders to a project office, the project may need to open dedicated community offices or alternative offices that are more accessible. ○ Local authority offices, such as municipalities or district administration, can be considered for some projects as a possible venue for grievances being raised. This can be relevant, for example, for linear infrastructure projects where the state or government authority is the EBRD client or involved in the project.
• Toll-free grievance hotline/dedicated telephone number, email, text messaging, postal or web-based online filing of grievances ○ These can be useful but in some contexts are not sufficient, especially in rural, remote and poorer communities. It is important therefore to have multiple access points for receiving grievances. ○ Channels such as telephone hotlines and web-based filing of grievances can be managed appropriately to receive anonymous grievances. For example, where grievances are received verbally, the person can be asked first whether they would like to do this anonymously with no personal details taken. ○ Letters and web-based forms can be used as a channel to submit grievances anonymously.
• Complaint boxes in public areas. Can also provide a channel for raising anonymous grievances.
• Third parties ○ In certain project contexts, for projects with significant displacement impacts, significant legacy issues that may have affected trust or significant community concerns, the use of the services of an independent third party should be considered (for example, local community representative, legal firm, advocates or NGO) who may be available to receive grievances and submit them. ○ A third party or a proxy can support receiving anonymous complaints and in some instances proposed resolutions can be communicated with the complainant if they so choose. ○ Making a third party a method with which to raise grievances for vulnerable groups may be appropriate and considered necessary in certain contexts. ○ The use of a third party may also be appropriate in some contexts where the EBRD client is a state or government authority. In some countries and for some sectors there may be an ombudsman's office for non-judicial complaints. They can be a specific channel where state or other public authorities are involved in a project. This may offer an additional channel for projects to consider receiving complaints, including anonymous ones.

14. Roles and responsibilities

Reference: ESR 10, paragraph 13.

✓ **Organisation and resources**

Clients should allocate responsibility for dealing with grievances; generally, this is allocated to the function within the organisation that is also in charge of community liaison. It may vary depending on the project scale and organisational structure however:

- For smaller and less complex projects, such as Category C and some Category B projects, they may not have dedicated resources to implement the grievance mechanism, and this may have to be shared across other functions. Sometimes a point of contact may be provided within the public relations or communications department to raise grievances with or manage the registration of grievances. Once the grievance has been received and acknowledged, one or several trained staff in technical functions (for example environmental, health and safety, procurement, construction lead, engineering lead), whose

role are likely to relate to grievances, should be allocated responsibility as the complaint owner, depending on the type and scope of the grievance. Some Category B projects may be of a scale where a community liaison function is established with some CLOs and maybe a grievance officer.

- For Category A projects, large, new or major expansion projects, projects involving large-scale land acquisition and projects with significant community concerns or complex issues it would be expected that a community liaison function is embedded within the organisational structure and there are dedicated resources to implement the grievance mechanism, such as a grievance officer and CLOs. The number of resources would depend on the project scale and context. For linear projects having CLOs available along the route is sometimes necessary. CLOs also have an important engagement function.
- The grievance mechanism might need to engage third party assistance as described for critical complaints above.
- With increasing access to digital technology and video recording devices (such as smart phones) incidents involving actual or perceived risk or damage to, for example, areas of natural habitat and biodiversity value can be posted (for example, on social media) and distributed quickly. This can give rise to escalation of issues, misunderstandings, increased complaints and result in reputational risk. The stakeholder engagement system and grievance mechanism may require access to technical experts to support pro-active engagement and provide support if such grievances are raised.

The types of grievance may vary during the project cycle. The allocation of resources to implement a grievance mechanism should consider the project cycle and when grievances are likely to peak. In practice grievances can be anticipated to peak at a number of points in a project cycle. Some examples follow:

- **Pre-construction:** during asset surveys, valuation processes, disclosure of compensation entitlements and payment of compensation complaints can peak. During increased site activity for baseline surveys, intrusive surveys can specifically increase complaints (for example geotechnical investigations where trial pits or other such intrusive techniques are used). Hiring of a local workforce can trigger complaints, including regarding how local and national content requirements are being considered.
- **Construction:** this is generally the stage of the project cycle where there is the largest change and impact on the community. Peaks of grievances can be expected related to construction impacts (for example noise, disturbance, dust, traffic) and labour-related issues. Presence of contractors and subcontractors, and their workforce, in the community can give rise to complaints and there is the need for arrangements to be in place to handle grievances on multiple fronts. Coordination between contractors and the project/company should be a key focus.
- **During operations** for some projects the impacts on affected communities may decrease, depending on the sector, however for some sectors particularly those which provide services, a large number of complaints could be expected during operation.
- **Delays to a project schedule** can result in an increase in grievances for some projects. A few specific delay-related scenarios that commonly give rise to an increase in complaints include:
 - delay to payment of compensation for land and relocation of affected community

- employment opportunities being delayed and expectations related to benefits from the project.

Grievance review committees (GRCs) (see Section 4, Figure 3) can enhance a grievance mechanism and can have the following roles:

- reviewing escalated grievances and appeals from complainants who are not satisfied
- authorising additional actions/alternative proposed resolutions in order to provide another avenue for achieving acceptable resolutions
- approving the close out of grievances where it is not reasonably possible to reach an agreed resolution with a complainant
- looking at trends in grievances received, identification of corrective actions for the mechanism and supporting their implementation.

GRCs can be drawn from different functions within the project organisation, including from contractors. Such committees can include external stakeholders (for example, community leaders, local community representatives) and external, independent third parties (for example, law firms, advocates or NGOs). The involvement of external stakeholders can be especially valuable where there is significant community concern about a project's activities. The scope of work of the GRC needs to be developed by management and roles and responsibilities agreed with all committee members.

✓ **Management role and responsibility**

Senior management oversight and involvement in the grievance mechanism is required for a number of reasons:

- Some key issues that escalate externally and result in complaints of a critical nature are related to matters stakeholders have raised earlier in the project cycle or have raised repeatedly. These sometimes have not either been fed through to the project decision-making avenues, were discounted or were not escalated to management. This may happen because staff are concerned about raising issues to management or there is no process set out for escalation, or there is no senior management oversight of the grievance mechanism.
- Grievance procedures that include GRCs or periodic grievance meetings, or, for smaller projects a senior manager reviews the grievance mechanism and monitoring can result in improvements and earlier responses to issues to prevent them from escalating.
- Resolutions for some grievances can need senior management authority to approve and implement (for example, they can have a significant cost associated with them or the action could result in a schedule impact).

Within the grievance mechanism the role of senior management and the process to escalate critical or repeated complaints should be clearly distinguished. A senior manager should be assigned responsibility for oversight of the implementation of the grievance mechanism. Generally, a senior manager should be involved in the GRC, who, as well as being in place to hear reviews, should have a role in periodically monitoring the grievance mechanism.

✓ **Contractor responsibility for grievance management**

Contractors' role and responsibilities for receiving grievances, supporting the investigation and resolution of grievances and abiding by the project grievance mechanism should be clearly set out in the grievance procedure and stipulated in the contractor's contract (and other working documents). An important element of this can be how the contractor's community liaison function coordinates with the client community liaison function.

All grievances received by contractors should be logged, shared with the project and registered. There may be certain grievances that contractors can immediately and quickly resolve (for example, gates being left open during the works and livestock escaping or entering the construction area). The contractor however should still log these and provide the necessary information to the client. Privacy and confidentiality should be maintained in all aspects of the Contractor's activities as outlined in Section 4.

Affected communities and stakeholders do not generally differentiate between project activities undertaken by a client team or those undertaken by the contractors. Therefore, it is important that contractors are trained in handling grievances, concerns, requests, and so on in compliance with the project grievance mechanism. Relevant clauses should be contained within the appropriate contract with contractors (and other relevant parties, such as supervising engineers) regarding their roles in supporting the client with the grievance mechanism. Their contracts should mandate that they will abide by the project grievance mechanism, this includes the requirements for confidentiality, data protection, management of personal data, conflicts of interest and avoidance of retaliation. Contractors should provide plans or documents outlining how they will build awareness and train staff (and subcontractors) on the grievance mechanism and within this how contractor staff (such as contractor CLOs) will refer grievances received to the client.

The client may receive complaints about the activities being undertaken by contractors (and their subcontractors). If the client needs to lead the investigation, when assigning the complaint owner consideration should be given to whether the person is senior enough and they should be afforded the full support of the person who is managing this contractor. Where repeated complaints in a location or on a specific matter are made about a contractor (or their subcontractors) this should be escalated and corrective action be a matter of discussion with the senior management of the contractor.

15. Monitoring and reporting

Reference: ESR 10, paragraphs 36 and 37.

Monitoring should be undertaken on an agreed periodic basis; for most projects this should be monthly. Periodic monitoring of agreed indicators (examples below) should be undertaken and a short report prepared (such as a set of short slides):

- number and type of grievances during the reporting period
 - opened
 - investigation ongoing
 - resolved
 - unresolved (*complainant not satisfied with resolution – grievances referred to appeals process*)
 - closed:
 - *complainant satisfied with resolution*
 - *complainant not satisfied with outcome of appeal/abandoned (that is complainant not contactable)/unfounded*
- analysis of time required to acknowledge and propose resolution to complainant against the time frames set in the grievance mechanism
- categories of grievances (as relevant to the project and contained in grievance register)

- anonymous grievances (number, type, location (if available)); trends in these should be monitored. If there is an increase in the numbers of anonymous grievance it should be reviewed whether there are external concerns about grievances being handled in confidence
- trends (for example, number or category of grievances, repeating typology, location or from the same contractor, compared with previous reporting period)
- keeping a profile of those who lodge a grievance could prove useful in terms of knowing who and where the most affected are; personally identifiable information, however, should be redacted from such profiles; aggregated data such as gender, age and location could be gathered.

These periodic monitoring reports should highlight any grievances of a critical nature that have been escalated and should be reviewed by the senior manager responsible for oversight of the grievance mechanism and shared with relevant heads of department. Monitoring reports need to protect the privacy of complainants, and any confidential information should not be included.

The senior manager responsible for oversight of the grievance management function should also undertake a quarterly or bi-annual review of the monitoring programme. The purpose of this review could be to:

- analyse trends to identify underlying systematic issues and generate lessons learned
- review grievances of a critical nature which have been escalated during the period to identify any lessons learned or corrective action to reduce risks in the future
- review grievances which have been submitted for appeal (such as to the GRC) to identify any themes as to why resolutions were not accepted by complainants and whether the appeals process is functioning effectively and identify possible areas for improvement/discussion.

Where contractors are part of the grievance mechanism, the senior manager review should encompass the review of any specific trends in complaints with regard to contractor activities, workforce behaviour and their support for the implementation of the grievance mechanism. Feedback, lessons learned and any required corrective action for contractors can be a valuable output of such a review.

In order to improve the mechanism, it can be useful for periodic monitoring reports and senior manager reviews to be shared and discussed with the GRC, where applicable.

Annex 1. Grievance management definitions

Grievance mechanism	Non-judicial process managed by a project/client for receiving, acknowledging, investigating and responding to grievances or complaints. Should include what will happen if a complainant is not satisfied with the proposed resolution. Does not affect a complainant's access at any point to judicial or administrative remedies. May be referred to as a project grievance mechanism or a community grievance mechanism (CGM). Usually separate from an employee/worker grievance mechanism (as required under the EBRD's ESR 2)
Grievances or complaints	- a grievance or complaint is an expression of dissatisfaction with the project activities (actual or perceived), typically referring to allegations of a specific incident or impact potentially arising from the project, though also including concerns that stakeholders have and feel would be best handled through the project grievance mechanism (therefore defining them as a grievance). - complainant may be seeking a specific solution - project activities include project company actions as well as contractor and subcontractor actions - the terms "grievance" and "complaint" can be used interchangeably, without presuming differences in scale, complexity or seriousness Example: - alleged that a contractor is using as a haulage route a road that runs past a local village school, resulting in road safety risks, noise and dust impacts. The project ESIA and Environmental and Social Management Plan (ESMP) state this road was not to be used for construction access. Complainants seek the solution that the project cease use of this road for construction access and make good any damage caused
Concerns and issues	- concerns and issues are questions, requests for information, or general perceptions regarding the project activities, that may or may not be related to a specific incident or impact. Systematic and meaningful stakeholder engagement should enable such concerns and issues to be fed into and responded to by the project - concerns may become complaints if not addressed satisfactorily Examples: <i>local community request to be given preference for employment opportunities during construction</i> <i>farmers express worries that during the planned project land and valuation surveys their livestock will escape onto the road and be killed</i>
Complainant	person or group of people/organisation who have a grievance against the project or its contractors and subcontractors, and who submit a grievance
Appeals process/recourse mechanism	- the process for appeal or recourse where a complainant is not satisfied with the proposed resolution from the project - the terms "appeals process" and "recourse mechanism" can be used interchangeably
Mediation	the facilitation by an independent mediator of both parties' efforts to reach an acceptable solution
Arbitration	occurs whereby both parties agree to be bound by the decision of an independent arbiter

Annex 2. Grievance registration form (example)

Reference no. _____	
Full name	First name _____ Last name _____
Note: you can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent	☐ I wish to raise my grievance anonymously ☐ I request not to disclose my identity without my consent
Contact information Please mark how you wish to be contacted (mail, telephone, email)	☐ By post: please provide mailing address: _____ _____ _____ ☐ By telephone: _____ ☐ By email: _____
Preferred language for communication	☐ [Insert relevant languages] [Insert relevant languages] ☐ Other language or preferred, please state: _____ ☐
Description of incident or grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of incident/grievance	
	☐ One time incident/grievance (date _____) ☐ Happened more than once (how many times? _____) ☐ Ongoing (currently experiencing problem)
What would you like to see happen to resolve the problem? 	
Signature of complainant: _____ Date: _____	
Grievance received by: If received by project/company representative/ other party, please complete	Name of person receiving grievance: _____ Position of person receiving grievance: _____ Signature: _____ Date: _____
Please return this form to: [name], [position for example, grievance officer], [company name], Address _____: Tel.: _____ or Email: _____@_____.com	
COPIES:	
☐	Complainant
☐	Recipient/grievance officer
☐	File record copy

Annex 3. Grievance register (example)

Number	Grievance case no.	Date received	Received by	Channel/methods received by	Name of complainant	Location/community	Brief description of grievance (if critical nature highlight)	Category	Date acknowledged	Responsible department or contractor	Complaint owner	Proposed resolution/feedback to complainant	Date of proposed resolution/response communicated to complainant	Complainant satisfied with proposed resolution/response (yes/no)?	If no, summarise why and if complainant taking to appeal	Satisfied with outcome of appeal (yes/no)?	If no, why not?	Date closed
1																		
2																		
3																		
4																		
5																		
6																		
7																		
8																		
9																		
10																		