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Department of Infrastructure and Energy

**GEOHERMAL RISK MITIGATION FACILITY  
FOR EASTERN AFRICA (GRMF)**



**KFW**

**Grievance Mechanism for  
the Geothermal Risk  
Mitigation Facility for  
Eastern Africa**

24 November 2020

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## Acronyms and Abbreviations

AUC	African Union Commission
E&S	Environmental and Social
ESMS	Environmental and Social Management System
GRMF	Geothermal Risk Mitigation Facility
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standards
KfW	KfW Development Bank
OC	Oversight Committee
UNHR	United Nations Human Rights Office of the High Commissioner
UNHR GP	United Nations Human Rights Office of the High Commissioner Guidance Principle on Business and Human Rights

## 1. INTRODUCTION

In order to mitigate the high risk of geothermal exploration and reservoir confirmation drilling, the African Union Commission (AUC) with the German Federal Ministry for Economic Cooperation and Development and the European Union Africa Infrastructure Trust Fund through KfW Development Bank (KfW), have agreed to establish the Geothermal Risk Mitigation Facility (GRMF) for Eastern Africa. The GRMF published a Developer Manual (Eleventh Edition, 28 April 2020) outlining the requirements the applicants have to comply with including Environmental and Social (E&S) requirements. The Developer Manual requires grantees to comply with the KfW's Sustainability Guideline and therewith International E&S Safeguards.

The Grievance Mechanism at hand supports this Developer Manual and will be used by GRMF stakeholders where applicable.

The GRMF Grievance Mechanism is aligned with the guidance of:

- International Finance Corporation Performance Standards (IFC PS), 2012; and
- United Nations Human Rights Office of the High Commissioner Guidance Principal on Business and Human Rights (UNHR GP), 2011.

The guidance is also aligned with the current "GRMF Complaint Mechanism" indicated on the GRMF website (<https://grmf-eastafrica.org/contact/>).

*Note:* GRMF's Grievance Mechanism described below is distinct from, but complementary to the grievance redress mechanisms that are required by GRMF grantees, as described in the GRMF Developer Manual. As mentioned in the Developer Manual (2020), grantees are required to establish, operate and document a grievance redress mechanism, which is "accessible, transparent and culturally appropriate [...] for the affected public as well as a separate GRMF for project workforce, in line with the Applicable Standards."

## 2. APPLICABLE GUIDANCE

### 2.1 IFC Performance Standards

The IFC PS require all clients to develop a Grievance Mechanism. Clients will respond to concerns and grievances of all stakeholders including the general public, parties with a direct and indirect interest in the project and affected communities (external) and workers (internal) related to the E&S performance of the project in a timely manner. The scope, scale and type of the Grievance Mechanism will be proportionate to the client's E&S risks.

According to the IFC PS1 *Assessment and Management of Environmental and Social Risks and Impacts*, the procedure for external communication should include methods to “(i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate.” The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.” In addition to the general principles included in PS1, specific requirements for managing external grievances are included under PS4, 5, and 7.

According to the IFC PS2 *Labor and Working Conditions*, the internal Grievance Mechanism for workers will also be provided to raise workplace concerns. “The client will inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed. The mechanism should not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.”

### 2.2 UNHR Guidance Principal on Business and Human Rights

According to the Guidance Principle on Business and Human Rights of the United Nations Human Rights Office of the High Commissioner (UNHR GP), operational-level Grievance Mechanisms can provide important feedback on the effectiveness of the business enterprise's human rights due diligence from those directly affected.

The UNHR GP defines a grievance as “a perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities.”

The Grievance Mechanism is defined as “any routinized, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought.”

The UNHR GP demands that business enterprises should establish or participate in effective operational-level Grievance Mechanisms for individuals and communities who may be adversely impacted in order to address grievances early and remediate them directly.

Regarding companies' responsibility to respect human rights, the UNHR GP summarizes the following two key functions:

1. They support the identification of adverse human rights impacts as a part of an enterprise's ongoing human rights due diligence. They do so by providing a channel for those directly

impacted by the enterprise's operations to raise concerns when they believe they are being or will be adversely impacted. By analysing trends and patterns in complaints, business enterprises can also identify systemic problems and adapt their practices accordingly;

2. These mechanisms make it possible for grievances, once identified, to be addressed and for adverse impacts to be remediated early and directly by the business enterprise, thereby preventing harms from compounding and grievances from escalating.

Moreover, the UNHR GP lists the following effectiveness criteria for Grievance Mechanisms:

- a) Legitimate: enabling trust from the stakeholders for whose use they are intended, and being accountable for the fair conduct of grievance processes;
- b) Accessible: being known to all stakeholders for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;
- c) Predictable: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;
- d) Equitable: seeking to ensure that complainants have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;
- e) Transparent: keeping complainants informed about the grievance review progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;
- f) Rights-compatible: ensuring that outcomes and remedies accord with internationally recognized human rights;
- g) A source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms;
- h) Be based on engagement and dialogue: consulting the stakeholders for whose use they are intended on their design and performance, focusing on dialogue as the means to address and resolve grievances, and reviewing input from stakeholders or complainants to refine the design and performance of this grievance process.

## 3. GRMF GRIEVANCE MECHANISM

### 3.1 Introduction

The Geothermal Risk Mitigation Fund (GRMF) seeks to build strong relationships with grantees and stakeholders, and to manage the impact of its business activities on potentially affected communities. Nevertheless, GRMF recognises that complaints about its activities may occur. As agreed by the GRMF Oversight Committee (OC) members, and in accordance with the principles of the African Union Commission (AUC) and its donors, GRMF provides a formalized mechanism for all GRMF applicants and grantees to report cases of misconduct in a transparent manner. Additionally, this GRMF Grievance Mechanism allows stakeholders from potentially affected communities to raise questions or concerns or provide positive feedback to GRMF and its grantees, and have them addressed in a prompt and respectful manner at no cost.

GRMF's Grievance Mechanism at hand is developed in line with best practices of the International Finance Corporation's Performance Standards (IFC PS, 2012) and the United Nations Human Rights Guiding Principles on Business and Human Rights (UNHR GP, 2011).

GRMF aims to address all complaints received, regardless of whether they stem from real or perceived issues and whether the complainant is named or anonymous. Any stakeholders who consider themselves affected by activities of GRMF operations or funded projects will have access to this Grievance Mechanism at no cost, and with no retribution. The statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process.

All GRMF grantees will have to acknowledge this Grievance Mechanism and ensure that the proper implementation is guaranteed by assigning the necessary resources and competencies. The grantee seeks to foster trust in the process and its outcomes. To this end, the grantee will communicate and engage with stakeholders regarding this GRMF Mechanism in an understandable manner, in addition to the engagement and disclosure activities regarding the grantees project-specific grievance redress mechanism (as described in the GRMF's Developer Manual 2020). The GRMF Grievance Mechanism should be communicated and grievance forms made available in the relevant local languages to facilitate access to the mechanism<sup>1</sup>. Figure 1 provides an overview of the GRMF Grievance Mechanism and how it interacts with grantee grievance redress mechanisms.

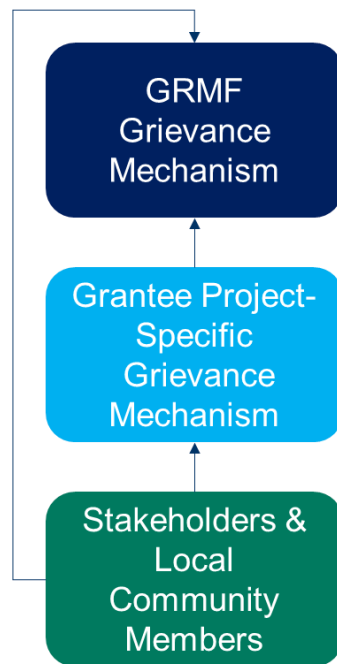
The GRMF Grievance Mechanism is free, open and accessible to all, and grievances will be addressed in a fair and transparent manner. Confidentiality will be respected and GRMF will take all reasonable steps to protect parties to the process from retribution.

This document explains the purpose of the Grievance Mechanism, who can submit a grievance, where and how it can be submitted, and it describes the internal process of handling and responding to grievances.

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<sup>1</sup> GRFM will collaborate with the grantee regarding development of information and forms in the local language, on a project by project basis, and based on input the grantee has from their engagement activities.





**Figure 1: Overview of GRMF and Grantee Grievance Mechanisms**

### 3.2 Purpose

This Grievance Mechanism establishes the process for addressing complaints raised in connection with activities of GRMF funded projects. Through this mechanism, the GRMF seeks to understand the issues that are, or are likely to be, risks to the GRMF; through this mechanism, the GRMF intends to understand and resolve issues collaboratively with grantees, where necessary, before they escalate.

This Grievance Mechanism describes the scope and procedural steps for the complaint handling process and specifies roles and responsibilities of the parties involved. It will be revised and updated periodically by the responsible person within GRMF (the Chairperson of the GRMF Oversight Committee - Director of the AUC Infrastructure & Energy Department; or the designated Grievance Manager, if applicable) based on experience and feedback from stakeholders and grantees.

The Grievance Mechanism will be monitored and evaluated annually, and updated as needed.

As described in the Developer Manual (2020), each grantee is responsible for handling grievances related to its activities and will regularly report to GRMF as part of the overall project monitoring.

### 3.3 Objectives

GRMF's Grievance Mechanism has been developed with the following objectives:

- to build and maintain trust with all of GRMF's stakeholders;
- to identify and address stakeholder concerns in a timely manner, and thus support effective risk management;
- to ensure proper documentation (logging) of complaints and any corrective actions taken;
- to support reporting to potentially affected communities on actions taken to resolve their concerns and publicize successful complaint resolution, so as to build and maintain trust with GRMF stakeholders; to serve as a next-level entry point for grievances that have been submitted at project level of a GRMF-funded project, including any grievances submitted to a grantee but not resolved through proposed mitigation measures; and

- to contribute to continuous improvement in performance through the analysis of trends and lessons learned.

### 3.4 Terminology

Terminology used in this Grievance Mechanism has the following meaning:

<b>Term</b>	<b>Definition</b>
<b>Complainant</b>	An individual, group or organization who submits a complaint to the grantee.
<b>Complaint or Grievance</b>	An expression of dissatisfaction with the activities of GRMF or a grantee, typically referring to a specific source of concern and/or seeking a specific solution. Complaints can result from either real or perceived impacts of GRMF or a grantee's operations. For the purposes of this Grievance Mechanism, a question or request may also be treated as a complaint.
<b>Contractor</b>	An individual or firm that has entered into a contract to provide goods or services to the grantee. The term covers parties directly contracted by the grantee and those contracted by a contractor company, also referred to as subcontractors.
<b>GRMF's Grantee or Grantee</b>	A company or an organization that receives a grant directly from GRMF.
<b>Grievance Form (Appendix A)</b>	A form used to capture information about an incoming complaint.
<b>Grievance Resolution Form (Appendix B)</b>	A form used to capture information about the resolution of a grievance, including the complainant's perspective of that resolution.
<b>Grievance Log (Appendix C)</b>	A database for maintaining information about complaints received, including the issue, any engagement with the complainant, results of the investigation and the resolution of the issue.
<b>Projects</b>	Project or project activities funded by the GRMF (see also definition in the GRMF Environmental and Social Management System (ESMS)).

### 3.5 Roles and Responsibilities for GRMF and the Grantee

Roles and responsibilities under this Grievance Mechanism are as follows:

Role	Responsibility
<b>Chairperson of the GRMF Oversight Committee (Director of the AUC Infrastructure &amp; Energy Department)</b>	Person within GRMF who is responsible for the implementation of this Grievance Mechanism. This includes serving as custodian of the complaints process, including promotion or communication about the mechanism to stakeholders. The Chairperson is responsible for receiving and acknowledging complaints, supporting the investigation and implementation of mitigation measures, and managing the closure or resolution of grievances (i.e., implementation of the grievance steps, as outlined in Section 3.7.4). As needed, the Chairperson will review the process and suggest changes to policies or practices based on lessons learned.
<b>GRMF Grievance Manager</b>	Person within GRMF responsible for receiving and acknowledging complaints, supporting the investigation and implementation of mitigation measures, and managing the closure or resolution of grievances (i.e., implementation of the grievance steps, as outlined in Section 3.7.4). Review of Grievance Log and review of closure/resolution of grievances for the projects that fall within the respective region. Liaise directly with the grantees and thus assist and help resolving grievances on the ground. This includes review of regular (e.g., monthly) grievance reports regarding the status of grievances received at a project site.
<b>Grantee Complaint Owner</b>	A role of the grantee. Responsible for receiving, investigating and resolving a complaint, as part of their stakeholder engagement activities, as described in the Developer Manual (2020). This includes conducting investigations, proposing resolutions, implementing corrective actions and coordinating with personnel on the ground and other parties. The Grantee Complaint Owner will also implement a process to report to communities regarding the management of grievances. On a regular basis (e.g., monthly), the Grantee Complaint Owner will report to the GRMF Grievance Manager and Chairperson of the GRMF Oversight Committee regarding the management of grievances, highlighting the number of issues that are resolved or outstanding. In this way, the GRMF will have an understanding of potential risks associated with GRMF-funded projects.
<b>Grievance Mediation Committee, as required</b>	A committee that will be convened, as required, to review complaints that cannot be resolved through the grievance investigation and mitigation process. The Committee will be composed of the GRMF Chairperson, the grantee's grievance manager, a representative of the affected stakeholder or third party representative, a representative of the donor (i.e., KfW, as needed). These committees will be convened as needed, for example when a grievance is not considered closed for more than 3 months, or in the case that no resolution can be identified. All meeting proceedings will be documented by the GRMF Chairperson and retained by GRMF for any follow up.

### 3.6 Key Principles of a Successful Grievance Mechanism

The key principles of a successful Grievance Mechanism are outlined in Figure 1.

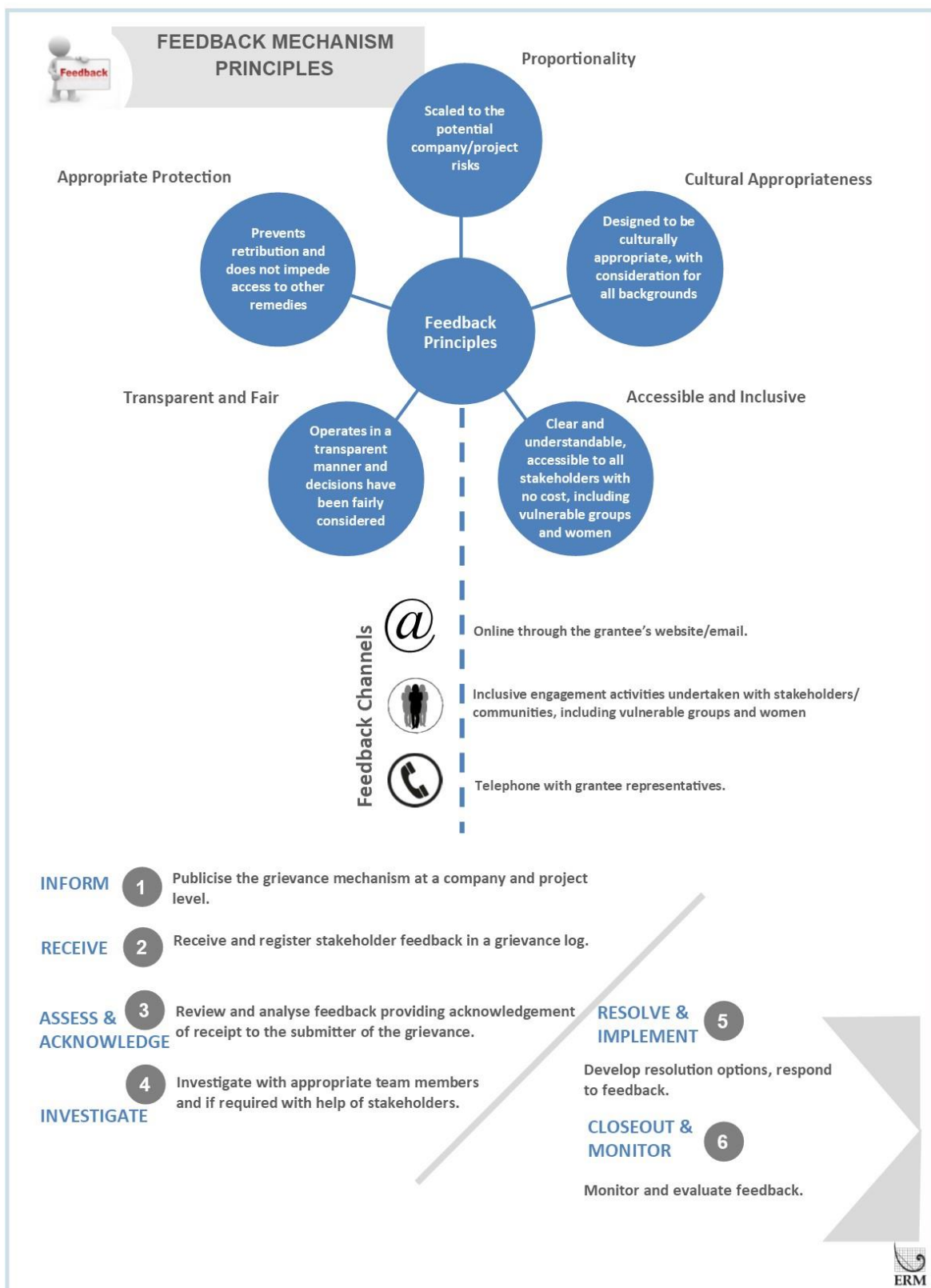


Figure 2: Key principles of a successful Grievance Mechanism

## 3.7 Grievance Management Approach

### 3.7.1 Who can submit a grievance?

The following entities can submit a grievance to GRMF:

- Individuals and groups of people who interact with GRMF, such as GRMF applicants, grantees;
- Individuals and groups of people residing in or near a project site;
- Any individual, organization, group or community who believes that a GRMF-financed project has, or is likely to, adversely affect them;
- A representative party if the persons on whose behalf the representative is acting are identified and evidence of the representative's authority to do so is provided in the complaint;
- Employees of GRMF or grantees;
- Contractors of grantee projects; and
- Non-Governmental Organizations, other civil society groups and trade unions.

### 3.7.2 Grievance Submittal Levels

Grievances can be submitted at the following levels:

1. At GRMF level:
  - a. grievances related to GRMF's operation should be directed to GRMF;
  - b. project-related grievances can be submitted to GRMF, for investigation and review by the GRMF collaboratively with the grantee;
  - c. grievances that could not be solved at project level can also be directed to GRMF;
2. At the grantee/project level: grievances related to the implementation of a project funded by GRMF should first be filed and addressed through the grantee's project-specific Grievance Mechanism<sup>2</sup>; and
3. Donors of GRMF: grievances that were not satisfactorily solved by the GRMF should be directed to GRMF's donors, including KfW Development Bank.

Grievances directed to GRMF can be submitted in the following formats:

- Written: by email, letter, or via the grievance form on the Grievance Mechanism Homepage (see template grievance form in APPENDIX A: GRMF Grievance Form )<sup>3</sup>; and/or
- Orally: in person or via telephone.

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<sup>2</sup> Each GRMF grant requires the set-up of a Grievance Mechanism by the grantee. For further information on Grievance Mechanism at project level, see GRMF's Developer Manual (2020) and ESMS.

<sup>3</sup> The grievance form template in Appendix A will be used by GRMF and posted on GRMF's homepage in order for complainants to systematically raise their concerns in a structured manner directly on GRMF's homepage.

Contact information<sup>4</sup> for the GRMF is:

**Grievance Mechanism Homepage:**

<https://grmf-eastafrica.org/contact/>

**Contact details:**

Mr. Atef Marzouk

Ag. Director for Infrastructure &  
Energy and GRMF OC Chairperson

[marzouka@africa-union.org](mailto:marzouka@africa-union.org)

Grievances received by email, letter, telephone or in person, as well as through the Grievance Form (Appendix A) will be documented by GRMF within 48 hours in the Grievance Log (Appendix B).

In the case that a complainant wants to submit an anonymous complaint, there is an option to provide the complaint details in the Grievance Form (Appendix A), which does not require personal disclosure.

### 3.7.3 Criteria for Grievances

As described on the GRMF homepage contact page<sup>5</sup>, complaints must meet the following criteria:

- The complaint must be made with regard to GRMF's operations, or one of the currently active projects funded by GRMF<sup>6</sup>;
- The complaint must include information on the main (negative) effects or risks;
- There must be a link between the GRMF's action, or the actions of a grantee, and the grounds for the complaint made; and
- The complainant believes they are or will be negatively affected by the circumstances outlined.

In the case that a grievance does not meet these criteria, the GRMF Chairperson will communicate with the complainant regarding these criteria, and will, to the best of their ability, direct the complainant to the appropriate authority or channel to address their concern.

Grievances that meet these criteria will be processed, as described in the following section.

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<sup>4</sup> Due to security reasons, the address is only available as a picture file; please type it manually in the address field of your email program.

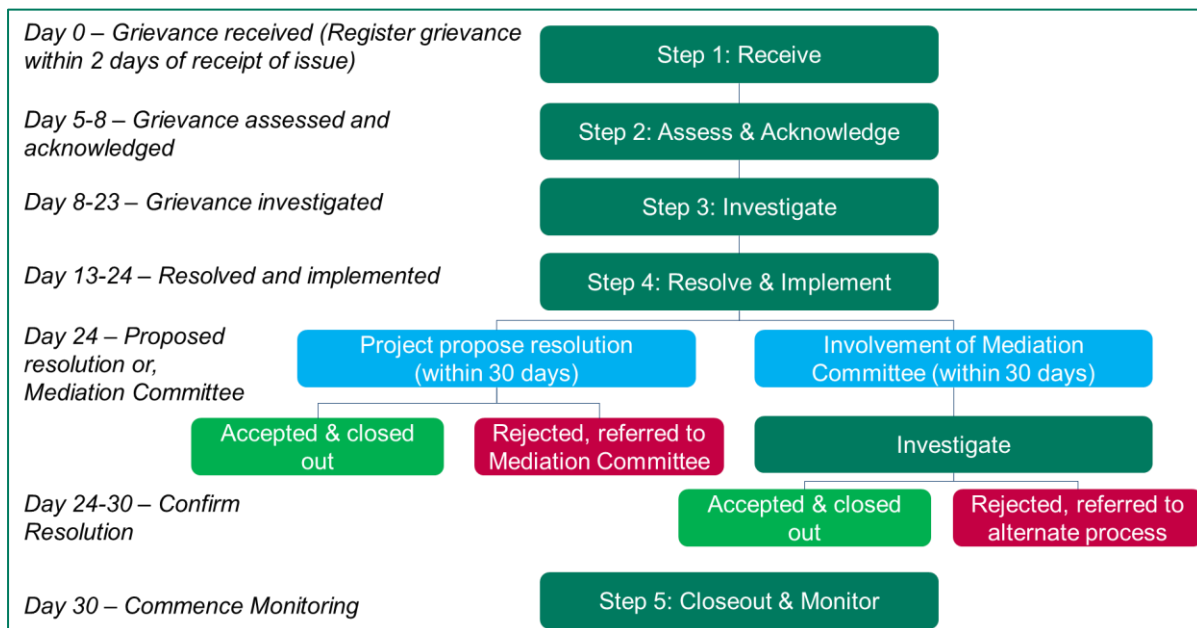
<sup>5</sup> <https://grmf-eastafrica.org/contact/>

<sup>6</sup> This includes the planning, construction, operation, and decommissioning phases of a project.

### 3.7.4 Grievance Process

A complainant can submit their complaint to the Chairperson of the GRMF Chairperson/Director of the AUC Infrastructure & Energy Department<sup>7</sup>. The Grievance Manager will support the GRMF Chairperson with the review/monitoring of grievances and the setup of the grievance committee, as well as addressing grantee complaints.

Figure 3 summarizes the GRMF Grievance Process step-by-step including the duration in days, the action to be taken, and the action's outcome.



**Figure 3: GRMF Grievance Process and Duration**

The grievance submittal step-by-step approach in line with Figure 2 and Figure 3 is detailed as follows:

#### **Step 1: Receive**

GRMF receives and registers stakeholder concerns in a grievance log (see APPENDIX C: GRMF Grievance Log).<sup>8</sup>

Grievances are classified as follows:

- Issues related to compliance with the GRMF's operational policies and procedures;
- Issues related to a grantee project (i.e., complaint that an active project has caused or will cause harm to people or the environment).

The grievance is recorded in a grievance log within 48 hours of receipt.

#### **Step 2: Assess & Acknowledge**

GRMF reviews and analyses the feedback, and provides acknowledgement of the receipt to the Complainant. Grievances will be formally acknowledged through an email or letter, as appropriate,

<sup>7</sup> If a Grievance Manager will be assigned, this person can also be the point of contact

<sup>8</sup> The grievance log template in Appendix C will be used by GRMF in order to constantly log all grievances that GRMF receives. GRMF recommends that grantees prepare grievance logs that are aligned with the GRMF Grievance Log (Appendix C) in order that there is alignment around review and reporting.

within 5-8 days from being received. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

### **Step 3: Investigate**

GRMF investigates the grievance with the appropriate team members, and if required with the help of grantees or stakeholders. The GRMF Chairperson engages with the subject matter expert(s)/ department(s) involved in the grievance and works with those experts to identify appropriate options for resolution and response.

In the case that a grievance relates to a grantee project, the GRMF Chairperson works with the Grievance Manager to understand the grantee's understanding of the issue and any measures in place to address the concern.

### **Step 4: Resolve & Implement**

A resolution is developed by the GRMF Chairperson (and Grievance Manager as required) with input from others as necessary. The proposed resolution is described in the Resolution Form (see Appendix B), and it will be reviewed by the complainant for their input and confirmation, where possible.

Required actions are then implemented to resolve the issue, and completion of these activities is recorded in the grievance log (see template in Appendix C).

The resolution is communicated to the affected party in a suitable format (e.g., phone call, email, letter). The response outlining how the issues has been resolved will be provided to the complainant within 14 days after receipt of the grievance. Should the resolution of the grievance take more than 14 days, the GRMF Chairperson provides an update to the complainant within 14 days and informs about further procedures on a regular basis.

The response of the complainant is recorded to help assess whether the grievance is closed satisfactorily, or whether further action is needed. The GRMF Chairperson should use appropriate communication channels to confirm whether the complainant has understood the resolution.

In the case that a resolution is not to the satisfaction of a complainant and further investigation into a resolution is required, the GRMF Chairperson will convene a Mediation Committee meeting.

Grievance Mediation Committee: The Grievance Mediation Committee will be convened to review the complaint and proposed resolution(s), and concerns related to the resolution. The mediation committee will collectively undertake further investigations to address concerns associated with the resolution, and propose actions to address the issue.

All Grievance Mediation Committee meetings will be documented, including attendees, grievance (reference number, and issue), proposed resolutions and why they were or were not accepted. Next steps will be identified, including any follow up meetings for monitoring or progress review.

### **Step 5: Closeout & Monitor**

Once the GRMF Chairperson has assessed that the grievance can be closed, he/she will sign off to approve closure in the internal grievance form and mark the corresponding box in the grievance log.

After the closeout of the grievance, GRMF will monitor and evaluate feedback on the resolution, and on this Grievance Mechanism, when provided.

Anonymous Grievances: Anonymous grievances will be addressed using the same process described in this section, only without the acknowledgement and engagement activities. In this way, GRMF will document, investigate and implement mitigation measures to address anonymous concerns. As there will be no option for the complainant to confirm their satisfaction with the resolution, GRMF will closely monitor the effectiveness of the resolution and manage any changes required.



## 3.8 Confidentiality, Conflicts of Interest and Protection from Retribution

### 3.8.1 Confidentiality

GRMF is committed to protecting the confidentiality and identity of the complainant. This duty extends to all GRMF employees or representatives, as well as to those employees of a GRMF grantee or its contractors who participate in the grievance process.

Information about a complaint will be shared within the grantee on a need-to-know basis and only to the extent necessary to complete a step under this Mechanism. GRMF will not share personal information with third parties unless required by law (i.e., local law of the host country of the grantee's project) or as authorized by the complainant.

### 3.8.2 Conflicts of Interest

A conflict of interest exists where an individual investigating a grievance has material, personal, or professional interest in the outcome, or personal or professional connection with complainants.

This Grievance Mechanism seeks to manage potential conflicts of interest by segregating the roles and responsibilities of individuals involved in the grievance process and avoiding placing individuals in a position where conflicts could be perceived to arise. When a complaint relates to a specific GRMF or grantee employee, that person shall not play a role in the grievance process; for example, they will recuse themselves from any investigation or participation in a Mediation Committee.

### 3.8.3 Protection from Retribution

**Does GRMF has a policy of non-retaliation?**

Retribution is any adverse action taken against a complainant as a result of their submission to the Grievance Mechanism. As described in Section 3.8.1, GRMF has implemented measures to ensure confidentiality of complainants by safeguarding personal data collected in relation to a complaint, and by allowing an option for complainants to submit anonymous grievances. GRMF will protect the grantee and all its data from retribution – all actions related with a grievance will not be retributed.

## 3.9 Monitoring, Reporting and Continuous Improvement

GRMF will monitor the effectiveness of this Grievance Mechanism. The evaluation will assess:

- The degree to which the Grievance Mechanism is being implemented as planned;
- Whether the Grievance Mechanism is working effectively;
- Potential areas of improvement and of concern regarding the Grievance Mechanism.

The evaluation will consider the following performance indicators:

- Number and type (classification) of grievances registered;
- Percentage (%) of grievances resolved and closed / not resolved through Mechanism;
- Grievance resolution time;
- Rate and grievance resolution time; and
- Number of complaints resolved through Grievance Mediation Committee or referred to a third party.

Through the monitoring and review process, corrective actions may be implemented to the Grievance Mechanism.

On an annual basis, GRMF will publish a report on the implementation of this Grievance Mechanism, and solicit input for any changes to make the process more effective or legitimate. The report will not include any personal data; rather, it will disclose general trends related to the receipt and resolution of issues. This report will be publically available, and may also be used for reporting to GRMF donors.

## APPENDIX A: GRMF GRIEVANCE FORM

## GRMF Grievance Form

**Reference No. (assigned by GRMF):**

Please enter your contact information and grievance. This information will be dealt with confidentially.

Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be addressed through the same process.

<b>Full Name</b>	
<b>Anonymous submission</b>	<input type="checkbox"/> I want to remain anonymous
<b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>  You may be contacted during the investigation of the complaint, and to provide information on the issue resolution.	<input type="checkbox"/> <b>By mail (please provide e-mail address):</b> _____  <input type="checkbox"/> <b>By telephone (please provide telephone number):</b> _____  <input type="checkbox"/> <b>Via a third party (please provide third party's contact details):</b> _____
<b>Preferred language for communication</b>	<input type="checkbox"/> English <input type="checkbox"/> Other, please specify: _____

<b>Description of incident or grievance:</b>	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
<b>Date of incident/grievance:</b> _____	<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)
<b>Has this grievance already been filed at the grantee/project level (i.e. with the geothermal project developer in your country)?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	If yes, please explain below why the grievance has not been resolved to your satisfaction:  _____  _____

<b>What is your proposed approach to resolve the problem?</b>

Please return grievance form to:

Mr. Atef Marzouk

GRMF OC Chairperson (Ag. Director for Infrastructure & Energy)

[marzouka@africa-union.org](mailto:marzouka@africa-union.org)

## APPENIX B: GRMF GRIEVANCE RESOLUTION FORM

## GRMF Grievance Resolution Form

Reference No. :

Name of  
Complainant

Name of Respondent

Date of Complaint  
Submission

Address

Tel.

Description  
of incident  
or  
grievance:

Complaint  
Response  
or  
Corrective  
Action(s):

Internal  
GRMF  
Communica  
tion (if any):

Response Satisfactory?

Yes

No

Signature of Complainant

## APPENDIX C: GRMF GRIEVANCE LOG

## GRMF Grievance Log<sup>9</sup>

GRMF Grievance Register									
Number	Date of the Receipt	Type of Receipt	Name of the Complainant	Description of the Grievance	Grievance Issued to Relevant Department	Due Date for the Response	Actual Response Date	Details of Corrective and Preventive Action	Response Date to the Complainant

<sup>9</sup> This Grievance Log template should be transcribed to an Excel spreadsheet or into a database, such that all the applicable information is captured consistently and continuously for each complaint.

## REFERENCES

GRMF. 2020. *Developer Manual*.

UNHR. 2011. *Guiding Principles on Business and Human Rights. Implementing the United Nations “Protect, Respect and Remedy” Framework*.

IFC. 2012. *Performance Standards on Environmental and Social Sustainability*.

IFC. 2012. *International Finance Corporation’s Guidance Notes: Performance Standards on Environmental and Social Sustainability*.