**DRAFT: Grievance procedure templates**

**How to use this template**

The following templates are designed to assist your organisation to develop a grievance process which aligns with investor standards on grievance management, particularly IFC Performance Standard 2 (PS2).

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| **IFC Performance Standard 2 on Grievance (PS2.20)** |
| The client will provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The client will inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed. The mechanism should not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.Where national law may differ from the requirements of PS2, it is expected that clients will comply with whichever requirements are the most stringent. |

Worker grievances refer to complaints or concerns which pertain to an individual’s working environment and relations. For example, health and safety concerns, discrimination, working conditions, and the organisation or allocation of work.

The purpose of a grievance procedure is to clearly explain what workers must do when raising a work-related complaint. An effective grievance mechanism should enable workers within the mechanism’s scope to report a grievance (anonymously, if required), facilitate assessment and resolution, and ensure clear communication and transparency among those involved. Grievances are typically raised and resolved informally; however, some complaints may require more formal resolution.

Certain grievances, particularly those pertaining to gender-based violence and harassment (GBVH), may require special consideration due to the seriousness of potential allegations and the barriers which workers may face when raising GBVH-related complaints. Grievance procedures should account for these sensitivities by:

* Designating specialist contacts and roles to receive and resolve complaints pertaining to GBVHI. These individuals should have the skills and training necessary to ensure that complaints are addressed in a timely and appropriate manner, and with regard for the safety and confidentiality of the individuals impacted. Gender contact points and specialised GBVH grievance committees with adequate female representation are common approaches to ensuring that these grievances are addressed appropriately. For further guidance on developing survivor-centric and confidential grievance processes, a template policy on gender-based violence and harassment is available.
* Ensuring that available channels for raising grievances are accessible to women and vulnerable groups. This may require ensuring that multiple channels are available, including anonymous hotlines, complaints boxes or designated email addresses. These channels should also be advertised and made known to the workforce through training, orientation, workplace posters, and other communications as appropriate. Particular groups of workers may find it challenging to raise complaints or access grievance mechanisms due to the nature or organisation of their work, such as itinerant workers or those without a fixed workplace (e.g. “gig” workers). The needs of these workers should be considered, and some companies have used digital technologies as a tool for enhancing worker voice and access to grievance (see BII paper on “Enhancing workforce engagement with technology” and template policy on non-employee workforce). Other workers may face barriers due to their precarious status (e.g. refugees or migrant workers) or language and literacy barriers. In such cases, accessibility should be promoted through translation of core policies, trained contact persons with appropriate language skills, and use of non-written communication where appropriate.

Below, you will find the following templates:

* Template grievance procedure: The grievance procedure template may be used as a basis for your organisation’s procedure, and should be modified according to your company’s business model and structure. When deciding roles and responsibilities for grievance resolution, it is important to consider whether the individuals / teams identified a) have sufficient responsibility and authority to investigate and provide resolution, and b) are conflicted or implicated in the complaint / allegations.
* Template grievance reporting form: The reporting form provides a standardised format for complainants to submit formal grievances. The form is designed to ensure that complainants have attempted informal resolution (where appropriate) and can clearly define the outcome(s) being sought.
* Sample grievance log: The purpose of a grievance log is to ensure that grievances which are formally escalated are systematically recorded and tracked. This ensures that timelines in the grievance procedure are respected, accountability is maintained and aggregate grievance data or information can be analysed. When populating and administering a grievance log, proper consideration should be given to confidentiality and privacy issues, particularly given that sensitive issues are likely to be included.

**Template grievance procedure**

All grievances will be treated as confidential, and relevant information will only be divulged as required to promote satisfactory fact finding or resolution and based on consent where appropriate. Anonymous complaints can be made, however this may limit the ability of responsible individuals to follow up, investigate and / or provide specific remedies.

Workers should use this grievance policy / procedure without fear of reprisals. No worker will be reprimanded for raising a grievance themselves or assisting another colleague in raising a grievance. However, deliberately making false allegations can be treated as a disciplinary manner.

#### Step 1 – Informal resolution

If you have an issue or complaint related to your work or someone you work with, you should get in touch with your [MANAGER / SUPERVISOR] and seek an informal resolution. In some cases, it is recognised that informally resolving a concern with your [MANAGER / SUPERVISOR] may not be appropriate. For example:

* If your complaint directly relates to or implicates your [MANAGER / SUPERVISOR], you may raise an informal complaint directly to [NEXT LEVEL OF SENIORITY].
* If your complaint pertains to gender issues, including gender-based violence and harassment (GBVH), you may choose to contact [GBVH LEAD OR ALTERNATIVE CONTACT POINTS] or immediately escalate your complaint using the special procedure elaborated in Step 2.

Where attempts to resolve a dispute informally have not been successful, a more formal grievance process may be necessary.

#### Step 2 – Formal grievance

If you are unable to resolve an issue informally, you should submit the grievance to your [MANAGER / SUPERVISOR or APPROPRIATE DEPARTMENT OR ROLE] in writing using the annexed form [PROVIDE DETAILS OF SPECIFIC EMAIL ADDRESS, LOCATION ETC WHERE GRIEVANCES TO BE SUBMITTED].

If your complaint pertains to your [MANAGER / SUPERVISOR], you may submit your written complaint directly to [NEXT LEVEL OF SENIORITY or APPROPRIATE DEPARTMENT OR ROLE].

In all cases, grievances may be submitted anonymously, including grievances related to gender issues and GBVH (see below).

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| **Grievances related to gender issues, including GBVH:** In the case of complaints which raise gender-related issues, including GBVH, you may wish to submit your grievance to the gender contact point [PROVIDE APPROPRIATE DETAILS, IF RELEVANT] or provide an anonymous grievance. If your grievance raises gender issues, your grievance will be escalated and addressed at Step 3 by [SPECIALISED GENDER FUNCTION OR COMMITTEE] and on an expedited timeframe based on the severity of allegations. Step 4 appeals will be addressed in a similarly expedited manner by the [SPECIALISED APPEAL FUNCTION OR COMMITTEE]. Strict confidentiality will be maintained throughout the grievance-handling process, regardless of the findings and outcomes, and measures will be taken to ensure the safety of those who experience or report GBVH. Any breach of confidentiality requirements or any retaliation against those who make GBVH reports will be treated as a serious disciplinary matter. |

#### Step 3 – Grievance meeting

Following submission of a formal grievance, a grievance meeting will be arranged by [APPROPRIATE DEPARTMENT OR ROLE] within 5 working days to discuss your reported grievance and identify potential solutions. You have the right to be accompanied by a colleague or workers’ representative, where relevant.

Following the meeting, [APPROPRIATE DEPARTMENT OR ROLE] will conduct further investigations, interviews or follow-ups as required.

You will be provided with a written decision on the outcome of your grievance, usually within 72 hours of the grievance meeting. If further information or investigation is required, you will be informed of this and a revised timeframe for a decision will be communicated.

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| **Anonymous grievances:** [APPROPRIATE DEPARTMENT OR ROLE] will take all anonymous grievances seriously and use their best efforts to investigate, follow-up and implement appropriate solutions. However, due to the nature of anonymous grievances, there may be limitations in the ability of [APPROPRIATE DEPARTMENT OR ROLE] to provide specific responses, remedies or follow-up.  |

**Step 4 – Appeal**

If you are unhappy with the outcome of your grievance, you may appeal. The request for appeal should be made in writing within 5 days of receiving a written decision under Step 3, and should be addressed to [APPROPRIATE SENIOR DECISIONMAKING ROLE].

Within 5 days of the written appeal request, you will be invited to an appeal meeting to discuss your appeal and identify potential solutions. You have the right to be accompanied by a colleague or workers’ representative, where relevant.

Following the appeal meeting, [APPROPRIATE SENIOR DECISIONMAKING ROLE] will conduct further investigations, interviews or follow-ups as required.

You will be provided with a final decision on the outcome of your grievance, usually within 72 hours. If further information or investigation is required, you will be informed of this and the timeframe for a decision will be communicated.

**Template grievance reporting form**

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| Section 1 – Contact information |
| Note: You may omit this information and provide an anonymous complaint. However, this may limit the ability of responsible individuals to follow up, investigate and / or provide specific remedies. In all cases, the information you provide will be treated with strict confidentiality, and relevant information will only be divulged as required to promote satisfactory fact finding or resolution and based on consent where appropriate.  |
| First name |  | Last name |  |
| Job title |  | Employee ID |  |
| [Department / team] |  | [Manager / supervisor] |  |
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| Address |  |
| Contact phone number | *(This should be the best number to contact you on to arrange meetings)* |
| Contact email address |  |
| If you intend to be represented by a trade union or another colleague during this process, it is recommended that you contact your representative at the earliest opportunity, if you have not already done so. |

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| Section 2 – Information about your complaint |
| Please describe the nature of the concern (please include specific details, such as relevant dates of events, content of discussions, witnesses etc). |
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| Section 3 – Describe attempts at early resolution |
| Please indicate how you have tried to resolve this matter at an early stage and why you are requesting escalation to ‘Step 3’, if applicable. |
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| Section 4 – Desired outcomes |
| Please give details of your desired outcomes and how this may best be achieved |
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| Section 5 – Submission and receipt  |
| Signed: |  | Date: |  |
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| Received by: |  | Date received: |  |

**Sample grievance log**

When administering and populating a grievance log, proper consideration for the following is required:

* Access to the log should be limited to relevant individuals (e.g. grievance contact persons, HR personnel), with due consideration for confidentiality and privacy.
* Whether maintained physically or digitally, the log should be stored securely to prevent unauthorised access.
* For grievances that raise highly sensitive and confidential issues – such as gender-based violence and harassment (GBVH) – it may be necessary to maintain separate logs with even more restricted access (e.g. limited to gender contact people) and with heightened security / confidentiality safeguards in place.

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| # | Grievance description | Complainant | Category | Formal grievance received (date) | Step 3 meeting date | Step 3 outcomes and date of written decision | Appeal request received (date) | Step 4 meeting date | Step 4 outcomes and date of written decision |
|  | Brief description of key elements of complaint | Last name, First name |  E.g. pay / benefits, discrimination / harassment, health & safety  |  |   |  |   |   |   |
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