ECOWAS CENTRE FOR RENEWABLE ENERGY AND ENERGY EFFICIENCY- ECREEE

GRIEVANCES REDRESS POLICY AND MECHANISM (GRM)

Issue Date: 6th May, 2019
Effective: August, 2019
Review frequency: Yearly
Revised Date:

Content:

ECREEE Grievances Redress Policy and Mechanism -GRM is designed to ensure that any employee, or any individual or group or community who believe they are or might be adversely affected by the centers operations, programme, and projects is able to file a grievance or complaint and receive resolution using the center’s established grievance procedure.

Approval: Executive Board

Access to Information Policy Designation - Public
1) The Policy

ECREEE is committed to providing a safe, fair and harmonious working environment, minimizing all risks associated with the implementation of its projects and programmes and building confidence and trust of all stakeholders through a structured, transparent, and reliable and effective process for obtaining feedback from those affected by its operations.

ECREEE establishes this Grievance Redress Mechanism (GRM) Policy and Procedures to address any grievances and or complaints by a person, a group of persons or a community who have been or may be adversely impacted by activities implemented by the center in the process of fulfilling its mandate.

Through this policy, ECREEE will endeavor to take grievances seriously, treat all issues fairly and address all complaints in relation to its activities which are causes for grievances, for whatever reason, in a reasonable time and manner through a suitable mechanism.

The GRM will be integrated throughout the institutions operations and is premised on the following principles;

Access to information and transparency: To ensure provision of information on organizational policies, projects and activities to the maximum extent possible to all stakeholders.

Awareness: To make available information on its Grievances Redress Mechanism–GRM to all stakeholders at all times.

Accountability: To develop a responsive and accountable process for a fair, impartial and consistent mechanism for redressal of varied issues faced by all stakeholders.

The objectives of this Policy are to:

— Establish a timely, consistent, structured, and trusted procedure for receiving and addressing all concerns and complaints by stakeholders;
— Ensure that complainants are treated with respect and in a confidential manner;
— Ensure the proper documentation and disclosure of complaints and any resulting remedy or corrective actions;
— Enhance continuous improvement in its operations and maintaining high standards of project impact;

2) Standard Operation Procedures (SOP) for Reporting Grievances

In addition to regular information requests, individuals, groups, communities, organizations or corporations affected by ECREEE activities can make complaints about actions, decisions and activities that stakeholders feel ECREEE has carried out incorrectly, unfairly or unlawfully via the following procedures;

---

1 For the purpose of this policy, grievance means a formal complaint. It includes any kind of discontent or dissatisfaction or negative perception expressed, arising out of anything connected with ECREEE that a person, group or community thinks, believes, or even feels, is unfair, unjust or inequitable.

2 Redress means to set right or remedy an adverse impact arising from a grievance caused by a project or programme implemented by the ECREEE in the ECOWAS member countries, including bringing such project or programme into compliance with the correct standard operational policies.
GRM PROCEDURE:

Any member of the public shall make a complaint in any of the 3 official ECOWAS languages (English, French and Portuguese) by

- Written email addressed to the Executive Director to
  
  complaints@ecreee.org

  OR

- Completing the online form available at the following address:
  
  http://www.ecreee.org/page/grievance-form

  OR

- Hand delivered directly to ECREEE in person or through any ECREEE staff

  OR

- Written postage to the following address

  2nd Floor, Electra Building,  
  Achada Santo Antonio  
  Electra Building, 2nd floor  
  C.P. 288, Praia, Cape Verde

  OR

- Phone call directly to the ECREEE secretariat

  +238 2604630, +238 2624608  
  Requesting to speak with to Head of institution: Mr. Mahama Kappiah

- Complaints (written or non-written) can only be processed in one of the official languages of ECOWAS. Complainants have the right to receive a reply in the same language. For complaints, which are not received in one of the official languages, the complainant shall be informed of this provision and requested to provide a copy of the complaint in one of the official languages of the ECOWAS.
Upon receipt of a complaint by email, the ECREEE Grievance Mechanism Unit (ECREEE-GRM) will ensure that an acknowledgment of receipt is sent to the complainant within five (5) working days. If by post, an acknowledgment will be sent to the complainant within ten (10) working days. The acknowledgement shall provide a summary of the complaint and inform the complainant of the date by which ECREEE’s official reply to the complaint maybe expected.

In the case that the complaint is not connected to the Institution (ECREEE) the (ECREEE-GRM) Unit will endeavor to provide, if possible, the complainant with advice on which institution/body his/her concerns may be addressed.

If the complaint is connected to the Institution (ECREEE) the (ECREEE-GRM) Unit will make a summary of the complaint based on the facts which have been put forward, the outcome of any enquiries it carried out up to that point shall be documented in the Grievance Register before forwarding the Complaint Brief to the Grievance Redress Committee for a resolution decision.

The Grievance Redress Committee may launch a full inquiry into the issue(s) raised by the complainant; it will review the pertinent documentation and records and were necessary will hold meetings with the appropriate internal and external stakeholders in order to gather all the required information.

The Grievance Redress Committee will then provide recommendations and corrective actions in a Draft Resolution Report and submit to the Executive Director for information and decision. The Executive Director shall make best effort to take the decision on whether or not to apply the recommendations and corrective actions provided by the committee or propose appropriate corrective actions.

The ECREEE GRM Unit will then send the Final Resolution Report with a Corrective Action Plan to the complainant(s) with the Executive Director’s decision.

In case the complainant is not satisfied with the response, s/he has the right to resubmit a confirmatory complaint within ten (10) working days by phone or fifteen (15) working days in writing. The ECREEE-GRM unit will endeavor to follow the same procedure as for the initial complaint to this confirmatory complaint.

In case the complainant deems that the agreed corrective actions are still not implemented correctly or within the imposed timeframe or the resolutions is not satisfactory, the complainant can escalate the complaint within one (1) month from the received date of resolutions report in writing to the ECREEE Executive Board for review of the case via the same reporting procedure addressed to the ECREEE Executive Board.

In order to safeguard the interest of the complainants, complaints lodged under the ECREEE’s GRM will be dealt with confidentially unless otherwise requested by the complainant. Whereby the complainant waives his or her right to confidentiality the resolutions report will be published together with relevant correspondence by ECREEE on its website.

3 Length of duration based on overseas postage and can vary.
3) Project Level GRM

The ECREEE project-level grievance and redress mechanism is a process for receiving, evaluating, and addressing project related grievances from affected individuals or communities at the project level. It is a core component of managing operational risks and improving the project’s impacts and results.

The project level GRM will also address grievances against contractors, subcontractors and executing entities within an ECREEE lead project and project related complaints will be addressed accordingly by the different stakeholders working on a project —private companies, commercial financial institutions, financial, and all other 3rd party implementation and executing agencies.

Regardless of project size, ECREEE shall effectively address and manage possible grievances from people impacted by ECREEE projects through the following preventive processes and tools;

a) Stakeholder identification and consultation
b) Risk identification and mitigation plan
c) Environmental and social impact assessment
d) Gender assessment
e) Project information disclosure

The scope of each of the above project level GRM requirements is detailed in the ECREEE project preparation and appraisal guidelines.

4. Grievance Redressal Committee and Procedure

A senior level committee handles the remedying of grievances at ECREEE. The committee only considers formal grievances reported to ECREEE via the established procedure in item 2. The ECREEE GRM committee is made up of two tier system;

The first tier is the operational committee concerned with day to day operations of the center and in remedying all project related grievances. They carry out preliminary investigations and provide recommendations on resolutions of the grievance to the head of institution (Executive Director).

First tier committee members include

1. Director of RE & EE, Project Development and Funds Mobilization  
2. M& E Officer  
3. Principal Renewable Energy Officer  
4. Principal Energy efficiency officer

Main functions of the ECREEE GRM Committee:

- To provide proper advocacy to stakeholders to express their grievances freely and frankly;
- To ensure that there is no reprisal of any kind against any complainant, witness, or any other witness in the grievance redressal process.
- To conduct formal inquiries and investigation as the case may be;
• To protect the privacy and confidentiality of all parties during the investigation, consistent with and subject to the policy guidelines;
• To obtain the facts through relevant sources in a fair and objective manner,
• to work out a resolution of the issues involved with the parties;
• To ensure speedy resolution of grievance within an acceptable period of time.

The second tier committee is made of the ECREEE Executive Board which includes representatives of member states i.e. National focal institutions, representative of donor institutions and the ECOWAS commission. The second tier undertakes yearly grievance reviews and handles only escalated and unresolved cases as explained in the standard operation procedure (SOP).

**Diagram 1: ECREEE Grievance Redressal**
5. General Guidelines

5.1 A grievance complaint shall include:

- A clear and concise statement of the event/issues, and a summary of steps taken, if any, by the complainant to resolve the problem or issues prior to the filing the complaint;
- A reasonably detailed description of the relevant facts, including the name/s of person/s, copies of relevant documents or other evidence relevant to the grievance;
- Full names, contact information of the person escalating/initiating the grievance complaint.

5.2 Group Grievance: If, it is a group grievance, list of all persons who are parties to the grievance to be attached. The list must include each person's name, National ID, Phone number/Email ID, etc. The list must also designate one individual as spokesperson for the group;

5.3 Confidentiality and Documentation: ECREEE shall maintain confidentiality of information shared throughout the grievance process. All information collected will be treated as confidential and will not be disclosed to third parties without the consent of the parties involved. However, disclosures may be required for the purpose of fact-finding or efforts to resolve the grievance. Parties involved in the grievance process will also have to maintain the confidentiality of the information discussed during the fact-finding process and the identity of the grievant.