

## **Grievance Review Guidelines**

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**Contents**

- 1 Definitions ..... 3
- 2 Background..... 3
  - 2.1 Purpose ..... 3
  - 2.2 Scope..... 3
- 3 Grievance Review Mechanism Structure ..... 4
- 4 Ensuring Awareness of the Mechanism ..... 4
- 5 Grievance Review Process..... 5
  - 5.1 Communicating Grievances ..... 5
  - 5.2 Registering the Grievances ..... 5
  - 5.3 Screening Grievances for Eligibility..... 6
  - 5.4 Processing Eligible Grievances ..... 7
  - 5.5 Feedback ..... 8
  - 5.6 Conclusion of the Grievance Review..... 9
- 6 Reporting and Lessons Learned ..... 9
- Annex I: Grievance Review Mechanism Process Flow..... 10
- Annex II: Grievance Submission Form ..... 11

This note is building on FAO’s guidelines at the corporate level including the Environmental and Social Management Guidelines<sup>1</sup>, Compliance Reviews Following Complaints Related to the Organization’s Environmental and Social Standards Guideline,<sup>2</sup> as well as FAO’s Guidance Note on Accountability to Affected Populations (specifically commitment 3 on “Feedback and Complaints”).<sup>3</sup>

## 1 Definitions

1. Grievances: any concerns raised by beneficiaries to FAO GEORGIA through designated channels regarding FAO’s programming in each phase of the project cycle as set out in FAO’s Accountability to Affected Populations (AAP) commitment 3<sup>4</sup>, as well as alleged and or potential violations of FAO’s Environmental and Social Standards (ESS);
2. Complainant: a party, person or entity raising a concern/submitting a grievance to FAO GEORGIA;
3. FAO programme: any technical or emergency assistance project activity carried out in Georgia either directly by the Organization or by an implementing partner on FAO’s behalf or as part of a joint project with FAO;

## 2 Background

### 2.1 Purpose

4. FAO is committed to ensuring that its programmes are implemented in accordance with the Organization’s ESS<sup>5</sup> as well as AAP commitments<sup>6</sup>. FAO GEORGIA office has established this Grievance Review Mechanism (GRM) to provide beneficiaries of FAO programmes with a transparent, effective and timely mechanism to provide feedback and voice their concerns, a means to have them resolved and to keep them informed of what is being done to address their concerns throughout the grievance review. The GRM set out the procedure for receiving and processing these grievances and concerns in order to formulate recommendations for their resolution.

### 2.2 Scope

5. The GRM guidelines apply to the local office for reviewing grievances and concerns related to FAO’s ESS and AAP commitments, raised by beneficiaries of FAO programmes and other

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<sup>1</sup> FAO 2015. “Environmental and Social Management Guidelines” <http://www.fao.org/3/a-i4413e.pdf>

<sup>2</sup> FAO 2015. “Compliance Reviews Following Complaints Related to the Organization’s Environmental and Social Standards” <http://www.fao.org/aud/42564-03173af392b352dc16b6cec72fa7ab27f.pdf>

<sup>3</sup> FAO. (n.d.).FAO in Emergencies, Guidance Note “Accountability to Affected Populations” [http://www.fao.org/fileadmin/user\\_upload/emergencies/docs/Guidance%20Note\\_Accountability\\_Publi.pdf](http://www.fao.org/fileadmin/user_upload/emergencies/docs/Guidance%20Note_Accountability_Publi.pdf)

<sup>4</sup> For more information please refer to FAO’s Guidance Note on Accountability to Affected Populations (AAP): [http://www.fao.org/fileadmin/user\\_upload/emergencies/docs/Guidance%20Note\\_Accountability\\_Publi.pdf](http://www.fao.org/fileadmin/user_upload/emergencies/docs/Guidance%20Note_Accountability_Publi.pdf)

<sup>5</sup> See <http://www.fao.org/environmental-social-standards/en/>

<sup>6</sup> See [http://www.fao.org/fileadmin/user\\_upload/emergencies/docs/Guidance%20Note\\_Accountability\\_Publi.pdf](http://www.fao.org/fileadmin/user_upload/emergencies/docs/Guidance%20Note_Accountability_Publi.pdf)

related stakeholders in Georgia, in order to define actions for their resolution at the programme and project management level when relevant.

6. Allegations of fraud, corruption or other types of misconduct by FAO personnel or by third parties<sup>7</sup> should be made directly to the FAO Office of the Inspector General (OIG) for investigation. If at any stage of the grievance review process set out in these guidelines, a grievance received creates a reasonable suspicion or indication of fraudulent, corrupt, coercive or collusive practices or improper use of the Organization's resources, it must be immediately reported to OIG according to FAO's rules and regulations<sup>8</sup>.

### 3 Grievance Review Mechanism Structure

7. A full map of the GRM highlighting responsibilities and procedural flow is clarified in Annex I. The main composition of the GRM structure is as follows:
  - i. Grievance Review Officer (GRO): a staff member designated as the focal point to receive and process grievances and concerns. This staff member receives, registers and files grievances, performs initial screening of eligibility and suggests follow-up action and the composition of the Grievance Review Committee to the FAO Representative for Georgia (FAOR). The GRO is responsible for monitoring the complaint handling process from beginning to end, ensuring compliance with these guidelines.
  - ii. Grievance Review Committee (GRC): the Committee that oversees the grievance review process, suggests the verification methodology and assigns the Grievance Verification Officer/s (GVO), as well as endorses the review report including the suggested recommendations/course of action. The GRC is comprised of at least two FAO Georgia personnel in addition to the GRO. The inclusion of a third party personnel (Government, local NGOs, INGOs, etc.) can be considered if necessary to address the grievance under review.
  - iii. Grievance Verification Officer (GVO): the officer assigned to conduct the verification following the methodology endorsed by the GRC.

### 4 Ensuring Awareness of the Mechanism

8. All FAO programmes and projects are required to publicize the GRM at the local level. To ensure that stakeholders are aware of the GRM, the following measures will be put in place during project implementation:
  - i. Beneficiaries will be informed of the mechanism by project staff as well as implementing partners and service providers engaged by FAO during beneficiary selection, distribution processes and in conjunction with post-distribution monitoring.

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<sup>7</sup> Third party entities include suppliers and service providers bidding for or contracted in commercial relationships with the Organization, or partner organizations receiving, under Letters of Agreement, financial or other resources from the Organization in respect of its programmes and operations, as well as employees of such entities.

<sup>8</sup> See FAO Administrative Circular 2015/08 *Policy Against Fraud and Other Corrupt Practices*: <http://www.fao.org/aud/43301-0e63753e918fd9395cfa276ffbd275f03.pdf>

- ii. Implementing partners and service providers involved in the implementation of the FAO programme will be made aware of the mechanism and will be requested to promote awareness on the GRM among beneficiaries as part of their contractual arrangement with FAO.
- iii. Any FAO personnel, who is approached for a grievance or concern, should refer the Complainant to the designated channels for submission of grievances (See Section 5 below). The FAO personnel will inform the GRO that he has been approached with an expression of concern specifying by whom, for what reason and how the potential complainant can be contacted. The GRO will approach the person to offer assistance in filing a grievance in line with the provision of section 5.1.

## 5 Grievance Review Process

### 5.1 Communicating Grievances

- 9. Any person, group, or representative of a person or a group, who is directly engaged in or affected by an FAO activity in Georgia, can submit a grievance. A grievance can be received by the FAO office in writing using the form provided in Annex II through email, at the address [fao-georgia-grants@fao.org](mailto:fao-georgia-grants@fao.org);
- 10. In case of need, beneficiaries can seek assistance of the GRO in filing a grievance through one of the above-mentioned channels calling landline (+995 32) 235 9440.
- 11. In cases when government counterpart or resource partners bring beneficiaries' concerns to FAO attention, the GRO will follow up with the concerned beneficiaries and when appropriate, encourage submission through the designated channels.

### 5.2 Registering the Grievances

- 12. Upon receipt of the grievance, the GRO will create an entry in the grievances registry and conduct a preliminary screening of the grievance to ensure that sufficient information is provided to proceed with the eligibility screening and follow-up. If crucial information as per the Grievance Submission Form (annex II) is missing, the GRO will contact the Complainant to fill in the necessary information.

The following information to be recorded in the grievance registry<sup>9</sup>:

- i. Date of grievance;
- ii. Dedicated reference number (composed of the serial number of the grievance followed by the year of submission);
- iii. Code of the project to which the grievance is referring;
- iv. Geographical location of the related programme or project activities;
- v. Name of Complainant;
- vi. Gender of Complainant (if applicable);

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<sup>9</sup> Two copies of the registry will be created. One file will contain hard copies of all submitted and reviewed documents, the verification report and a summary of the case. A duplicate soft file will be saved in the registry of FAO Georgia.

- vii. Description of affected individual(s)/group(s) in relation to FAO programme;
- viii. Brief description of the grievance.

- 13. Anonymous grievances are not accepted. However, the Complainant's name will be kept confidential upon request.
- 14. Grievances should be as specific as possible, describing actual or potential adverse impacts that have a plausible causal link to the FAO programme.
- 15. The Complainant may revise or complete the grievance submitted providing additional information or new instances of concern at any time before the eligibility of the grievance is determined and communicated.
- 16. GRO will acknowledge the receipt of all grievances.

### 5.3 Screening Grievances for Eligibility

- 17. The GRO screens the grievance and the available documentation in order to determine the eligibility for review and determine the appropriate channel for review by FAO. Eligibility is assessed on the following basis:
  - i. **Non-grievances:** requests for information and other project related queries by beneficiaries, partners and suppliers. The GRO will directly forward these to the concerned FAO personnel for follow up.
  - ii. **Non-eligible grievances:** are grievances that do not meet the eligibility criteria for review (see paragraph 17.d) including grievances relating to projects or programmes that are not supported by FAO or for which FAO's support has ended and FAO actions can no longer reasonably be considered cause of the concerns raised. The GRO will ensure that the justification for the ineligibility of the grievance is communicated to the Complainant.
  - iii. **Grievances to be referred to Office of the Inspector General (OIG):** Allegations of fraud, corruption or other types of misconduct by FAO personnel or by third parties<sup>10</sup> should be made directly to OIG for investigation<sup>11</sup>.

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<sup>10</sup> Third party entities include suppliers and service providers bidding for or contracted in commercial relationships with the Organization, or partner organizations receiving, under Letters of Agreement, financial or other resources from the Organization in respect of its programmes and operations, as well as employees of such entities.

<sup>11</sup> Such complaints need not include firm evidence of the alleged unsatisfactory conduct and/or wrongdoing, however, they should include a reasonable level of information, as stated in the *Guidelines for internal administrative investigations by the OIG* (2016): <http://www.fao.org/aud/45778-04d41508f251e4fe747356ac586656463.pdf>

#### iv. Eligible Grievances<sup>12</sup>:

- a. Alleged or potential violations of the Organization's Environmental and Social policies under an FAO programme in Georgia. This refers specifically to the Organization's nine ESS as defined in the *Environmental and Social Management Guidelines*<sup>13</sup>:
  - ESS 1: Natural Resource Management
  - ESS 2: Biodiversity, Ecosystems and Critical Habitats
  - ESS 3: Plant Genetic Resources for Food and Agriculture
  - ESS 4: Animal - Livestock and Aquatic - Genetic Resources for Food and Agriculture
  - ESS 5: Pest and Pesticide Management
  - ESS 6: Involuntary Resettlement and Displacement
  - ESS 7: Decent Work
  - ESS 8: Gender Equality
  - ESS 9: Indigenous Peoples and Cultural Heritage
- b. Concerns regarding FAO's programming in each phase of the project cycle as set out in FAO's AAP commitment 3<sup>14</sup> including among others whether targeting was correct, programmes are being implemented appropriately, and potential negative impact that programmes are perceived to be having on participants.

#### 5.4 Processing Eligible Grievances

18. When a grievance is found eligible during the screening stage, the GRO suggests the composition of a Grievance Review Committee (GRC) for FAO management endorsement. The GRC members are nominated consistently with the following criteria:
  - i. Preventing conflict of interest;
  - ii. Guaranteeing gender-balance;
  - iii. Ensuring technical qualification relevant to the grievance.
19. When determining the specific procedure to be undertaken in processing a grievance, the GRC should ensure fairness and objectivity and to that effect ensure that the following actions are undertaken:
  - i. Review relevant project documentation and consult relevant project personnel from FAO, government and implementing partners as applicable;

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<sup>12</sup> All complaints must indicate what steps the complainant has taken to try to resolve their complaints with the programme management, and the results of those attempts. Complaints filed by those who have not attempted in good faith to resolve their concerns with the project management, or have not demonstrated a good reason for not approaching the project management (e.g., fears about their safety), will be inadmissible.

<sup>13</sup> FAO 2015. "Environmental and Social Management Guidelines" <http://www.fao.org/3/a-i4413e.pdf>

<sup>14</sup> For more information please refer to FAO's Guidance Note on Accountability to Affected Populations (AAP): [http://www.fao.org/fileadmin/user\\_upload/emergencies/docs/Guidance%20Note\\_Accountability\\_Publi.pdf](http://www.fao.org/fileadmin/user_upload/emergencies/docs/Guidance%20Note_Accountability_Publi.pdf)

- ii. Plan for and supervise a field verification to be carried out by the assigned GVO, to gather information using clear methodology and approach;
  - iii. Take into consideration interests and point of views of the different parties involved.
20. Once the review procedure and timeline for implementation are agreed upon, the GRC assigns a GVO to conduct the review.
  21. The GVO will conduct the verification following the GRC guidance, which may include one or more of the following:
    - i. collection and analysis of relevant documentation;
    - ii. interviews with relevant individuals/beneficiaries/partners/staff, etc.;
    - iii. observational field visits.
  22. After completing the verification, the GVO will submit a draft verification report to the GRC attaching all relevant supporting documents. The report should include:
    - i. a description of the methodology used to verify the complaint;
    - ii. any factual findings, that may explain specific circumstances and perceptions, confirming or contradicting the grievance received;
    - iii. recommendations for addressing or resolving the grievance, which may include specific actions as well as revision of approaches and procedures for FAO consideration.
  23. The GRC reviews the verification report and may seek further verification or revise findings and recommendations before submitting to the FAO Representative (FAOR) a report for endorsement.

## **5.5 Feedback**

24. The FAOR will further review the report and may consult with relevant personnel or partners and request further clarifications or verifications to the GRC. Following this review, the FAOR will endorse the report and related recommendations, and instruct relevant personnel to implement the recommended actions in line with FAO rules and regulations, taking into account relevant circumstances and subject to availability of resources.
25. Results of the grievance review and follow up actions taken will be communicated to the Complainant by the GRO.
26. Should the complainant consider unsatisfactorily the response received regarding alleged or potential violations of FAO's ESS, he may file a complaint requesting a Compliance Review to OIG in accordance with the Guidelines for Compliance Reviews<sup>15</sup>.

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<sup>15</sup> FAO 2015. "Compliance Reviews Following Complaints Related to the Organization's Environmental and Social Standards" <http://www.fao.org/aud/42564-03173af392b352dc16b6cec72fa7ab27f.pdf>

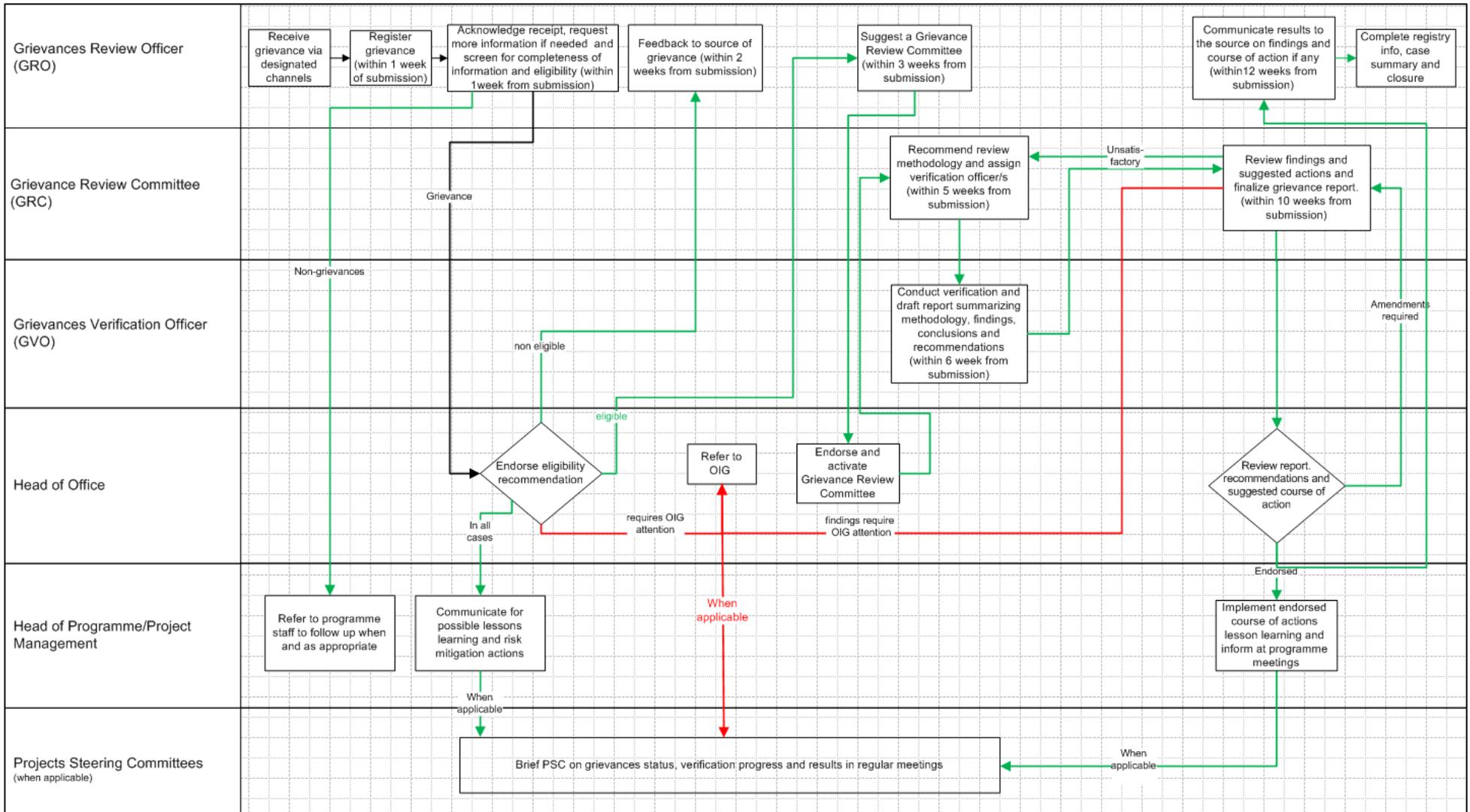
## **5.6 Conclusion of the Grievance Review**

27. Upon the conclusion of the grievance review process, the GRO will ensure that the following information is recoded in the grievance registry in addition to those recorded when registering the grievance (see para 13 above):
  - i. Result of the grievance eligibility screening;
  - ii. GRC composition;
  - iii. Name of GVO;
  - iv. Verification method followed;
  - v. The final grievance review report;
  - vi. Summary of follow up action taken or to be taken;
  - vii. Documentation of the communication to the complainant of the conclusion of the review process and follow up actions;
  - viii. Any other relevant documentation.

## **6 Reporting and Lessons Learned**

28. Information on results of each grievance review (either at the screening for eligibility stage or at the closing stage of the grievance review) will be presented to the FAO programme staff meetings with a focus on drawing lessons for future activities.
29. For grievance referring to activities implemented as part of a specific project, briefing will be provided to the relevant Project Steering Committees (PSC) or other relevant project coordination or governing bodies to inform about (i) grievances received, including those referred to OIG as per paragraph 6 under section 2.2 above, and (ii) result of the screening and verification process.
30. Information on grievances received, actions taken and lessons learned will be periodically reported to relevant FAO units.
31. These GRM guidelines will be updated as needed to take into account lessons learned and to ensure consistency with relevant FAO guidelines and regulations.

# Annex I: Grievance Review Mechanism Process Flow



## Annex II: Grievance Submission Form

FAO GEORGIA office has established a Grievance Review Mechanism (GRM) to provide beneficiaries of FAO programmes with a transparent mechanism to provide feedback and voice concerns, trigger appropriate corrective actions and receive feedback on actions taken.

Any person, group, or representative of a person or a group, who is directly engaged in or affected by an FAO activity in Georgia can submit a grievance in writing using this form and transmitting it through email ([FAO-GE@FAO.org](mailto:FAO-GE@FAO.org)), or in person to one of the FAO offices.

### I. Information concerning the Complainant

1. Full Name <sup>16</sup>	.....
2. Date of birth	..... /..... /.....
3. Place of birth	.....
4. Nationality	.....
5. ID number	.....
6. Sex	<input type="checkbox"/> Male <input type="checkbox"/> Female
7. Occupation	.....
8. Present address	.....
9. Mobile number	.....
10. Status of Complainant	<input type="checkbox"/> affected person, <input type="checkbox"/> on behalf of affected person Have you obtained the consent of the person on behalf of whom you are submitting this complaint? <input type="checkbox"/> Yes <input type="checkbox"/> No

### II. Information concerning the affected person/group if other than the Complainant

1. Full Name	.....
2. Date of birth	..... /..... /.....
3. Place of birth	.....
4. Nationality	.....
5. ID number	.....
6. Sex	<input type="checkbox"/> Male <input type="checkbox"/> Female

<sup>16</sup> Anonymous grievances are not accepted. However, the Complainant's name will be kept confidential upon request

