Blue Nature Alliance
Accountability and Grievance Mechanism (AGM) Manual

I. Acronyms & Definitions

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<tr>
<th>AGM</th>
<th>Accountability and Grievance Mechanism</th>
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<tr>
<td>CI</td>
<td>Conservation International</td>
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<td>GEF</td>
<td>Global Environment Facility</td>
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<tr>
<td>AGMC</td>
<td>Accountability and Grievance Mechanism Committee</td>
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Complaint is a statement that a situation is unsatisfactory or unacceptable.
Grievance is a wrong or other cause for complaint or protest such as unfair treatment.
Complainant is the party that makes a complaint.
Aggrieved party is any person whose financial, personal, or property rights or interests are adversely affected by an act of another or an order, judgment or statute.

II. Purpose

Accountability and Grievance Mechanism (AGM) Operations Manual
This AGM Operations Manual outlines the process and procedures to successfully operationalize the Blue Nature Alliance’s two-tiered AGM. This document provides specific guidance on the collection, recording, processing, and resolving of grievances at both the site-level and the broader Alliance level. The policies and procedures outlined in this document include the use of best practices to
• address breaches of policy and procedure;
• to be independent, transparent and effective;
• to be accessible to project-affected people;
• to maintain records on all cases with due regard to confidentiality of complainants’ identity and information; and
• to take appropriate measures to minimize risk of retaliation to complainants.

Site-Level AGM
The purpose of the site-level AGM is to provide project stakeholders with an effective and efficient process for expressing and resolving concerns and complaints. This transparent and accessible process promotes a mutually constructive relationship with partners and stakeholders and reduces the overall risk to the project.
Alliance AGM
The purpose of the Alliance AGM is to mediate and resolve grievances that are unable to be resolved at the site-level. The Alliance AGM is also designed to address high-risk concerns and complaints, such as those that include conflict, fraud or corruption. The Alliance AGM is managed by a neutral party and is empowered to undertake the necessary steps to protect against conflict of interest and maintains the highest standards for transparency.

III. Site-Level AGM

Responsible Persons and Bodies

Accountability and Grievance Mechanism Committee (AGMC)
The AGMC is comprised of select site-level directors and managers with representation from all implementing and partner agencies within a particular site. This body is responsible to
• oversee the running of the AGM under its designated purpose;
• monitor the implementation of decisions and resolutions;
• undertake fact-finding activities when necessary; and
• facilitate dialogue and mediation.

Coordinator
The Coordinator is responsible for day-to-day management of the AGM process, which includes
• receiving, logging, and storing complaints in paper form as well as in an electronic database;
• reviewing, processing, and acknowledging complaints when they are received;
• assessing and categorizing complaints based on their substance;
• assigning suitable persons to conduct any information gathering and/or to develop appropriate responses to complaints;
• following up with the complainant to inform them of the status of their complaint, what the steps are in the process of addressing the complaint and when they will next be updated;
• reporting and coordinating with the AGMC and the Blue Nature Alliance Safeguards Advisor on the processing of all complaints received.

Alliance Safeguards Advisor
The Alliance Safeguards Advisor is responsible for supporting the Coordinator to ensure that the site-level grievance mechanism operates as intended to provide a transparent and open process to resolve grievances. This includes
• conducting the eligibility screening and assessment of grievances;
• supporting the Coordinator to keep complainants informed of the grievance process;
• providing any support or guidance to the Coordinator and/or Committee; and
• Communicating with the Alliance level mechanism to ensure that any sensitive grievances are elevated appropriately.

Blue Nature Alliance Staff and Implementing Partners
Blue Nature Alliance Staff and implementing partners working on the ground in a project site are responsible to
• liaise with local point persons to collect any paper grievance submission forms;
• logging face-to-face grievances within the AGM database;
• receive grievances and immediately record them using site specific forms and procedures; and
• posting Alliance AGM products and materials in appropriate online and physical forums accessible to all stakeholders.
• Disclosing the AGM to key stakeholders in a manner, language and format that suits local context

Local Point Persons
Local Point Persons are chosen based on the preferences of local communities and stakeholder groups and are responsible to receive grievances on behalf of the project site and are expect to
• receive and/or complete the grievance submission forms on behalf of complainants’;
and
• store, send and/or transport grievance submission forms to the Coordinator per the site-specific procedures.

Process

1. Submit a Grievance
The aggrieved party must submit a grievance to Local Point Persons, staff from the Blue Nature Alliance or Implementing Partners, or through the online system. The submission of grievances should include the following information:
• name, designation, address and contact information;
• if a complaint is made through a representative, the name/s of the person/s on whose behalf the complaint is made;
• whether the aggrieved party chooses to keep their identify confidential;
• a description of the grievance including location and data/time of its occurrence; and
• a brief description of the impacts of the occurrence.

Grievances can be submitted in-person, electronically, or in written form and submitted per the site-specific contact channels (email address, address, phone number, or designated persons).
2. Receive and Log Grievance

Only staff from the Blue Nature Alliance and Implementing Partners as well as designated Local Point Persons are authorized to collect paper grievances. Furthermore, staff should liaise with Local Point Persons on a regular basis to facilitate the timely collection of grievances from the field. Once received, the grievances should be immediately transmitted to the Coordinator and logged in a database and stored per site-specific procedures.

3. Eligibility Screening

After received and logged, the Coordinator will work with the Alliance Safeguards Advisor to screen the grievance to determine if a grievance is eligible for processing through the AGM. Eligibility is determined by the following criteria:

- Is the grievance made in good faith?
- Does the grievance directly relate to the project?
- Are there other organizations that are more appropriate to address the issue?
- Is the grievance submitted by or on behalf of a person or people affected by the project or program?

Grievances that are found to be outside the scope of the AGM will either be directed to other organizations more appropriate to handle the grievance, or, if not, closed out of the AGM. This includes grievances from complainants who provide ineligible or incorrect information.

4. Acknowledge, Assess, Convene & Assign

*Acknowledge*

Within a designated timeframe established under the site-specific procedures the Coordinator or Alliance Safeguards Advisor will contact the complainant using the most suitable method available to let them know that the grievance was received, their reference number assigned through the database, next steps in the process and the point of contact. The Coordinator or Alliance Safeguards Advisor will also verify the contact information for the complainant if necessary and ensure that the basic information required to proceed in the AGM process is provided. If the grievance is ineligible to proceed in the AGM, the Coordinator or Alliance Safeguards Advisor should inform the complainant of the reason for ineligibility and direct them to other organizations more appropriate for the complaint if possible.

*Assess*

Eligible grievances will be assessed based on risk level and category:

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<th>Risk Level</th>
<th>Description</th>
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| 1          | The complaint is straightforward, the issue is clear, and the solution is obvious and resolutions can be developed and provided immediately. This may include cases where the grievance is:  
  • addressed by sharing available information;  
  • addressed by a straightforward decision/action;  
  • already being investigated; or  
  • in the process of being resolved. |
The complaint lacks full necessary information and
- needs to be investigated for further information and may involve engagement with multiple stakeholders; or
- the resolution of the grievance involves action from a particular stakeholder.

Grievances with, or with the potential to have, a significant adverse impact on, and interaction with, stakeholders. These may include:
- repeated grievances;
- clear/strong evidence of (threatened) violence; or
- clear/strong evidence of illegal activity, victimization or corruption, etc.
- Reputational (to CI or donor)

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<th>Categories</th>
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| Environmental     | Grievances related to Blue Nature Alliance or Implementing Partner staff/stakeholders at demonstration sites causing impacts like  
- destruction to surrounding flora or fauna;  
- disruption of waterways, water sources, ground water or other important body of water;  
- air pollution;  
- water pollution;  
- noise pollution; or  
- accumulation of garbage. |
| Non-compliance    | Grievances related to Blue Nature Alliance or Implementing Partner staff/stakeholders refusing to  
- respect indigenous rights, laws or land;  
- use provided personal protective equipment while on site; or  
- obey instructions given from on-site (demonstration site) authority.  
- Violating labor and working conditions?  
- Causing risk to community health, safety and security? |
| Violence (including Gender Based Violence) | Grievances related to  
- clear/strong evidence of persons (male, female, child) abused in any way by Blue Nature Alliance or Implementing Partner staff or stakeholders; or  
- violence as a result of project activities. |
| Discrimination    | Grievances related to persons who were not consulted in implementation of project activities based on gender, ethnicity, etc.                                                                                                                                 |

The results of the assessment of the grievance should be documented and recorded by the Coordinator per site-specific procedures.

Convene & Assign

Following the acknowledgement and assessment of the grievance, the Coordinator will then convene the AGMC within a set timeframe as determined by the site-specific procedures. Based on the risk and category of the grievance, the AGMC will review and assign persons to spearhead the resolution of the grievance and set an appropriate timeframe to develop resolution and present it to the aggrieved party. Depending on the sensitivity of the grievance,
the AGMC may also stipulate how the assigned persons should engage with the relevant stakeholders. Any necessary resources needed to address the grievance will also be allocated.

In the case of high risks and grievances that merit a Risk Level 3 risk categorization, the grievance should be elevated to the Alliance AGM (see Section IV. Alliance AGM).

5. Development of a Response

After the assigned persons are designated by the AGMC to develop a resolution, two potential responses can be considered:

1. direct action based on the available information; or
2. further assessment and information gathering is needed to determine the most appropriate action. This may include
   a. engagement/negotiation with the complainant;
   b. engagement with other stakeholders; or
   c. field visits and fact-finding missions.

Grievance responses, whether direct action or further investigations, should consider the complainant’s views about the desired outcomes or process for grievance resolution. The response may suggest a specific remedy or an approach for how to settle the grievance.

Assigned persons should develop a proposed response to the aggrieved party that includes

- a clear explanation of the response and why it is being proposed; and
- what the complainant’s choices are, given the proposed response. For example:
  o Agreement to proceed
  o Further dialogue on proposed action
  o Participation in proposed assessment and engagement process

The AGMC is responsible for reviewing and approving a proposed response before it is communicated to the aggrieved party. If the AGMC is unable to come to an agreement, the grievance is then elevated to the Alliance AGM.

6. Agreement and Implementation of a Response

The Coordinator or Alliance Safeguards Advisor is responsible for communicating the proposed response to the aggrieved party within the timeframe designated by the AGMC. The aggrieved party can choose to agree or disagree with the proposed response. The response is then recorded and logged in a database by the Coordinator according to site-specific procedures. The AGMC is responsible for monitoring the implementation of decisions and agreements made with the aggrieved party.

*If the aggrieved party agrees* with the proposed response, the AGMC can proceed with the proposed response. In cases, where the proposed response is to initiate investigations or engage stakeholders, a collaborative process may be conducted by a neutral third party as agreed to by both the aggrieved party and the stakeholders in question. This process should clarify

- the issues and events that led to the complaint;
- the stakeholders involved in those issues and events;
• the stakeholders’ views, interests, and concerns;
• whether key stakeholders are willing and able to engage in a joint, collaborative process (which may include joint fact finding, dialogue and/or negotiation) to resolve the issues;
• how the stakeholders will be represented, and what their decision-making authority will be;
• what work plan and timeframe the stakeholders would use to work through the issues; and
• what resources they will need and who will contribute those resources.

Whether or not a collaborative process appears viable, the Coordinator or Alliance Safeguards Advisor will communicate the assessment findings to the complainant and other stakeholders, with a recommendation on how to proceed. A report on the proposed response, and the actions that followed that result will be sent by the AGMC to the involved parties.

*If the aggrieved party disagrees* with the proposed response, the Coordinator will log the disagreement to the response in the AGM database per site-specific procedures and will draft a review of the reasons for disagreement and suggest another approach. This review of the reasons for disagreement and alternative approach should be reviewed and approved by the AGMC within a designated timeframe before being communicated to the aggrieved party.

*If the aggrieved party still disagrees* after reviewing the alternative approach suggested by the Coordinator or Alliance Safeguards Advisor, the aggrieved party will be informed about other alternatives that may be available, including the use of judicial or other alternative mechanisms for recourse.

Other alternatives (after using the AGM) available to the aggrieved party include

• CI Ethics Hotline under the Alliance AGM
• GEF Commissioner
  The aggrieved party must first refer the matter to the Alliance AGM before the grievance may be submitted to the GEF Commissioner. If the aggrieved party is not satisfied with the outcome of the Alliance AGM, the grievance may be submitted to the GEF Commissioner.
• Court of Law
  If the aggrieved party is not satisfied with the outcome from the GEF they can refer the matter to a Court of Law for redress.

7. Grievance Close Out

In the case of a successful resolution from the proposed response from the AGMC, the Coordinator will log into the AGM database and document the satisfactory resolution. In cases where there have been minor risks, impacts and/or negative publicity, written documentation from the aggrieved party including satisfaction with the response will be encouraged.

In cases of an unusual response to the proposed response from the AGMC, the Coordinator will

• document the steps taken;
• document communication with the aggrieved party (and other stakeholders if there has been substantial effort to initiate or complete a multi-stakeholder process); or
• document the decisions made by the AGMC and the aggrieved party about referral or recourse to other alternatives, including legal alternatives.

Monitoring & Transparency

All complaints received will be entered into an electronic database. All grievance submissions processed by the AGM must be entered into this database which will also allow for tracking and documenting of any and all steps taken in the AGM process. This database will also be used by the Blue Nature Alliance to generate analysis of the grievances received, including the number of grievances under investigation or closed out, as well as the geographic distribution of grievances.

Information stored in the AGM database will only be accessible through a login system, with an associated audit trial feature. This feature tracks changes made to the grievance entries, when they were made, and with what login credential. This is meant to deter any attempts to alter illegally any records within the database. A detailed guide to use and manage the AGM database will be made available.

Operational Protocols for the AGM Committee

The AGMC as the highest decision-making body in the Site-Level AGM. All members of the AGMC, which are designated when the AGM is established prior to on-the-ground implementation, must be consulted on all grievances that are deemed eligible by the Alliance Safeguards Advisor. In the event that the AGMC is not in agreement on the handling of a grievance, that grievance is to be elevated to the Alliance AGM.

IV. Alliance AGM

Responsible Persons and Bodies

Alliance Accountability and Grievance Mechanism (AGM) Committee

The Alliance AGM Committee will be comprised of the following
• Select staff from CI and PEW chosen by the Blue Nature Alliance Technical Director
• CI’s Senior Director of Risk Management and Compliance
• Blue Nature Alliance Safeguards Advisor
• Technical expertise to be selected and included on the purview of CI’s Senior Director of Risk Management and Compliance

It is the responsibility of the joint Alliance AGM Committee is to
• review and facilitate the provision of expert guidance on grievances;
• work collaboratively under the management of CI’s Senior Director of Risk Management and Compliance to develop appropriate responses to grievances;
• work collaboratively with the assistance of mediators to reach acceptable agreement with aggrieved parties; and
• oversee the implementation of decisions and fact-finding activities as determined by the Alliance AGM Committee.

CI’s Senior Director of Risk Management and Compliance
It is the responsibility of CI’s Senior Director of Risk Management and Compliance to act as a neutral party and to
• manage the Alliance AGM process;
• determine the eligibility of complaints;
• convene the Alliance AGM Committee including persons with the appropriate expertise to review and address grievances on an ad hoc basis;
• maintain communication with the complainant throughout the process;
• provide expert guidance to resolve and/or escalate grievances; and
• oversee the transparency of the Alliance AGM including the reporting and documenting of the individual grievances as they are processed.

Blue Nature Alliance Safeguards Advisor
The Blue Nature Alliance Safeguards Advisor is responsible to
• provide technical expertise, training and guidance to Alliance staff, Implementing Partners and grantees on an ad hoc basis;
• monitor and report on the functioning of the Alliance AGM system overall including flagging any high-risk situations for review by the Alliance AGM;
• support CI’s Senior Director of Risk Management and Compliance to address and resolve grievances through the Alliance AGM.

Process

1. Referral or Submission of a Grievance
It is expected and advised that the majority of grievances addressed by the Alliance AGM will have already been reviewed and addressed by the Site-Level AGM. Grievances escalate from the Site-Level AGM to the Alliance AGM either because an agreement with the aggrieved party could not be reached or the grievance presents a high level of risk. Grievances should be referred to the Alliance AGM by the designated Site-Level Coordinator in collaboration with the Blue Nature Alliance Safeguards Advisor. The Alliance AGM may accept grievances directly without having been reviewed at the Site-Level if appropriate and at the discretion of CI’s Senior Director of Risk Management and Compliance.

Grievances can be submitted directly to the Alliance AGM through the following contact channels:
Online: https://secure.ethicspoint.com
Electronic email: alliancegrievance@conservation.org
Mailing address: Director of Compliance
Conservation International
2011 Crystal Drive, Suite 500
Arlington, VA 22202, USA.

The submission of grievances should include the following information:

- names, designations, addresses, and contact information of the complainants and their representative(s);
- if a complaint is made through a representative, identification of the project-affected people on whose behalf the complaint is made and evidence of the authority to represent them;
- whether the complainants choose to keep their identities confidential;
- a brief description of the Alliance-funded project with the project name and location;
- an explanation of the complainants’ claim that the alleged direct and material harm is, or will be, caused by the Alliance’s alleged failure to follow its operational policies and procedures during the formulating, processing, or implementing the Alliance-funded project;
- a description of the operational policies and procedures that have not been complied with by the Alliance during the formulating, processing, or implementing the Alliance-funded project;
- a description of the complainants’ good faith efforts to address the problems first with the operations department concerned, and the results of these efforts; and
- a description of the complainants’ efforts to address the problems with the project-level grievance redress mechanisms concerned, and the results of these.

2. Log Grievance

Once received or referred, all grievances must be logged into the NAVEX Ethics Platform.

3. Eligibility Screening

Grievances are screened by CI’s Senior Director of Risk Management and Compliance to determine if a grievance is eligible for processing through the Alliance AGM. Eligibility is determined by the following criteria:

- relates to a project or program in which CI is implementing or executing;
- complainant has informed the Alliance and/or implementing partner of complaint and has worked with them towards identifying a solution by following the conflict resolution framework;
- is submitted by or on behalf of a person or people affected by the project or program; and

- raises potential issues relating to compliance with the Alliance’s Environmental and Social Safeguard Policy, Indigenous Peoples Policy, and Gender Policy.

Grievances that are found to be outside the scope of the Alliance AGM will either be directed to other organizations more appropriate to handle the grievance, or, if not, closed out of the Alliance AGM. This includes grievances from complainants who provide ineligible or incorrect information.

4. Processing the Complaint

Based on determination, the Director of Compliance and Risk Management will either process the complaint or designate a person or panel to conduct a thorough and objective review of grievance as needed. Any designated person or panel will report to the Director of Compliance and Risk Management. This review can include in-country inspections, interviews of project-affected people, and comprehensive information gathering to allow a factual determination of the issues raised and a reliable basis for any recommendations made. The Director of Compliance and Risk Management will issue reports with findings to requesters and all stakeholders involved.

5. Development of a Response

Based on reports, the Alliance AGM Committee will assist parties to engage in resolving the problem. This may include: facilitating a consultative dialogue, promoting information sharing, undertaking joint fact-finding, facilitating establishment of a mediation mechanism, and/or using other approaches to problem solving. Remedial actions involving a change in the project require approval from the Alliance Leadership Team who will then inform the Blue Nature Alliance Steering Council.

Upon completion of processing of the complaint, the Director of Compliance and Risk Management, Alliance AGM Committee or designated person creates a report summarizing the complaint, steps to resolve the issues, the parties’ decisions, and the parties’ agreement, if any. This report will be made available to all parties involved.

The Director of Compliance and Risk Management will monitor implementation of decisions. As part of the monitoring process all parties involved will be consulted and the Director of Compliance and Risk Management will prepare monitoring reports on implementation of remedial actions to be sent to involved parties and submits them to them for information.

Conclusion of the process occurs after monitoring of remedial actions is completed. The Alliance AGM Committee prepares a final report and submits report to all parties involved.

6. Agreement and Implementation of a Response

The aggrieved party can choose to agree or disagree with the proposed response. The response is then recorded and logged in the NAVEX Ethics Platform by CI’s Senior Director on Risk Management and Compliance. The Alliance AGM Committee is responsible for monitoring the implementation of decisions and agreements made with the aggrieved party. A report on the
proposed response, and the actions that followed that result will be sent by the Alliance AGM Committee to the involved parties.

*If the aggrieved party is unsatisfied with the response*, the aggrieved party will be informed about other alternatives that may be available, including the use of judicial or other alternative mechanisms for recourse.

Other alternatives (after using the AGM) available to the aggrieved party include

- **GEF Commissioner**
  
  If the aggrieved party is not satisfied with the outcome of the Alliance AGM, the grievance may be submitted to the GEF Commissioner.

<table>
<thead>
<tr>
<th>Mr. Peter Lallas</th>
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<tbody>
<tr>
<td>GEF Conflict Resolution Commissioner</td>
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<tr>
<td>E-mail: <a href="mailto:plallas@thegef.org">plallas@thegef.org</a></td>
</tr>
<tr>
<td>Address: Global Environment Facility</td>
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<tr>
<td>The World Bank Group, MSN N8-800</td>
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<tr>
<td>1818 H Street, NW</td>
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<tr>
<td>Washington, DC 20433-002</td>
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- **Court of Law**
  
  If the aggrieved party is not satisfied with the outcome from the GEF they can refer the matter to a Court of Law for redress.

7. AGM for Non-Compliance with Alliance Safeguard Policies

For cases related to non-compliance on the part of the Alliance in the implementation of environmental and social safeguards, the Director of Compliance and Risk Management does an initial determination of the eligibility of request based on the Exclusion Criteria as described below.

Based on determination, the Director of Compliance and Risk Management will either follow up on complaint (reject complaint based on exclusion criteria) or designate a panel to conduct as needed a thorough and objective review of the grievance. The panel should consist of 2-5 members with technical expertise in environmental and social safeguards and should have at least one member with knowledge and experience of working in the country where the grievance took place.

The panel will review the case looking at eligibility criteria, etc. Based on the initial review, the panel will send findings to the Director of Compliance and Risk Management.

If the case is not eligible for the grievance review process, the panel will notify the Director of Compliance and Risk Management.

If the panel determines that the case warrants further review through the grievance process, the Director of Compliance and Risk Management will notify the CI-GCF Agency and CI Leadership Group on panel findings. The Director of Compliance and Risk Management will also convene a meeting of Alliance Management Team to discuss the panel review with Alliance Steering Council. The purpose of this meeting is two-fold: 1) the Alliance Management Team
will explain the actions of the team in relation to the complaint and 2) can serve as a mitigation measure.

Alliance Management Team will draft a management response to the complaint which the Director of Compliance and Risk Management will provide to the panel.

The Panel will notify all parties involved and will draft a Terms of Reference (TOR) for a full review and provide to all parties for comments. The Director of Compliance and Risk Management will authorize the TOR for the review.

The Panel will conduct the full review based on the approved TOR. The review can include desk reviews, meetings, discussions, and site visits.

The Panel will provide a draft report to the complainants and the Director of Compliance and Risk Management for comments. The Director of Compliance and Risk Management will ensure that Alliance Management Team provides comments to the report.

The Panel will issue a final report based on comments received from complainants and Alliance Leadership Team.

If the report concludes that the Alliance’s noncompliance caused direct and material harm, Alliance Management Team will propose remedial actions.

The Director of Compliance and Risk Management will communicate remedial actions to the Panel who will then communicate these actions along with the final report to the complainants involved.

The Director of Compliance and Risk Management will monitor implementation of remedial actions and will prepare annual monitoring reports for submission to Alliance Leadership Team.

Monitoring and final reports will be included in the Complaints Registry (available online) and will be available to all parties involved.

Compliance review will not investigate the country or executing entities. The conduct of these parties will be considered only when relevant to the assessment of Alliance, compliance with all policies related to the GEF process, including Environmental and Social Safeguards. Compliance review does not provide judicial-type remedies such as injunctions or monetary damages.

Exclusions

Complaints will be excluded from accountability, problem solving and compliance review functions if:

- It is not related to the Alliance’s actions or omissions during formulating, processing, or implementing GEF-funded projects;
- Complainants have not made good faith efforts to address the problem with the implementing partner or Alliance;
- Two or more years have passed since the grant closing date of the Alliance project;
• It is frivolous, malicious, trivial, or generated to gain competitive advantage;
• It is about the procurement of goods and services, including consulting services;
• It is about fraud or corruption in Alliance-funded projects or by Alliance staff;
• It is about the adequacy or suitability of Alliance’s existing policies and procedures;
• It is not within the jurisdiction of Alliance’s Accountability and Grievance Mechanisms, or related to Alliance personnel matters; and/or
• It is about Alliance non-operational housekeeping matters, such as finance and administration.
• Any integrity related grievance related to may be reported through CI’s EthicsPoint hotline at: https://secure.ethicspoint.com

The grievance review function also excludes complaints that:

• Are the responsibility of other parties such as the National Government or implementing partner, unless the conduct of these other parties is directly relevant to the assessment of Alliance compliance with its operational policies and procedures;
• Do not involve Alliance noncompliance with its operational policies and procedures;
• Relate to the laws, policies, and regulations of the country, unless this directly relates to Alliance compliance with its operational policies and procedures; and/or
• Are about matters already considered by the Compliance Team unless new evidence is presented and unless the subsequent complaint can be readily consolidated with the earlier complaint.

**Remedial actions to mitigate the non-compliance**

Recognizing that each situation regarding non-compliance will be project specific, the following actions are proposed steps to mitigate the lack of compliance. The Director of Compliance and Risk Management (with direction from the General Counsel) will conduct the following actions:

a) Work with the Alliance to understand any deviations from Alliance Operations Manual and the ESMF;

b) Propose corrective actions (adaptive management) with a corresponding timeline;

c) Ensure that compliance issues are included in the Financial Management and Control Framework (related to managing institutional risk).

**In cases of non-compliance on Alliance funded projects**, the Alliance Management Team will be accountable to Alliance Steering Council. The role of the Alliance Management Team is to ensure that all Alliance policies and procedures were followed in the implementation
In case of continuous non-compliance actions to be taken by the Alliance. If the Compliance Review process determines that the Alliance is in continuous non-compliance, the Alliance Steering Council will have the authority to cancel, suspend or terminate the project, and will notify the GEF Secretariat.

Information disclosure: Printed materials about the accountability and grievance review process will be distributed as widely as possible, specifically at the field program where the project is being implemented and/or executed. The accountability and grievance review process will also be made publicly available on the Alliance’s website. The stakeholder consultation process is one of the mechanisms that can be used to resolve conflicts. The Alliance Operations Manual details the ESMF that includes the Accountability and Grievance Mechanism as part of the implementation of the safeguards

- Basic information about the complaint review procedures;
- Instructions for how to file a complaint;
- Detailed rules of procedure;
- A registry of complaints, including basic information about the complaint and the complaint’s status;
- Draft and final terms of reference and investigation reports as discussed above; and
- Annual reports describing the compliance review activities.

8. Grievance Close Out

In the case of a successful resolution from the proposed response from the Alliance AGM Committee, CI’s Senior Director of Risk Management and Compliance will document the satisfactory resolution in the NAVEX Ethics Platform. In cases where there have been minor risks, impacts and/or negative publicity, written documentation from the aggrieved party including satisfaction with the response will be encouraged.

In cases of an unusual response to the proposed response from the Alliance AGM Committee, the CI’s Senior Director of Risk Management and Compliance will

- document the steps taken;
- document communication with the aggrieved party (and other stakeholders if there has been substantial effort to initiate or complete a multi-stakeholder process); or
- document the decisions made by the Alliance AGM Committee and the aggrieved party about referral or recourse to other alternatives, including legal alternatives.
Monitoring & Transparency

All grievance submissions processed by the Alliance AGM must be entered into the NAVEX Ethics Platform which will also allow for tracking and documenting of all steps taken in the AGM process.
Appendix A: Site-Level AGM Start-Up Checklist

In the initial phases of establishing a project site under the Blue Nature Alliance, a specific Site-Level AGM will need to be established in order to provide project stakeholders with an effective and efficient process for expressing and resolving concerns and complaints.

The following check-list provides guidance for new project sites to set up a Site-Level AGM:

- **Create Specific Site-Level AGM Manual**
  Appendix B of this document is a Site-Level AGM Manual template that can be used to create a site-specific AGM Manual. Follow the prompts within the template to customize the AGM to the specific site context.

- **Designate Site-Level Coordinator**
  Each project site should have a designated Coordinator who will be responsible for managing the site-level AGM. The Coordinator should be a Blue Nature Alliance or lead implementing partner staff and should have dedicated time and funding to support performing the role of Coordinator. The Coordinator will work closely with the Blue Nature Alliance Safeguards Advisor to successfully build, manage and implement the site-level AGM.

- **Designate Site-Level Accountability and Grievance Mechanism Committee (AGMC)**
  The Site-Level AGMC should be composed of 3-7 representatives from the Alliance and Implementing Partners. Each Implementing Partner responsible for implementation in a site should designate one representative to sit on the AGMC. The description of roles and responsibilities of the AGMC are outlined in Section III. Site-Level AGM of this document.

- **Designate Site-Level AGM Contacts**
  In order to be properly accessible to the stakeholders on the ground, site-level AGM contacts should be designated. Depending on the stakeholders in a specific site, one or more local contacts should be designated to serve as contact points for stakeholders to submit grievances. Local contacts can be individuals, local government, or local organizations that have a physical office or presence in the site. With the assistance of the Blue Nature Alliance Safeguards Advisor, the designated local contacts will be briefed on their responsibilities to receive grievances from local stakeholders and pass them on to the Site-Level Coordinator.

- **Create Site-Level AGM Promotional Materials**
  To spread awareness of the AGM and provide local stakeholders with the pertinent information to submit grievances, a series of promotional materials will be created using templates and with the assistance of the Blue Nature Alliance Safeguard Manager. These materials can include posters and brochures that can be made available to stakeholders at meetings and consultations as well as in the officer of local partner organizations.
Appendix B: Site-Level AGM Manual Template

I. Purpose

Accountability and Grievance Mechanism (AGM) Operations Manual

This AGM Operations Manual outlines the process and procedures to successfully operationalize the Site-Level AGM for [enter name of site] under the Blue Nature Alliance. This document provides specific guidance on the collection, recording, processing, and resolving of grievances at the site-level. The policies and procedures outlined in this document include the use of best practices to

- address breaches of policy and procedure;
- to be independent, transparent and effective;
- to be accessible to project-affected people;
- to maintain records on all cases with due regard to confidentiality of complainants’ identity and information; and
- to take appropriate measures to minimize risk of retaliation to complainants.

Site-Level AGM

The purpose of the site-level AGM is to provide project stakeholders with an effective and efficient process for expressing and resolving concerns and complaints. This transparent and accessible process promotes a mutually constructive relationship with partners and stakeholders and reduces the overall risk to the project.

Alliance AGM

The purpose of the Alliance AGM is to mediate and resolve grievances that are unable to be resolved at the site-level. The Alliance AGM is also designed to address high-risk concerns and complaints, such as those that include conflict, fraud or corruption. The Alliance AGM is managed by a neutral party and is empowered to undertake the necessary steps to protect against conflict of interest and maintains the highest standards for transparency.

II. Responsible Persons and Bodies

Accountability and Grievance Mechanism Committee (AGMC)

The AGMC is comprised of select site-level directors and managers with representation from all implementing and partner agencies within a particular site. This body is responsible to

- oversee the running of the AGM under its designated purpose;
- monitor the implementation of decisions and resolutions;
- undertake fact-finding activities when necessary; and
- facilitate dialogue and mediation.

For [enter name of site], the AGMC will consist of the following individuals:

1. [name, title, organization]
Alliance Safeguards Advisor

The Alliance Safeguards Advisor is responsible for supporting the Coordinator to ensure that the site-level grievance mechanism operates as intended to provide a transparent and open process to resolve grievances. This includes

- conducting the eligibility screening and assessment of grievances;
- supporting the Coordinator to keep complainants informed of the grievance process;
- providing any support or guidance to the Coordinator and/or Committee; and
- communicating with the Alliance level mechanism to ensure that any sensitive grievances are elevated appropriately.

Coordinator – Alliance Grants and Contracts Manager

The Coordinator is responsible for day-to-day management of the AGM process, which includes

- receiving, logging, and storing complaints in paper form as well as in an electronic database;
- reviewing, processing, and acknowledging complaints when they are received;
- facilitate the committee to assign suitable persons to conduct any information gathering and/or to develop appropriate responses to complaints;
- following up with the complainant to inform them of the status of their complaint, what the steps are in the process of addressing the complaint and when they will next be updated;
- reporting and coordinating with the AGMC and the Blue Nature Alliance Safeguards Manager on the processing of all complaints received.

For [enter name of site], the Coordinator will be [enter name, title, organization].

Blue Nature Alliance Staff and Implementing Partners

Blue Nature Alliance Staff and implementing partners working on the ground in a project site are responsible to

- liaise with local point persons to collect any paper grievance submission forms;
- logging face-to-face grievances within the AGM database;
- receive grievances and immediately record them using site specific forms and procedures; and
- posting Alliance AGM products and materials in appropriate online and physical forums accessible to all stakeholders.
• Disclosing the AGM to key stakeholders in a manner, language and format that suits local context

For [enter name of site], the Alliance, along with the following implementing partners are:

1. [organization, leader/director/representative]
2. [organization, leader/director/representative]
3. [organization, leader/director/representative]
4. ....

**Local Point Persons**

Local Point Persons are chosen based on the preferences of local communities and stakeholder groups and are responsible to receive grievances on behalf of the project site and are expect to

• receive and/or complete the grievance submission forms on behalf of complainants’; and
• store, send and/or transport grievance submission forms to the Coordinator per the site-specific procedures.

For [enter name of site], the following individuals/organizations have been designated as Local Point Persons:

<table>
<thead>
<tr>
<th>Individual/Organization</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>[enter name of individual/organization]</td>
<td>[enter phone, email, local address]</td>
</tr>
<tr>
<td>[enter name of individual/organization]</td>
<td>[enter phone, email, local address]</td>
</tr>
<tr>
<td>[enter name of individual/organization]</td>
<td>[enter phone, email, local address]</td>
</tr>
</tbody>
</table>

**III. Process**

1. **Submit a Grievance**

   The aggrieved party must submit a grievance to Local Point Persons, staff from the Blue Nature Alliance or Implementing Partners, or the Safeguard Coordinator. The submission of grievances should include the following information:

   • name, designation, address and contact information;
   • if a complaint is made through a representative, the name/s of the person/s on whose behalf the complaint is made;
   • whether the aggrieved party chooses to keep their identify confidential;
• a description of the grievance including location and data/time of its occurrence; and
• a brief description of the impacts of the occurrence.

Grievances can be submitted in-person, electronically, or in written form and submitted per the site-specific contacts listed in Section II. Responsible Persons and Bodies.

The primary contact for submission of grievances for [enter name of site] are:

Address: [enter address for main implementing partner]
Phone: [enter phone number]
Contact: [enter name/organization]

2. Receive and Log Grievance

Only staff from the Blue Nature Alliance and Implementing Partners as well as designated Local Point Persons are authorized to collect paper grievances. Furthermore, staff should liaise with Local Point Persons on a regular basis to facilitate the timely collection of grievances from the field. Once received, the grievances should be immediately transmitted to the Coordinator and logged in a database and stored.

3. Eligibility Screening

After received and logged, the Coordinator will work with the Alliance Safeguards Advisor to screen the grievance to determine if a grievance is eligible for processing through the AGM. Eligibility is determined by the following criteria:

• Is the grievance made in good faith?
• Does the grievance directly relate to the project?
• Are there other organizations that are more appropriate to address the issue?
• Is the grievance submitted by or on behalf of a person or people affected by the project or program?
• [enter any site-specific criteria to consider in addition to the following criteria]
• …

Grievances that are found to be outside the scope of the AGM will either be directed to other organizations more appropriate to handle the grievance, or, if not, closed out of the AGM. This includes grievances from complainants who provide ineligible or incorrect information.

4. Acknowledge, Assess, Convene & Assign

ACKNOWLEDGE

Within [enter number days] days the Coordinator or Alliance Safeguards Advisor will contact the complainant using the most suitable method available to let them know that the grievance was received, their reference number assigned through the database, next steps in the process and the point of contact. The Coordinator or Alliance Safeguards Advisor will also verify the contact information for the complainant if necessary and ensure that the basic information required to proceed in the AGM process is provided. If the grievance is ineligible to proceed in
the AGM, the Coordinator or Alliance Safeguards Advisor should inform the complainant of the reason for ineligibility and direct them to other organizations more appropriate for the complaint if possible.

Assess

Eligible grievances will be assessed by the Alliance Safeguards Manager based on risk level and category:

<table>
<thead>
<tr>
<th>Risk Level</th>
<th>Description</th>
</tr>
</thead>
</table>
| 1          | The complaint is straightforward, the issue is clear, and the solution is obvious and resolutions can be developed and provided immediately. This may include cases where the grievance is:  
- addressed by sharing available information;  
- addressed by a straightforward decision/action;  
- already being investigated; or  
- in the process of being resolved. |
| 2          | The complaint lacks full necessary information and  
- needs to be investigated for further information and may involve engagement with multiple stakeholders; or  
- the resolution of the grievance involves action from a particular stakeholder. |
| 3          | Grievances with, or with the potential to have, a significant adverse impact on, and interaction with, stakeholders. These may include:  
- repeated grievances;  
- clear/strong evidence of (threatened) violence; or  
- clear/strong evidence of illegal activity, victimization or corruption, etc.  
- Reputational (to CI or donor) |

Categories | Description (This list is not intended to be exhaustive and will be modified and possibly expanded in order appropriately categorize grievances received.) |
---|---|
Environmental | Grievances related to Blue Nature Alliance or Implementing Partner staff/stakeholders at demonstration sites causing impacts like  
- destruction to surrounding flora or fauna; |
The results of the assessment of the grievance should be documented and recorded by the Coordinator in the appropriate database as directed by the Blue Nature Alliance Safeguards Manager.

**Convene & Assign**

Following the acknowledgement and assessment of the grievance, the Coordinator will then convene the AGMC within [enter number of days] days. The AGMC will first be convened virtually and, if determined necessary, convene in person to review the grievance and determine the next steps. The Based on the risk and category of the grievance, the AGMC will assign persons to spearhead the resolution of the grievance and set an appropriate timeframe to develop resolution and present it to the aggrieved party. Depending on the sensitivity of the grievance, the AGMC may also stipulate how the assigned persons should engage with the relevant stakeholders. Any necessary resources needed to address the grievance will also be allocated.

In the case of high risks and grievances that merit a Risk Level 3 risk categorization, the grievance should be elevated to the Alliance AGM (see Section IV. Alliance AGM).

5. Development of a Response
After the assigned persons are designated by the AGMC to develop a resolution, two potential responses can be considered:

- direct action based on the available information; or
- further assessment and information gathering is needed to determine the most appropriate action. This may include
  - engagement/negotiation with the complainant;
  - engagement with other stakeholders; or
  - field visits and fact-finding missions.

Grievance responses, whether direct action or further investigations, should consider the complainant’s views about the desired outcomes or process for grievance resolution. The response may suggest a specific remedy or an approach for how to settle the grievance.

Assigned persons should develop a proposed response to the aggrieved party that includes

- a clear explanation of the response and why it is being proposed; and
- what the complainant’s choices are, given the proposed response. For example:
  - Agreement to proceed
  - Further dialogue on proposed action
  - Participation in proposed assessment and engagement process

Assigned persons and the AGMC should develop a proposed response that aligns with [enter local conflict resolution practices/processes and any local leaders that should be consulted in the development of a response and resolution].

The AGMC is responsible for reviewing and approving a proposed response before it is communicated to the aggrieved party. If the AGMC is unable to come to an agreement, the grievance is then elevated to the Alliance AGM.

6. Agreement and Implementation of a Response

The Coordinator, Alliance Safeguards Advisor or representative from the AGMC will communicate the proposed response to the aggrieved party within the timeframe designated by the AGMC. The aggrieved party can choose to agree or disagree with the proposed response. The response is then recorded and logged in a database by the Coordinator. The AGMC is responsible for monitoring the implementation of decisions and agreements made with the aggrieved party.

*If the aggrieved party agrees* with the proposed response, the AGMC can proceed with the proposed response. In cases, where the proposed response is to initiate investigations or engage stakeholders, a collaborative process may be conducted by a neutral third party as agreed to by both the aggrieved party and the stakeholders in question. This process should clarify

- the issues and events that led to the complaint;
- the stakeholders involved in those issues and events;
- the stakeholders’ views, interests, and concerns;
• whether key stakeholders are willing and able to engage in a joint, collaborative process (which may include joint fact finding, dialogue and/or negotiation) to resolve the issues;
• how the stakeholders will be represented, and what their decision-making authority will be;
• what work plan and timeframe the stakeholders would use to work through the issues; and
• what resources they will need and who will contribute those resources.

Whether or not a collaborative process appears viable, the Coordinator will communicate the assessment findings to the complainant and other stakeholders, with a recommendation on how to proceed. A report on the proposed response, and the actions that followed that result will be sent by the AGMC to the involved parties.

*If the aggrieved party disagrees* with the proposed response, the Coordinator will log the disagreement to the response in the AGM database. Designated persons from the AGMC will draft a review of the reasons for disagreement and suggest another approach. [Enter any site-specific conflict resolution practices/processes and any local leaders that should be consulted in the development of a response and resolution.] This review of the reasons for disagreement and alternative approach should be reviewed and approved by the AGMC within a designated timeframe before being communicated to the aggrieved party.

*If the aggrieved party still disagrees* after reviewing the alternative approach suggested by the AGMC, the aggrieved party will be informed about other alternatives that may be available, including the use of judicial or other alternative mechanisms for recourse.

Other alternatives (after using the AGM) available to the aggrieved party include

• Alliance AGM

  Address: Attn: Blue Nature Alliance
  2011 Crystal Drive, Ste 600
  Arlington, VA 20222

  Email: alliancegrievance@conservation.org

  CI’s Ethics Hotline: [https://secure.ethicspoint.com](https://secure.ethicspoint.com)

• GEF Commissioner

  If the aggrieved party is not satisfied with the outcome of the Alliance AGM, the grievance may be submitted to the GEF Commissioner.

  Mr. Peter Lallas
  GEF Conflict Resolution Commissioner
  E-mail: plallas@thegef.org

  Address: Global Environment Facility
  The World Bank Group, MSN N8-800
  1818 H Street, NW
  Washington, DC 20433-002
The aggrieved party must first refer the matter to the Alliance AGM before the grievance may be submitted to the GEF Commissioner. If the aggrieved party is not satisfied with the outcome of the Alliance AGM, the grievance may be submitted to the GEF Commissioner.

- **Court of Law**
  
  If the aggrieved party is not satisfied with the outcome from the GEF they can refer the matter to a Court of Law for redress.

7. **Grievance Close Out**

   In the case of a successful resolution from the proposed response from the AGMC, the Coordinator will log into the AGM database and document the satisfactory resolution. In cases where there have been minor risks, impacts and/or negative publicity, written documentation from the aggrieved party including satisfaction with the response will be encouraged.

   In cases of an unusual response to the proposed response from the AGMC, the Coordinator will

   - document the steps taken;
   - document communication with the aggrieved party (and other stakeholders if there has been substantial effort to initiate or complete a multi-stakeholder process); or
   - document the decisions made by the AGMC and the aggrieved party about referral or recourse to other alternatives, including legal alternatives.

IV. **Monitoring & Transparency**

   All complaints received will be entered into an electronic database. All grievance submissions processed by the AGM must be entered into this database which will also allow for tracking and documenting of all steps taken in the AGM process. This database will also be used by the Blue Nature Alliance to generate analysis of the grievances received, including the number of grievances under investigation or closed out, as well as the geographic distribution of grievances.

   Information stored in the AGM database will only be accessible through a login system. This feature tracks changes made to the grievance entries, when they were made, and with what login credential. This is meant to deter any attempts to alter illegally any records within the database. A detailed guide to use and manage the AGM database will be made available.

V. **Operational Protocols for the AGM Committee**

   The AGMC as the highest decision-making body in the [enter site name] AGM. All members of the AGMC, which are designated when the AGM is established prior to on-the-ground implementation, must be consulted on all grievances that are deemed eligible by the Alliance
Safeguards Advisor. In the event that the AGMC is not in agreement on the handling of a grievance, that grievance is to be elevated to the Alliance AGM.
Appendix C: Site-Level Grievance Form Template

<table>
<thead>
<tr>
<th>Name:</th>
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<tbody>
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<table>
<thead>
<tr>
<th>Designation:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address</th>
</tr>
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<tbody>
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<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Contact Information and Preferred Way to be Contacted (Phone, email, language preferences, etc.):</th>
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<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

If a complaint is made through a representative, the name/s of the person/s on whose behalf the complaint is made.

Does the aggrieved party wish to keep their identity confidential?
☐ Yes  ☐ No

Describe the grievance including the location and data/time of its occurrence.

Briefly describe the impact of the occurrence.
ACCOUNTABILITY AND GRIEVANCE MECHANISM

The SITE NAME is collaborating with the Blue Nature Alliance to SHARED GOAL. The Grievance Mechanism described here is a platform for transparency and is a commitment to respecting the thoughts and wishes of all our stakeholders.

What is a grievance?
A grievance is a complaint about something that is affecting you negatively. In this case it is a complaint about a negative impact of the Blue Nature Alliance project.

Who can report a grievance?
Anyone affected by the work of the Blue Nature Alliance.

Why should someone report a grievance?
If something about the Blue Nature Alliance project is bothering you, then report it. The Blue Nature Alliance aims to support projects that have a positive impact.

What is a grievance mechanism?
An Accountability and Grievance Mechanism is a way of collecting, recording, and resolving grievances. This mechanism is managed by NAME.

What will happen when I report a grievance?
The grievance will be addressed through an open and transparent process so that together, you and the Blue Nature Alliance and NAME may find a suitable solution to the problem. You will be treated with confidentiality and protected from retaliation.

To report a grievance, you may speak with a staff member of NAME or NAME.

PHONE

ADDRESS

You may also email your grievance to alliancegrievance@conservation.org

ABOUT THE ALLIANCE

The Blue Nature Alliance works collaboratively with communities, governments, researchers, NGOs, and the private sector to advance 18 million square kilometers of new, expanded, improved management, and/or upgraded protections of ocean conservation areas.

The Alliance is powered by Conservation International, the Pew Charitable Trusts, the Global Environment Facility, the Minderoo Foundation and the Rob and Melanie Walton Foundation.

CONTACT US:
bluenaturealliance@conservation.org
www.BlueNatureAlliance.org