



Ecosystem-based Adaptation to climate change in Maputo Environmental Protection Area (MEPA): Conserving and Building Resilience

Annex C.1: Complaint & Feedback Mechanism (Grievance Mechanism)

Peace Parks Foundation
ADRA Deutschland

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Table of Contents

1. Introduction	1
1.1. Purpose of the Grievance Mechanism	2
2. Eligibility Criteria.....	3
3. Grievance Procedures	5
3.1. Level/Stage 1 (Low Risk): Local-level resolution sought.....	7
3.2. Level/Stage 2 (Medium Risk): National Level Grievance Resolution.....	9
3.3. Level/Stage 3 (High Risk): Blue Action Fund's Project Complaints Management System	10
4. Informing Stakeholders about the Grievance System.....	10
5. Serious Incident Reporting	11
6. Maintaining Records and Monitoring Actions.....	12
Annex C.2 Grievance Register: Grievance Register Template	13
Annex F.3: Template for Public Grievance Form	14
Annex F.4: Template for a Serious Incident Report	15

1. Introduction

This **Complaint and Feedback Mechanism** (hereafter referred to as the “**Grievance Mechanism**”) is designed as an integrated component of a project developed for the **Blue Action Fund** (BAF) by **Peace Parks Foundation** and **ADRA Germany** in close collaboration with Mozambique’s **National Administration for Conservation Areas** (ANAC) – hereafter referred to as the “Lead Project Implementors”. It aims to demonstrate how the *Ecosystem-based Adaptation to climate change in Maputo Environmental Protection Area (MEPA): Conserving and Building Resilience* project (hereafter referred to as “the Project”) will address all comments, suggestions, questions, and complaints that project stakeholders may have about the Project and its activities. The Grievance Mechanism has been developed in alignment with international good practice, including the BAF’s Environmental and Social Management System (ESMS) requirements and the World Bank’s Environmental and Social Standards (ESS) – notably ESS10, and complies with Mozambican requirements as well as the internal Lead Project Implementor’s policies and procedures. Details on the Project description, social context and legislative framework can be found in the first two sections of the Environmental and Social Management Plan (ESMP).

This document meets BAF’s requirements, which requires Projects to have established a provisional Grievance Mechanism, including completion of any necessary pre-cursory assessments and consultations to understand customary and other grievance management mechanisms with Project Affected People (PAP), upon submission of a full proposal. The scope, scale and type of this Grievance Mechanism is proportionate to the nature and scale of the potential risks and impacts of the Project – as screened and independently assessed. This version of the Grievance Mechanism is a final draft, developed as part of the full Project proposal stage, and will be finalised and implemented during the first three months of Project implementation, as illustrated in Table 1.

Table 1: Blue Action Fund requirements for Grievance Management (Blue Action Fund E&S Safeguarding Principles and Requirements, ESMS Manual Annex B).

Blue Action Fund requirements	Project design		Project implementation		
	Concept note stage	Proposal stage	Inception Phase	Annual (or end of Year 1)	Project closing phase
Provisional Grievance Mechanism [Criterion 9.1]	N/A	Required.	N/A	N/A	N/A
Established Grievance Mechanism [Criterion 9.2]	N/A	N/A	Required: within 3 months	Required	Required
Grievance Mechanism Implementation ¹ [Criterion 9.3].	N/A	N/A	Na.	Required	Required

A grievance is considered to be any complaint, comment, question, concern, suggestion about the way a project is being implemented. It may take the form of specific complaints about impacts, damages or harm caused by the project, non-conformity with the BAF, Lead Project Implementor safeguards, concerns about access to the project stakeholder engagement process or about how comments and concerns about project activities, or perceived incidents or impacts, have been addressed.

For this Project, the main Project components are improved resilience through:

- Increased protection and management
- Enhanced livelihood opportunities
- Improved resources, instruments, and capacities for Park management
- Improving infrastructure and the built environment of the Protected Area
- Strengthened adaptive capacity and reduced exposure to climate risks

¹ As the Grievance Mechanism has already been established, implementation refers to the use, responsiveness and monitoring of the Grievance Mechanism.

- Rehabilitation of degraded coastal ecosystems
- Enhanced knowledge, expertise, and capacity of relevant agencies to use EbA approaches for climate-resilient coastal zone management.

As such, grievances that may arise could include those pertaining to exclusion/perceived exclusion in project activities, conflicts between local communities and law enforcement, access restriction, livelihood related issues, Human Wildlife Conflict, sexual exploitation or abuse by staff and local leaders, fraud, and bribing, etc.

The structure of the Grievance Mechanism is as follows:

- Introduction and Purpose of the Grievance Mechanism (this section)
- Eligibility Criteria (Section 2)
- Grievance Procedures (Section 3)
- Informing Stakeholders about the Grievance System (Section 4)
- Serious Incident Reporting (Section 5)
- Maintaining Records and Monitoring Actions (Section 6)

1.1. Purpose of the Grievance Mechanism

A Grievance Mechanism is a free, open, and accessible mechanism, principally designed for PAP, and accessible to all project stakeholders, project staff (including contractors and their workers). It is part of a suite of safeguard instruments that accompany the Project's ESMP. The ESMP outlines the environmental and social management commitments that the Lead Project Implementors will implement to manage potential negative impacts and enhance potential positive impacts of the project.

The Grievance Mechanism helps the Lead Project Implementors understand whether there is a potential breach of the BAF's ESMS principles, standards and procedures and commitments set out in the ESMP. If the grievance submitted is determined to be eligible (Section 2), a process is then followed to identify the root cause of the grievance and ensure that issues of non-compliance with the ESMS are rectified. Some grievance cases may require remedial actions to redress potential harm resulting from failure to respect the ESMS provisions or preventative measures to avoid repetition of non-compliance.

The aim of the grievance mechanism is to provide interested and affected parties suffering adverse impacts from a project with the assurance that they have a voice, that they will be heard and assisted in an organised and timely manner. The Project Grievance System (PGS) will facilitate resolving complaints and grievances in a timely, efficient, and effective manner that satisfies all parties involved. Specifically, it will provide a transparent and credible process and will aim to produce outcomes that are fair, effective, and lasting.

Specifically, this Grievance Mechanism aims to:

- Guide Lead Project Implementors in addressing complaints comments, questions, concerns, and suggestions from PAP and other rightsholders and stakeholders, related to the project and its activities in a fair and transparent, and practical manner.
- Identify and manage stakeholder concerns and thus support effective risk management for the project.
- Provide stakeholders fearing or suffering adverse impacts from the project with the assurance that they will be heard and assisted in a timely manner.
- Build and maintain trust with all stakeholders thereby creating an enabling environment in which to operate.
- Prevent adverse consequences of failure to adequately address grievances.

As such, the Grievance Mechanism does not intend to substitute for any existing grievance procedures (such as those developed in the past by ANAC through World Bank funded projects), but instead

complement and build on existing procedures, while ensuring that the Lead Project Implementors can identify, register (see Section 6 and Annex C.2 Grievance Register²) and respond to grievances appropriately. The key objective is to strengthen existing communication channels, including a dispute resolution mechanism between communities, Park and Project staff. This Grievance Mechanism reflects and operates under the good practice principles illustrated in Figure 1 below and will be integrated into Park and Project governance systems, such as the Project Steering and the Compliance & Risk Committees, to ensure that all project related issues and grievances are addressed and resolved in a timeous manner.

Figure 1: Good practice of the ESMS Grievance Mechanism (Source: IUCN 2020a).



2. Eligibility Criteria

Lead Project Implementors have established the eligibility criteria for the Grievance Mechanism. However, during the first three months of the Project, eligibility criteria will be finalised. In this version of the Grievance Mechanism, criteria of eligible grievances include:

- Any community, organisation, project stakeholder or affected group (including individuals) who believe it is or may be negatively affected by any project activities implemented by Lead Project Implementors, and/or owing to the project's failure to follow the BAF and Lead Project Implementors' Environmental and Social Safeguards and other compliances as set out in the ESMS, during the design or implementation of the Project activity is considered a "Project Affected Party" and is entitled to submit a complaint;
- Negative impacts can include all forms of project impact, including direct and indirect impacts of project activities. As with the scope of application of the BAF ESMS, negative effects are not restricted to the activities of the Lead Project Implementors, but include the effects of activities of

² Because of local and international privacy laws, this Register cannot be freely shared and may only be made available based on formal consent to information procedures.

project partners³ (including collaborating project partners such as Protected Area authorities) that are financially or technically supported by the project Lead Project Implementors;

- Any Project Affected Party may file a complaint;
- Representatives (a person or local organisation) can submit a complaint on behalf of a Project Affected Party, but they must provide concrete evidence of authority to represent them; and
- Anonymous complaints will be considered.

On the other hand, the current criteria for ineligible grievances include:

- Complaints with respect to actions or omissions that are not technically or financially supported by the Project, or about parties that are not partners or collaborating partners in the Project;
- Complaints about issues outside of the Project scope, including outside of the Project Area of Influence;
- Complaints filed:
 - After the date of official closure of the project; or
 - 18 Months after the date of the official closure of the Project in cases where the complaint addresses an impact resulting from project activities that was not, and reasonably could not have been, known prior to the date of official closure.
- Complaints that relate to the laws, policies, and regulations of Mozambique, unless this directly relates to Lead Project Implementors obligation to comply with the Project's ESMS principles, standards and procedures;
- Complaints that relate to the Lead Project Implementors non-project-related housekeeping matters, such as finance, human resources, and administration; and
- Complaints submitted by the same claimant on matters they submitted to the Grievance Mechanism earlier, unless new evidence is provided, or the Project has not responded to this complaint in the timeframe illustrated below (Section 3).

Each grievance will be reviewed by Project's Compliance/Risk Committee in order to determine if it is eligible or ineligible (based on the above outlined criteria). If the complaint is not eligible, the committee will inform the complainants stating the reason for ineligibility and this will be documented (See Annex C.2 Grievance Register).

Project staff and contractors:

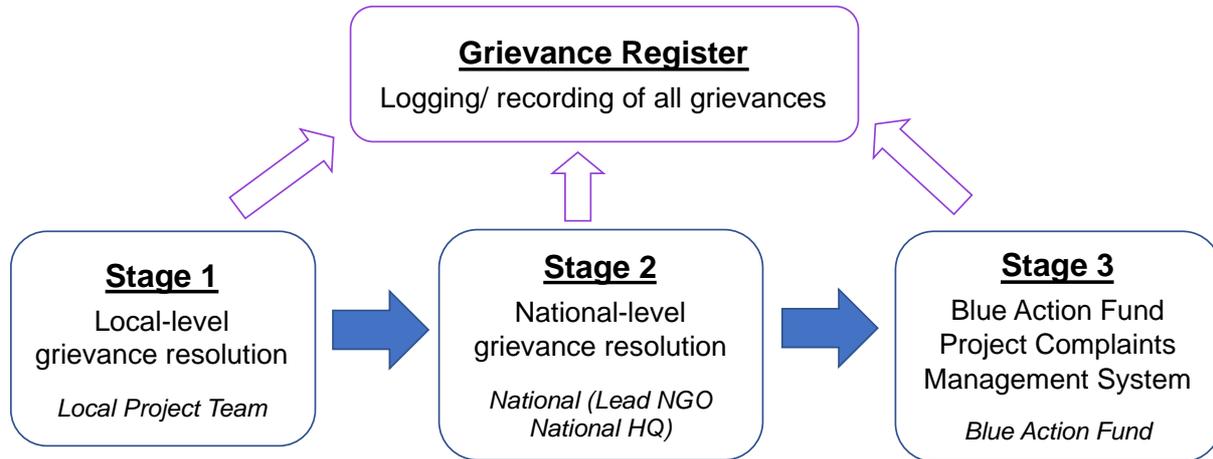
In addition to Project Affected Parties, this Grievance Mechanism will be available for project staff, including contractors and volunteers working in key positions. Lead Project Implementors will ensure that its contractor(s) use the required Grievance Mechanism – this will be included in all contracts and agreements that Lead Project Implementors enter into with contractor(s). All workers will be informed of the grievance procedures and new workers will be informed when they join the project. Information on contact points will be posted on staff information boards and on-site information boards. Alternatively, the Grievance Mechanism of the Lead Project Implementors can be made available to the contractor's workers.

³ Note that in these cases, where the Project cannot effectively respond to a grievance because it is related to a government partner, and it is outside of the lead NGOs mandate to respond to such grievances, the grievance can be registered (see Annex F.2 Grievance Register), and the government partner informed of the nature of the grievance. The affected party would be informed of the mandate of the lead NGO and directed towards the appropriate channels to report the grievance to the government partner. How this works in practice varies considerably. Projects should consider this eventuality when planning activities, particularly in projects with law enforcement and access restrictions, and encourage and support partners to establish or improve Grievance Mechanisms where this is the case.

3. Grievance Procedures

The grievance resolution procedure for the Project comprises the following three (3) stages, as described in the next sections. In order to be practical and cost-effective, resolution of complaints will be sought at the lowest possible level. This procedure aims to address stakeholder concerns promptly, effectively, and transparently.

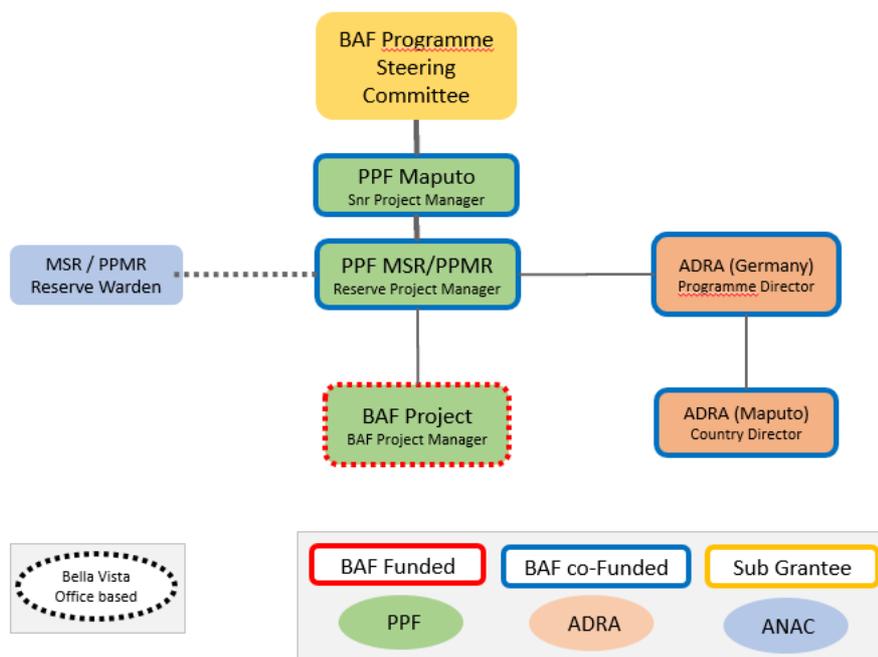
Figure 2: Illustration of the three-stage grievance procedure



During the inception phase of the project, and under the ambit of the conservation sector and relative legislations, the consortium will establish a Steering Committee that will be supported by an Advisory Committee. The Steering Committee will provide strategic leadership and governance oversight and will not be engaged in the daily management of operations. The function of the Steering Committee is to take responsibility for the strategic issues associated with the various phases of the project. The Steering Committee is responsible for approving budgets, approving scope and schedule changes, and monitoring risks, quality, and timeliness. The Project Steering Committee is also expected to make key policy decisions and ensure effective oversight through receiving regular reports and reviewing the results of project monitoring and evaluations.

The **Steering Committee** will have quarterly meetings to discuss the project progress. More specifically, the Steering Committee will:

- Ensure that all interventions under the project are in line with the project objectives.
- Discuss any unexpected issues that arise in the due course of the project implementation which were not agreed upon upfront.
- Monitor the implementation of the project ensuring that any strategic changes are undertaken in a timely manner so that the project achieves its goals.
- Identify and provide advice on opportunities for scale up interventions and collaborations.
- Support the visibility of the project.
- Decide on all issues regarding the communication on the project, including level 3 grievances, and the publishing of data in reports, statements, publications, and other materials.



The function of the **Project Advisory Committee** is to assist the project team and the Steering Committee with the implementation of the project. The Project Advisory Committee will deal with operational issues including Level 1 grievances. The Advisory Committee will ideally consist of representatives from the following stakeholders:

- ANAC Park Representative
- Peace Parks Foundation Representative
- ADRA Representative
- BAF Project Manager
- BAF Project M&E/Compliance Officer
- Consortium implementation partner representatives from:
 - Livaningo
 - AMA
 - CTV
 - UEM
- 4 community representatives from the four administrative posts to be indicated by the communities themselves (Machangulo, Zitundo, Messevene and Inhaca)
- Local district government representatives
- EPA Representative

A **Compliance/Risk Committee** will oversee all ESMS and subsequently Grievance Mechanism and/or Process Framework related risks/impacts, as identified through the ESA and mitigated through the ESMP. This committee consists of senior Lead Implementation Partner staff who are independent from direct project implementation and will be guided by international best practice risk management standards.



3.1. Level/Stage 1 (Low Risk): Local-level resolution sought

The first and preferred approach to resolving grievances involve the Lead Project Implementors' Risk/Compliance Committee reviewing the conflict with the Project Affected Party and deciding together on a way forward that advances their mutual interests. This reflects the fact that local and country authorities often have better information on and understanding of the causes of disputes arising from project implementation. 'Deciding together' approaches are usually the most accessible, natural, unthreatening, and cost-effective ways for communities and project management to resolve differences.

Grievance Procedures

The Grievance Register records the entire grievance procedure and is kept up to date by the Project's M&E/Compliance Officer. Note that the procedures below will be adapted to every complaint's specific context and that the procedures below will be utilised as guiding principles.

1) Submission of a Grievance / Entry Point:

- a) The Project will seek to *provide a safe environment through which all Project stakeholders can voice a concern or lodge a complaint*, without fear of reprisal or unfair treatment and to ensure that complaints are addressed fairly, appropriately, and in a timely manner. Project Affected Parties, including project staff, should be able to lodge a grievance:
 - without any risk of losing their employment, entitlements or suffering any form of retribution in the community or workplace;
 - knowing that harassment or victimisation will not arise from raising a genuine concern; and
 - knowing that complaints will be addressed in a confidential manner.
- b) The Project will identify *one Contact Person in each project village* to act as a conduit for any grievances from groups or individuals who do not feel confident to raise the complaint directly. This person may or may not be directly involved in project implementation and will be made known to the community. Ideal candidates are respected individuals such as religious leaders, teachers, or village elders. Women will be encouraged to stand as the Contact Persons. Where possible they will be selected by open vote during the project inception stage.
- c) Alternatively, in cases where the *Contact Person is unavailable or a party falls in a different stakeholder group*, the following additional methods shall be made available to submit a grievance:
 - Verbally (in person or via telephone) via the Project hotline or to a member of Project staff;
 - E-mail to the grievance e-mail address to the Project field office;
 - Whatsapp messages;
 - Social media (Facebook);
 - Filling out the Grievance Form online; and
 - In writing via the Grievance Boxes.

The Project will *share information about the relevant Grievance Mechanism Contact Persons and complaints channels* during the project inception phase via marketing material in relevant languages, as well as signage in Project villages and Project sites.

- d) When submitting a grievance, the *complaint will be captured on a Grievance Form by the Project M&E/Compliance Officer, and must include the following information* (responsible Contact Persons and/or Project field staff who support complainants in submitting verbal complaints must still ensure that all of the relevant information is captured):
 - Complainant's name and all contact information;

- If not filed directly by the complainant, proof that those representing the affected people have authority to do so;
 - The specific project or program of concern including location;
 - The harm that is or may be resulting from it;
 - The relevant social policy or provision (if known);
 - Any other relevant information or documents (e.g., date of event);
 - Any actions taken so far (if any) to resolve the problem;
 - Proposed solution; and
 - Whether confidentiality is requested (stating reason).
- e) The complaint can be filed either in *English or any of the local languages* (Portuguese or Changa). If the grievance has not been submitted anonymously, and regardless as to whether confidentiality is requested, the identity of the complainant(s) will only be known by the *Project's M&E/Compliance Officer and Committee* in addition to the Contact Person/Field staff member who assisted with the case. When working toward resolving the case, the identity of the complainants will be maintained within as smaller group as possible to assure protection against retaliation.
- f) Once a grievance has been logged, the *Project's M&E/Compliance Officer* will inform the *Compliance/Risk Committee* of the complaint, and the grievance will be recorded and classified in Annex C.2 Grievance Register within *five (5) working days*. This register will be maintained in a location accessible only to the responsible staff members, and not shared with outside parties⁴.

2) Acknowledgement of and addressing the grievance:

- a) The Grievance will be *formally acknowledged* by the Project's M&E/Compliance Officer through a personal meeting with relevant staff or phone call, and additionally confirmed by email or letter as appropriate, *within five (5) working days* of submission. If the grievance is not well understood or if additional information is required, the Project's M&E/Compliance Officer will seek clarification from the complainant during this step.
- b) The *Compliance/Risk Committee* will investigate the validity of the grievance, including whether it is related to a contractor within *ten (10) working days of receiving the complaint*. The root cause will be investigated, and the risk category identified (i.e., the risk that the grievance poses to the PAP and to the Project will be ranked as high, medium, or low). The Committee will then refer the grievance to an appropriate Project staff member – likely the Project's M&E/Compliance Officer.
- c) Based on the initial assessment, findings, and proposed actions to be taken identified by the Compliance/Risk Committee, the *M&E/Compliance Officer (or whomever the Committee identifies as the Grievance Respondent)* will then draft a response for approval. The Project's Compliance/Risk Committee will consider the use of existing/locally relevant conflict resolution mechanisms, which will be identified during the Project's inception stage and pre-cursory consultations with communities. These mechanisms may include i) working with previously approved customary mechanisms between PAPs and the Park (including any customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities) or ii) establishing a project conflict resolution "committee" for the management of complex grievance issues. This committee can include project staff, local authorities, and traditional leaders/community representatives. These mechanisms will be identified and finalised during the Project inception stage.
- d) Required actions implemented to deal with the issue, and completion of these, are recorded in Annex C.2 Grievance Register.

⁴ In some cases, sharing the Grievance Register with an outside party can be required. For example, in the case of Blue Action Fund project evaluation. In these cases, personal information will first be redacted from the register, and the terms of the sharing and use clearly stated.

- e) The *drafted Grievance Response is signed-off by the Compliance/Risk Committee Chairperson* within fifteen (15) working days of receiving the complaint. The sign-off will be a signature in Annex C.2 Grievance Register, and on the response correspondence (a copy of which will be filed with the initial grievance form).
- f) The response to the complainant will be carefully coordinated – as prescribed by the Compliance/Risk Committee. The responsible staff member will *ensure that a suitable approach to communicating the response to the affected party is agreed and subsequently implemented. The response to a grievance will be provided within twenty (20) working days* of receipt of the grievance.
- g) The *response of the complainant is recorded in Annex C.2 Grievance Register* by the Project M&E/Compliance Officer to help assess whether the grievance is closed or whether further action is needed. The Compliance/Risk Committee will use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. Ideally, both parties should sign off the grievance to confirm closure. Or, alternatively, a written confirmation that the grievance has been closed satisfactorily should be obtained and filed with the original complaint.
- h) The *grievance is closed with sign-off from the Compliance/Risks Committee* who determines whether the grievance is closed or whether further attention and action is required. If further attention is required, the Committee will restart steps from 2. Acknowledgement of and addressing a grievance to re-assess the grievance and then take appropriate action. Once the Committee has assessed whether the grievance can be closed, the Chairperson will sign off to approve closure of the grievance in Annex C.2 Grievance Register or via formal written communication to the M&E/Compliance Officer who will sign-off the Register.
- i) Should the matter become public, the Peace Parks Directorate, with input from the project's Compliance/Risk Committee, shall issue a public statement about the procedures followed and the status of the grievance, and/or the outcome of the complaint review. ADRA Germany and Peace Parks will follow their respective internal processes for notifying stakeholders as to any grievances.

3.2. Level/Stage 2 (Medium Risk): National Level Grievance Resolution

- a) Where the response of any grievance through Stage 1 is considered unsatisfactory to the aggrieved party, a complainant can raise a grievance directly with the Park Warden at Maputo National Park, Peace Parks Foundation's Maputo Office, or ADRA Germany's Maputo Office, instead of using the available Grievance Mechanism channels. These Lead Project Implementors will then direct the complaint received to the M&E/Compliance Officer (within five working days) who will inform the Project's Compliance/Risk Committee and in turn escalate the grievance to the Project Steering Committee.
- b) Alternatively, where a Level/Stage 1 complaint was assessed by the Project Risk/Compliance Committee as a medium risk, the complaint will automatically be escalated to the Project Steering Committee.
- c) The Project Steering Committee will assess the grievance and instruct a dedicated Grievance Task Team on a plan and timeframe to investigate the complaint, which will be communicated to the complainant as per the grievance procedures outlined above.
- d) The Grievance Task Team will investigate the grievance, with additional technical support if required (e.g., from Peace Parks or ADRA Germany's Head Offices, or an independent third party). Based on the findings, the Task Team will work with the concerned parties, in collaboration with the Compliance/Risk Committee, to develop and implement an action plan and timeframe to resolve any grievance related issues.

- e) A summary of the concern raised, actions taken, conclusions reached, the follow-up plan and timeframe for completion will be documented (in Annex C.2 Grievance Register) and communicated as agreed between the parties. The Lead Project Implementors' senior project management team will facilitate support to further clarify, assess, and resolve further issues, as needed.

3.3. Level/Stage 3 (High Risk): Blue Action Fund's Project Complaints Management System

- a) In cases where a complainant feels that issue is not being properly addressed by the Project Implementors/Consortium partners, a stakeholder can directly submit a grievance to the Blue Action Fund via its Project Complaints Management System. Blue Action Fund maintains a separate channel of communication open to all Project stakeholders in the event that issues are not being properly addressed by the Project Implementors. Blue Action's own institutional Grievance Mechanism is located on the Blue Action Fund website ([here](#)).
- b) Alternatively, in the event of serious incident, a "high risk" complaint, or complex grievances that cannot be resolved promptly, the Lead Project Implementors, through its Project Risk/Compliance Committee, are obligated to inform BAF of the relevant case.
- c) The Project Risk/Compliance and/or Steering Committee may request/propose formal mediation services as an option where Project Affected Parties are not satisfied with the proposed resolution. Ultimately though, Project Affected Parties may turn to a Court of Law in accordance with the existing legislation of Mozambique, and in that case, this grievance procedure may not impede access to other judicial or administrative remedies that are available under relevant Laws.
- d) These high level or escalated risks will be received, assessed, and addressed by Peace Parks Mozambique and ADRA Germany's Senior Project staff in collaboration with relevant Directorates and BAF's Complaints Management department.

4. Informing Stakeholders about the Grievance System

For the Grievance Mechanism to be effective and accessible, the Lead Project Implementors will take active steps to inform all relevant project stakeholders of the existence and scope of the Grievance Mechanism and about the relevant provisions of the ESMP. It is vital that stakeholders are aware of the eligibility criteria for a grievance and the mechanism for grievance submission. This will be accomplished through stakeholder engagement during the project inception stage (first three months after project launch).

The Lead Project Implementors will align the Grievance Mechanism procedures with good international practice, meaning it will be:

- **Accessible:** All field offices and field staff will have information on the Grievance Mechanism and how to register complaints; all stakeholders will have information on the Grievance Mechanism and how to register complaints;
- **Practical:** The mechanism established ensures that it is simple and viable and does not create a burden for project implementors or project stakeholders;
- **Transparent:** Decisions will be taken in a fair and transparent manner and the complainants will be kept updated of the process;
- **Independent:** The oversight body (Project Compliance/Risk Committee) and designated team (Grievance Task Team) will be independent from project management where the grievance/complaint originates; and
- **Time Bound:** The process for resolution will be comprehensive and completed in a timely manner – ideally within 20 working days of receipt of complaint.

This will be ensured by translating the Grievance Mechanism into relevant local languages, including Portuguese and Changana, and ensuring that the information is delivered in a culturally appropriate way reaching all relevant stakeholder groups, including women, and vulnerable groups. Various methods will be used to raise awareness about the Grievance Mechanism and procedures including

verbal communication (e.g., through consultation meetings, trainings, project website as well at local offices in the project area). In addition, grievance boxes will be placed at meetings and in training sessions. As noted in the Grievance Procedure above, grievances can be submitted in any of the local languages verbally or in written form.

Accessibility also requires that complaint submission, handling and recording is designed in such way that stakeholders have confidence in the mechanism and that procedures are in place to protect complainants from any form of retaliatory action, including provisions for disciplinary or other appropriate action in case of violations of this principle. The Lead Project Implementors will ensure that all stakeholders are aware of this. The Project additionally requires that all staff, contractors, consultants, and responsible stakeholders who are active in project implementation must sign a Project Code of Conduct, and take note of the Project's ESMP safeguard requirements, which includes this Grievance Mechanism.

5. Serious Incident Reporting

The Lead Project Implementors shall report all serious incidents caused by or related to the Project that have or could have significant negative impacts on people or on the environment, to BAF. Additionally, due to the risks of association, serious incidents that relate to collaborating partners that the Project technically or financially supports, shall also be reported, if they occur in the project area, even if they are not directly related to a project activity.

The purpose of reporting serious incidents is to ensure that appropriate responses and corrective actions are taken in a timely manner in order to minimise, mitigate and/or remedy the impacts as well as to avoid repeat occurrences. A serious incident in this context is defined as: *“any unplanned or uncontrolled event with a materially adverse effect on workers, community members or the environment within the project's Area of Influence or events that have the potential to have material or immaterial adverse effects on the project execution or give rise to potential liabilities or reputational risks”* (IUCN 2020b, Reporting Serious Incidents).

Serious incidents can include, for example:

- Fatalities, serious injuries and accidents at work;
- Fatalities, serious injuries and accidents affecting local communities and others;
- Violations of human rights, including sexual and gender-based violence and harmful child labour;
- Forced evictions;
- Conflicts, disputes and disturbances leading to loss of life, violence or the risk of violence; and
- Environmental impacts.

In the case of a serious incident, the incident will be reported by the Project's Compliance/Risk Committee to the relevant BAF Programme Manager and the BAF ESMS Coordinator within 48 hours of the Lead Project Implementors receiving information of the incident occurring. In cases where detailed information is not immediately available, a draft report will be prepared by the Lead Project Implementors and submitted, with a more comprehensive update being prepared once the details have been established. The report will state whether the incident will be subject to a formal inquiry, criminal investigation or legal proceedings to determine the circumstances of the incident, responsibilities and root causes.

If the incident is not subject to a formal inquiry or legal proceedings, the report will follow the template provided in Annex F.4 Serious Incident Report), including:

- A detailed description of the incident and its effects on workers, local communities, the environment etc.;
- An analysis of the root-causes, covering the management and control measures that were in place at the time and any failings identified in regard to management or procedures; and

- Details of any response provided, actions taken to remedy the situation, and to prevent its recurrence.

If the incident is subject to a formal inquiry or legal procedure, the findings of the inquiry will be summarised, using the template in Annex F.4 Serious Incident Report, along with a link to and/or an electronic copy of the inquiry's final report, if it is made available to the public. The Lead Project Implementors will inform BAF about any ongoing or future issues related to the incident that may require attention, such as grievances, claims for compensation or other legal action taken by the victims' families.

6. Maintaining Records and Monitoring Actions

All grievances, whether eligible or not, must be recorded in a Grievance Register (Annex C.2 Grievance Register). This register documents all complaints, suggestions, comments, and/or questions submitted by stakeholders in a categorical way under five main headings:

- Grievance registration: Including subject of complaint, description of complaint and eligibility criteria;
- Acknowledgement: The Project Compliance/Risk Committee, via the M&E/Compliance Officer acknowledges receipt of the grievance within five (5) working days;
- Investigation (of eligible grievances only): The Project Compliance/Risk Committee investigates the root cause, whether the claim is true or false and proposes corrective actions;
- Response: The Compliance/Risk Committee provides a response to the complainant within 20 working days; and
- Close out: The Compliance/Risk Committee closes the grievance once it has been adequately addressed and remedied and a response provided to the complainant.

Agreed action plans will establish timeframes for regular process monitoring towards resolution of the grievance. The Project Compliance/Risk Committee will coordinate the monitoring of grievances by organising periodic checks, bringing together the concerned parties and relevant technical advisors for meetings or other communication on the status of action plans, until they are completed. The Project Steering Committee will assess the effectiveness of this complaint's resolution process on an annual basis and identify any needs for improvement.

The Grievance Mechanism and accompanying Annex C.2 Grievance Register will be maintained, saved in a secure place, and updated regularly by the Project's M&E/Compliance Officer. The indicators that will be used to monitor and evaluate the effectiveness of a Project's Grievance Mechanism are listed below, and will be monitored through the assessment of the Grievance Register and serious incident forms:

- Number of grievances received and recorded (disaggregated by eligible and ineligible) during the reporting/ review period;
- Number of grievances acknowledged on time/not acknowledged on time, including why;
- Number of grievances where the investigation was/was not completed on time, including why;
- Number of grievances resolved and unresolved.
- Number of serious incidents;
- Number of serious incidents still open (inquiry or corrective actions on-going) and closed.

Annex C.2: Grievance Register:

PLEASE NOTE: The Grievance Register contains private and confidential information and may only be released following formal consent processes by the Compliance/Risk Committee and therefore not attached to this preliminary Grievance Mechanism for public disclosure purposes.

Annex C.3: Template for Public Grievance Form

The Grievance Form will be translated into Portuguese and Changana

Public Grievance Form	
Reference No. (assigned by M&E/Compliance Officer):	
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 considered.	
Full Name	
Anonymous submission	<input type="checkbox"/> I want to remain anonymous
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By mail (please provide mailing address): _____
	<input type="checkbox"/> By telephone (please provide telephone number): _____
	<input type="checkbox"/> By e-mail (please provide e-mail address): _____
Preferred language for communication	<input type="checkbox"/> [insert other applicable language(s)] <input type="checkbox"/> English <input type="checkbox"/> Other, please specify: _____
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: _____	<input type="checkbox"/> One time incident/ grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return grievance form to:
The M&E/Compliance Officer
Maputo National Park Head Office
Email: (to be confirmed during Project Inception Stage)
Contact No.: (to be confirmed during Project Inception Stage)

Annex C.4: Template for a Serious Incident Report

Source: IUCN 2020b

Serious Incident Report	
General Information	
Project name, country, region	
Executing Agency	
Person and agency submitting the information	
Organisations, agencies and/or companies involved in the incident	
Details of the people affected, status (e.g., if they are working as rangers, volunteers, etc.), names, ages, gender. Details of the community or communities involved	
Details of the Incident	
Date and time the Incident occurred	
Location	
Type of Incident	Fatalities, serious injuries and accidents at work <input type="checkbox"/>
	Fatalities, serious injuries and accidents affecting local communities and others <input type="checkbox"/>
	Violations of human rights or accusation of human rights violations, incl. sexual and gender-based violence and harmful child labour <input type="checkbox"/>
	Forced Eviction <input type="checkbox"/>
	Conflicts, disputes and disturbances leading to loss of life, violence or the risk of violence <input type="checkbox"/>
	Environmental incidents <input type="checkbox"/>
Detailed chronological description of the Incident and its circumstances (if possible, with photos)	
Root Cause Analysis	
Detailed description of key causal factors (internal and external), potential management failings and identification of absent/ inadequate/ failed/ unused management and control measures	



Serious Incident Report			
(e.g., non-compliances with ESMS standards or measures)			
Specification of relevant roles and responsibilities of the agencies, authorities and others involved			
Reaction to the incidents by the victims, involved families or communities as well as local/ national/ international media			
Agency or agencies responsible for investigation of the case. What is the scope of the investigation? Does this include a root cause analysis?			
Response and Corrective Actions			
Description of the response (if available) and agencies involved			
Description of any corrective actions, plans or next steps to prevent the incident from recurring or follow up to close the case or proceed with further investigations (include action plan with responsibilities and schedule)			
Incident Report Approval			
	Name	Signature	Date
Prepared by: (Position)			
Approved by Compliance & Risk Committee Chairperson			
Approved by Senior Project Manager Peace Parks Foundation			
Approved by Country Director ADRA Germany			
Approved by Blue Action Fund (when necessary)			