



Grievance Redress Mechanism

This document is as approved by the REC Caucasus executive Body (Collegial Trio) and is set out at the end of the document.



Abbreviations

AF	Adaptation Fund
CSO	Civil Society Organization
ED	Executive Director
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FP	Focal Point
GBV	Gender-Based Violence
GRC	Grievance Review Committee
GRM	Grievance Redress Mechanism
HQ	Headquarters
HQ-FP	RECC-Level GRM Focal Point
HR	Human Resources
ID	Identification (Case ID)
NGO	Non-Governmental Organization
PL-FP	Project-Level GRM Focal Point
RECC	Regional Environmental Centre for the Caucasus
SEA/SH	Sexual Exploitation, Abuse, or Harassment
SEP	Stakeholder Engagement Plan
SMS	Short Message Service
TOR	Terms of Reference
WD	Working Days

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Purpose, Authority, and Legal Effect

1. This Policy establishes the institutional Grievance Redress Mechanism (“GRM”) of the Regional Environmental Centre for the Caucasus (“RECC” or “the Centre”) to receive, record, assess, resolve, and report concerns and complaints arising from RECC-supported activities.
2. This Policy is issued under the authority of the Executive Director (“ED”) and approved pursuant to RECC’s internal policy adoption procedures.
3. This Policy is binding upon all REC Caucasus personnel, projects, contractors, subcontractors, implementing partners, and consultants engaged in RECC-supported activities. Contractual documents shall incorporate obligations consistent with this Policy.
4. The GRM is designed to be accessible, predictable, equitable, transparent, culturally appropriate, gender-responsive and free of retaliation, consistent with international good practice and relevant donor standards.
5. No Waiver of Rights. Use of the GRM is voluntary and does not waive any right to administrative or judicial remedies.

Scope of Application

6. The GRM applies to any Grievance (as defined in Article 3) alleging harm, potential harm, or non-compliance related to environmental and social matters, including, without limitation: environmental impacts; land, access and livelihoods; discrimination and exclusion; cultural heritage; information disclosure and consultation; community health and safety. Both substantive and procedural complaints are admissible.
7. Any Complainant (as defined) may submit a grievance, directly or through a representative. Complainants need not be project beneficiaries. Anonymous submissions are admissible.
8. The GRM shall not be used for (a) matters wholly unrelated to REC Caucasus activities; (b) procurement protests governed by separate rules; or (c) routine inquiries or feedback unconnected to harm or non-compliance (handled through stakeholder engagement). Where a submission is out of scope, REC Caucasus shall provide a written explanation and, where feasible, a referral to an appropriate channel.
9. Complaints or protests relating exclusively to procurement processes, bidding, evaluation, or contract award decisions are excluded from this GRM and shall be handled in accordance with RECC’s applicable procurement complaint procedures. Where a grievance submission concerns procurement matters, RECC shall inform the Complainant in writing of the appropriate procurement complaints channel.
10. This Policy complements, and does not replace, judicial, administrative, or donor accountability mechanisms.

Definitions

11. For the purposes of this Policy:
12. **Grievance** means any complaint, concern, or allegation of harm (actual or potential) or non-compliance linked to a REC Caucasus activity.
13. **Complainant means** any individual or group submitting a Grievance, including via representative (e.g., CSO, guardian, legal counsel). Anonymous Complainants are permitted.
14. **Project-Level GRM Focal Point (PL-FP)** means the designated person at project level responsible for intake, logging, first-line assessment, and coordination of remedial actions.
15. **RECC-Level GRM Focal Point (HQ-FP)** means the designated officer within RECC's Development Management Unit responsible for institutional oversight of the GRM, sensitive cases, and consolidated reporting.
16. **Grievance Review Committee (GRC)** means the ad hoc internal review function that may be established by the Executive Director for complex, sensitive, or unresolved cases, with gender balance and no direct involvement in the subject matter.
17. **SEA/SH (Sexual Exploitation, Abuse, or Harassment)** means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another, as well as any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
18. **Sensitive Grievance** means any grievance involving SEA/SH, GBV, violence or threats of violence, child protection concerns, severe discrimination, or other issues that require heightened confidentiality and protection measures.
19. **Gender-Based Violence (GBV)** means any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences between males and females, including but not limited to sexual, physical, emotional, and economic violence, whether occurring in public or in private life.
20. **Days** means calendar days unless expressly stated as working days (excluding weekends and official public holidays in Georgia).

Principles

21. REC Caucasus shall implement the GRM in accordance with the following principles:
22. Accessibility and Non-Discrimination - The GRM shall be free of charge and accessible through multiple channels (e.g., in-person, phone/SMS, email, web form, postal mail, suggestion boxes, and via representatives). Reasonable accommodation (translation, accessible formats, assisted filing) shall be provided.
23. Cultural and Gender Appropriateness - Procedures shall respect local norms and provide confidential options for women and vulnerable groups (including access to a female focal point).
24. Transparency and Accountability - A Grievance Register shall be maintained; redacted, aggregate information shall be disclosed via RECC's website. Public entries shall be updated within 14 days of status changes.
25. Impartiality and Due Process - Conflicts of interest shall be managed; decision-makers shall be independent of the matters under review; all parties shall have a reasonable opportunity to be heard.
26. Confidentiality and Data Protection - Personal data shall be processed on a need-to-know basis, stored securely, and disclosed only as permitted by law and this Policy. Special protection shall apply to sensitive grievances, including SEA/SH and GBV-related cases.
27. Non-Retaliation - Any form of retaliation is prohibited. Alleged retaliation shall be treated as a serious complaint and investigated within 30 days.
28. Timeliness and Predictability - Standard time limits shall apply: acknowledgment within 5 working days; proposed resolution within 15 working days for simple cases or 30 working days for complex cases (or documented extensions with reasons); appeal windows of 15 working days.
29. Effectiveness and Proportionality - Remedies shall be commensurate with the nature and severity of impacts. Where remedial action cannot be completed within six months, the case shall be escalated to senior management and, where applicable, notified to the donor per the relevant policy.
30. Learning and Improvement - REC Caucasus shall analyze trends, address systemic causes, and strengthen its ESMS accordingly.

Institutional Architecture and Responsibilities

31. Project-Level GRM Focal Point (PL-FP) - Each project shall designate a PL-FP. The PL-FP shall: (a) publicise GRM access points; (b) receive and log Grievances in Project Grievance Log; (c) acknowledge receipt; (d) screen for admissibility and urgency; (e) conduct or coordinate first-line assessment; (f) liaise with project staff/contractors for corrective action; (g) keep the Complainant informed; (h) maintain the Project Grievance Log; and (i) escalate unresolved or complex matters to the HQ-FP.
32. RECC-Level GRM Focal Point (HQ-FP) - The HQ-FP shall: (a) maintain the Master Grievance Register¹; (b) ensure consistency of procedures; (c) provide training and technical support; (d) manage sensitive cases; (e) convene (with ED's approval) the GRC where warranted; (f) consolidate reporting for management and donors.
33. Confidential SEA/SH Focal Point - The Executive Director shall designate a Confidential SEA/SH Focal Point (who may be the HQ-FP or another suitably trained senior staff member) to receive and manage Sensitive Grievances involving SEA/SH and GBV. The designated focal point shall (i) be independent of any alleged perpetrator, (ii) receive specialized guidance, and (iii) operate under strict confidentiality and a survivor-centered approach. Where a conflict of interest arises, an alternative focal point shall be appointed for that case.
34. Grievance Review Committee (GRC) - Ad Hoc Review Function convened by the ED or designee. The GRC shall comprise three to five members from relevant functions (e.g. programs, legal, safeguards, HR), include at least one woman, and exclude any person directly involved in the case. The GRC may hold hearings, obtain expert advice, and shall issue a reasoned recommendation to the ED.
35. Executive Director / Project Steering Committee - The ED is the final internal decision-maker. The ED may endorse, amend, or return a GRC recommendation, where such a committee has been convened. Particularly sensitive or strategic matters may be submitted to the Project Steering Committee / REC Caucus Executive Body (Collegial Trio).
36. Grievances concerning the Executive Director or a member of the Project Steering Committee / Executive Body (Collegial Trio) shall be entered in the Master Grievance Register and referred to the non-implicated members of the Project Steering Committee / Executive Body for independent review. The implicated person shall be recused.
37. Project Personnel, Contractors, and Partners - All personnel and contractors shall: (a) operate site-level complaint channels; (b) forward community complaints to the PL-FP within 3 working days; (c) cooperate with investigations; and (d) implement corrective actions by the agreed deadlines. Contracts shall mandate compliance with this Policy.

¹ The Master Grievance Register is separate from the Project Grievance Log and is optional for the organization to maintain.

38. Donors and Oversight Bodies - REC CAUCASUS shall disclose and report Grievances to donors in the formats and timelines they require, without compromising confidentiality obligations.

Intake, Acknowledgment, and Registration

39. Grievances may be submitted orally or in writing, for instance, via: site/liaison offices, meetings, phone/SMS hotline, dedicated email, web form, postal mail/hand delivery, suggestion boxes, or through a representative/CSO. Anonymous submissions shall be accepted and processed to the extent feasible.
40. Grievances shall be accepted in any language used by the Complainant. REC CAUCASUS shall arrange translation. Where literacy or disability is a barrier, staff shall record oral complaints on the standard Grievance Submission Form (Annex 1) and read back the content to the Complainant for confirmation where possible.
41. Sensitive grievances, including those related to sexual exploitation, abuse, or harassment (SEA/SH), gender-based violence (GBV), or exclusion, shall be managed under strict confidentiality. Such cases shall be referred directly, and may be submitted at any time, to the Confidential SEA/SH Focal Point or HQ-FP. All actions shall follow a survivor-centered approach, ensuring privacy, protection, informed consent, and non-retaliation. Information shall be disclosed only on a need-to-know basis and in accordance with applicable data protection standards.
42. The PL-FP (or HQ-FP if received centrally) shall acknowledge receipt within 5 working days, providing a case ID, designated contact, next steps, and indicative timelines.
43. All Grievances shall be recorded in the Project Grievance Log, capturing at minimum: case ID; date; channel; project/activity; location; Complainant category (e.g., individual, household, community/group, civil society organization, government stakeholder, contractor/worker, or anonymous); brief statement of issues; category (environment, social, gender, climate other); severity/priority; and status. The log should be completed with due regard to the complainant's confidentiality.

Screening, Urgency Assessment, and Admissibility

44. Within five (5) working days of receiving a grievance, the Project-Level Focal Point (PL-FP) shall conduct a preliminary screening to determine the admissibility of the submission. A grievance shall be deemed admissible if it (i) bears a reasonable connection to a RECC-supported activity; (ii) contains an allegation of actual or potential harm or a breach of applicable policy, standard, or commitment; and (iii) provides sufficient factual information to enable further processing.
45. Where the grievance indicates an imminent risk to human life or safety, or a threat of serious or irreversible environmental damage, the PL-FP shall, without delay, classify the matter as urgent, notify the Headquarters Focal Point and REC Caucasus senior management, and take all reasonable interim measures necessary to mitigate such risk pending full resolution.

46. In cases where the grievance is determined to be inadmissible, the PL-FP shall record the rationale for such determination in the grievance registry and provide written notification to the complainant, including, where appropriate, referral information to other competent mechanisms or authorities.
47. No grievance shall be summarily dismissed solely on the grounds of perceived triviality or insignificance. Except where a submission is manifestly irrelevant, abusive, or made in bad faith, all grievances shall be formally logged and provided a reasoned written response.

Assessment, Investigation, and Evidence

48. The depth and formality of assessment shall be commensurate with the gravity and complexity of the issues.
49. Simple/Moderate Cases. The PL-FP shall verify facts (site checks, interviews, document review) and prepare a Proposed Resolution within 15 working days of acknowledgment.
50. Complex/High-Risk Cases. The PL-FP shall escalate to the HQ-FP within 3 working days of determining complexity or sensitivity. The HQ-FP shall lead an investigation, and may retain experts or mediators, with a target to issue a Proposed Resolution within 30 working days of escalation.
51. Grievances related to gender issues, including sexual harassment, gender-based violence (GBV), and SEA/SH, shall be addressed with particular urgency, clarity, and fairness. Such cases shall receive priority handling and be managed in a survivor-centered and confidential manner, consistent with the principles of dignity, safety, and non-retaliation. Where appropriate and with the survivor's consent, the focal point shall provide information on, or referral to, external support services (medical, psychosocial, legal, and protection services).
52. REC Caucasus shall seek the Complainant's perspective on feasible remedies and, where appropriate, invite participation in problem-solving.

Decision, Remedies, and Implementation

53. Remedies may include, without limitation: information/clarification; apology; corrective measures; mitigation/rehabilitation/compensation (as applicable under law and contracts); operational or policy adjustments; disciplinary action; or lawful referral to competent authorities.
54. REC Caucasus shall issue a written Response Letter in a language understandable to the Complainant, stating: (a) issues raised; (b) steps taken; (c) findings; (d) agreed or proposed measures, responsible parties, and deadlines; and (e) appeal options and timelines.
55. The Complainant shall have 15 working days to indicate acceptance or to submit comments/objections. Reasonable attempts to contact an anonymous Complainant shall be recorded.

56. Upon acceptance, responsible units/contractors shall implement measures within the stated deadlines. The case status shall move Open → In Implementation → Resolved → Closed upon verification.
57. Long-Pending Actions. Where agreed measures cannot be completed within six months, the HQ-FP shall alert the ED and, where donor-financed, notify the donor according to applicable policy.

Escalation and Appeals

58. Internal Escalation Ladder.

(a) **Level 1:** Project level (PL-FP/Project Manager). The Project-Level GRM Focal Point (PL-FP) shall coordinate the initial review and resolution of the grievance, in consultation with the Project Manager.

(b) **Level 2:** HQ-FP. Unresolved or appealed cases shall be reviewed by the RECC-Level GRM Focal Point (HQ-FP), who may undertake a fresh assessment or mediation.

(c) **Level 3:** Executive Director / Ad Hoc Review GRC. Where a grievance remains unresolved or is assessed as complex or sensitive, the Executive Director (ED) shall review the case and may, at discretion, convene an ad hoc Grievance Review Committee (GRC).

(d) **Level 4:** Project Steering Committee / Executive Body (Collegial Trio). The Project Steering Committee or REC Caucus Executive Body (Collegial Trio) shall serve as the final internal authority for matters escalated beyond the ED. In cases where the grievance concerns the Executive Director or a member of the Project Steering Committee / REC Caucus Executive Body, appeals shall be handled exclusively by non-implicated members of the Project Steering Committee / REC Caucus Executive Body, who may commission an independent review.

59. A Complainant may appeal a decision sequentially, from Level 1 to Level 2, from Level 2 to Level 3, and from Level 3 to Level 4, within fifteen (15) working days of receipt of the respective Response Letter. Each higher level shall undertake an independent review and issue a reasoned written decision.
60. Upon completion of all internal levels of review under this Policy, the Complainant may refer the matter to the complaint or accountability mechanism of the relevant donor or funding agency, in accordance with the applicable donor procedures.
61. Complainants retain the right, at any time and without prejudice to the internal GRM process, to seek redress through competent judicial or administrative authorities.
62. REC Caucus shall cooperate with legitimate external reviews subject to confidentiality and data-protection obligations.

Outreach, Disclosure, and Capacity Building

63. REC Caucasus shall incorporate the Grievance Redress Mechanism (GRM) within its existing institutional webpage, (e.g., the Policy text, frequently asked questions, downloadable and online submission forms, designated contact details, and the public grievance register). GRM information shall also be displayed at project sites through posters and leaflets in relevant local languages.
64. At project launch and at key milestones, GRM briefings shall be provided, including separate sessions for women and vulnerable groups where appropriate.
65. ESMPs, SEPs, and resettlement/livelihood instruments shall reference and operationalize this GRM.
66. REC Caucasus shall train PL-FPs, HQ-FP, ad hoc GRC members (when applicable), and contractor staff on respectful intake, investigation, data protection, and non-retaliation, with periodic refreshers.

Data Management, Monitoring, and Reporting

67. The HQ-FP shall maintain the Master Grievance Register; PL-FPs shall maintain Project Grievance Logs. Core fields shall include: case ID; date; channel; project/location; Complainant category (anonymous permitted); issue type; vulnerability flags (Annex 3); actions; responsible parties; deadlines; status; outcome; satisfaction (where obtainable); closure date; and lessons learned.
68. REC Caucasus shall monitor: (a) % acknowledged within 5 working days; (b) % with proposed resolution within 30 working days (or documented extension); (c) % closed within agreed timelines; (d) complainant satisfaction rate; (e) retaliation allegations and time to initial action.
69. Program Directors shall receive dashboards with each new case as it arises; senior management shall conduct quarterly trend reviews and direct corrective actions.
70. REC Caucasus shall include grievance summaries (aggregate, non-identifying) in donor reports and promptly notify donors of material incidents as required.
71. Where grievance trends, repeated complaints, or systemic issues indicate potential weaknesses in controls, compliance, or risk management, the HQ-FP may, without disclosing personal data, refer anonymized findings to RECC's Internal Audit function for review, in accordance with RECC's Internal Audit Manual.
72. Records shall be retained for not less than seven (7) years after project closure or such longer period as required by law or donor policy. Access shall be role-based and logged.

Implementation, Interpretation, and Legal Provisions

73. Where REC Caucasus or its contractors are responsible for harm or non-compliance, timely and proportionate remedial action shall be implemented.
74. Failure by a contractor to comply with this Policy may constitute a contractual breach, subject to corrective action, withholding, suspension, or termination as permitted by contract and law.
75. Confirmed retaliation shall result in proportionate disciplinary and/or contractual measures and protective steps for the affected person.
76. Where a project-specific GRM imposes stricter requirements than this Policy, the stricter provisions shall apply.
77. In case of conflict, applicable law and mandatory donor policy shall prevail to the extent of the inconsistency; the remaining provisions shall continue in full force.
78. Headings are for convenience only and shall not affect interpretation. Undefined capitalized terms shall have their customary meaning under applicable standards.
79. This Policy shall be reviewed at least every five (5) years or sooner upon significant changes in donor standards, applicable law, or material lessons learned.
80. Substantive amendments require ED or REC Caucasus Executive Body (Collegial Trio) approval. Minor administrative updates (e.g., contacts, forms) may be issued by the HQ-FP with internal notice.
81. This Policy is effective on the date of ED approval. New projects shall comply immediately; ongoing projects shall integrate the GRM at the next feasible update.
82. If any provision is held invalid or unenforceable, the remaining provisions shall remain in full force and effect.

Annexes

Annex 1. Grievance Submission Form (Community / Stakeholder)

Project name: _____

Location (community/municipality): _____

Date of submission (DD/MM/YYYY): ____ / ____ / ____

Case ID (to be filled by RECC): _____

A. Complainant Details (optional; anonymous submissions are accepted)

- Name: _____
- Preferred contact method: Phone SMS Email In person Other: _____
- Phone: _____ Email: _____
- Address/Community: _____
- Representation (if submitting via CSO/guardian/lawyer): _____

B. Grievance Description

- What happened / is happening?

- Who/what is involved?

- Which REC Caucasus project/activity is linked?

- What harm or risk do you allege?

Environmental Social Land/Livelihoods

Information/Consultation Cultural Heritage Community Health/Safety

Gender/SEA-SH (confidential handling) climate Other: _____

C. Evidence (attach or describe)

- Documents/photos/audio/video/other: _____

D. Desired Outcome / Remedy

- _____

E. Vulnerability & Accessibility (optional)

- Do you need reasonable accommodation (translation, accessible format, etc.)?
 Yes No → If yes, please specify: _____

- Demographics (optional; for monitoring only):
 Sex: Female Male Other/Prefer not to say | Age group: <18 18–29
 30–59 60+

F. Consent for Anonymized Use in Evaluations (optional)

I consent to REC Caucasus using anonymized information from this grievance for project evaluation/learning.

Yes No

Signature (if applicable): _____ **Date:** ____ / ____ / ____

For REC Caucasus use only – Received by (name/role): _____ Channel:

In person Phone Email Web Mail Box Rep

Entered in Register by: _____ Date: // _____ Case ID: _____

Annex 2. Acknowledgment Receipt Template

Subject: Acknowledgment of Grievance – Case ID [ID] – [Project]

Dear [Name/“Complainant” if anonymous],

We acknowledge receipt of your grievance on **[date received]** concerning **[brief issue]** for **[project]**. Your **Case ID** is **[ID]**.

Next steps & timelines

- Screening/admissibility: within **5 working days** of receipt.
- Assessment & proposed resolution: **15 working days** (simple) or **30 working days** (complex) from acknowledgment.
- Your focal point: **[Name, Title], [phone/email]**.

We will keep you informed of progress. Use the Case ID in any communication.

Sincerely,

[Name] – [PL-FP/HQ-FP]

Regional Environmental Centre for the Caucasus (RECC)

Annex 3. Screening & Categorization Checklist

Case ID: _____ Project: _____ Date: // _____
Screened by: _____ (PL-FP/HQ-FP)

A. Admissibility

1. Nexus to a REC Caucasus activity? Yes No (refer out)
2. Alleged harm/potential harm or non-compliance? Yes No (feedback channel)
3. Sufficient info to proceed? Yes Request info (date requested: //____)
Decision: Admissible Not admissible (reason/where referred): _____

B. Urgency / Fast-Track Flags

- Imminent risk to life/safety? Yes → **Fast-track (immediate notification to HQ-FP and management; interim mitigation initiated without delay)**
- Serious environmental harm? Yes → **Fast-track (immediate notification to HQ-FP and management; interim mitigation initiated without delay)**
- Retaliation alleged? Yes → Investigate within **30 days**

C. Categorisation (tick all that apply)

- Environmental Social Land/Livelihoods
 Information/Consultation Cultural Heritage Community Health/Safety
 Gender/SEA-SH Other: _____

D. Severity & Priority (choose one)

- Low (minor, readily correctable)
 Moderate (localized, needs coordinated action)
 High/Critical (widespread/irreversible/rights risk)

E. Handling Path

- PL-FP simple track (target proposal/solution in **15 wd**)
 Escalate to HQ-FP (complex) → target proposal/solution in **30 wd** from escalation

Notes: _____

Annex 4. Investigation Plan Template (for Complex/High-Risk Cases)

Case ID: _____ **Project:** _____ **Lead:** [HQ-FP/Investigator]

1. Issues for Determination/Investigation

- _____

2. Scope & Methodology

- Methods: Site visit Interviews Document/data review Sampling Expert opinion Mediation
- Locations/dates: _____

3. Information Sources & Stakeholders

- Complainant(s)/representatives: _____
- Other stakeholders (contractor, authorities, CSOs): _____

4. Risk & Safeguards

- Safety/retaliation risks & mitigations: _____
- Data protection & confidentiality measures: _____

5. Roles & Responsibilities

- Lead investigator: _____ | Team members: _____
- Decision point (GRC/ED): _____

6. Timeline & Deliverables

- Start: //__ Target completion: //__
- Deliverables: Investigation memo Evidence file Proposed Resolution

Approval (HQ-FP): _____ Date: //__

Annex 5. Response / Resolution Letter Template

Subject: Proposed Resolution – Case ID [ID] – [Project]

Dear [Name/“Complainant” if anonymous],

After assessing your grievance received on **[date]**, REC Caucasus proposes the following resolution:

1. Summary of issues

- [Issue A] / [Issue B]

2. Assessment steps

- [methods; site visit/interviews/documents; dates]

3. Findings

- [factual findings and analysis]

4. Measures and timelines

Measure	Responsible party	Deadline	Verification method
[Action 1]	[Unit/Contractor]	[dd/mm/yyyy]	[e.g., site memo/photo]
[Action 2]

5. Your options

Please indicate **acceptance or comments** within **15 working days**. If you disagree, you may **appeal** to **[HQ-FP/GRC]** within the same timeframe.

We will update the public (redacted) register within 14 days of any status change.

Sincerely,
[Name] – [PL-FP/HQ-FP]
RECC

Annex 6. Closure Form

Case ID: _____ **Project:** _____ **Closure Date:** // _____

1. Resolution measures completed

- _____

2. Verification evidence (attach/tick):

Photos Site memo Payment/receipt Meeting notes Other: _____

3. Complainant confirmation (where contactable)

Satisfied Partly satisfied Not satisfied Anonymous/unreachable

Remarks:

4. Lessons learned / Preventive actions

- _____

Closed by: [PL-FP/HQ-FP] _____ **Reviewed by:** [HQ-FP] _____

Annex 7. Notice to Stakeholders: Project Feedback and Grievance Submission

The Regional Environmental Centre for the Caucasus (RECC) is committed to ensuring transparency, accountability, and the respectful treatment of all stakeholders in connection with its projects and activities.

In accordance with RECC's institutional Grievance Redress Mechanism (GRM), any individual, group, or organization with a concern, complaint, or grievance related to this project may submit it through the following officially designated channels:

Submission Channels:

- Email: Organization's GRM Focal Point – grm@rec-caucasus.org
- Online Submission Form available on the REC Caucasus official webpage
- Mail or Hand Delivery: [48/50 Mtskheta Street, 0179 Tbilisi, Georgia]

Submissions may be made anonymously. Complainants may request to engage with a female focal point, where preferred or culturally appropriate.

Procedural Guarantees and Timeline

Upon receipt of a grievance or complaint, REC Caucasus shall ensure the following procedural steps are observed:

- Acknowledgment of receipt shall be issued within five (5) working days.
- A proposed resolution will be communicated within fifteen (15) to thirty (30) working days, subject to the nature and complexity of the matter.
- If a complainant is dissatisfied with the outcome, they retain the right to appeal through a higher-level review.

All complaints are treated in a manner that is confidential, non-retaliatory, and fully compliant with RECC's safeguard and accountability standards.

For more information, please visit our website: [https://rec-caucasus.org/Regional Environmental Centre for the Caucasus](https://rec-caucasus.org/Regional-Environmental-Centre-for-the-Caucasus).

Annex 8. GRM Project Log

Case ID	Date Received	Submitted Anonymously (Y/N)	Location / Project Site	Brief Description of Grievance	Category	Urgency Level	Initial Acknowledgment Date	Status	Actions Taken / Resolution	Date Resolved	Appeal Filed (Yes/No)	Notes / Follow-Up
...

Annex 9. GRM Process Timelines

Step	Responsible	Standard Timeline
Acknowledgment of receipt	PL-FP / HQ-FP	Within 5 working days of receipt
Screening and admissibility decision	PL-FP	Within 5 working days of receipt
Proposed resolution – simple cases	PL-FP	Within 15 working days of acknowledgment
Proposed resolution – complex cases	HQ-FP / GRC (if convened)	Within 30 working days of escalation
Complainant response / appeal window	Complainant	15 working days from Response Letter
Investigation of alleged retaliation	HQ-FP / designated investigator	Initiated immediately; initial findings within 30 days
Implementation of agreed measures	Responsible unit / contractor	As specified in Response Letter
Case closure and update of public register	PL-FP / HQ-FP	Within 14 days of verification of completion

Annex 10. Rules for Reviewing Complaints by the Grievance Review Committee (GRC)

1. Grievance Redress Body

- a) The grievance shall be reviewed by the Grievance Review Committee (hereinafter referred to as the Committee);
- b) The Committee shall be established on ad hoc bases by order of the Executive Director of the Organization or a designee only for complex, sensitive or unresolved cases in each specific case within 10 days of the complaint being acknowledged as admissible, and shall consist of 3-5 members.
- c) The committee shall comprise three to five members from relevant functions (e.g. programs, legal, safeguards, HR), include at least one woman, and exclude any person directly involved in the case.
- d) The GRC may hold hearings, obtain expert advice, and shall issue a reasoned recommendation to the ED.
- e) Particularly sensitive or strategic matters may be submitted to the Project Steering Committee / REC Caucasus Executive Body (Collegial Trio).
- f) The ED is the final internal decision-maker. The ED may endorse, amend, or return a GRC recommendation, where such a committee has been convened.

2. Review of the complaint

The review of the complaint will begin only upon submission of a complaint, may be submitted orally or in writing.

3. Refusal to consider a complaint

1. The Committee shall not consider a complaint if:
 - a) there is already a decision of the Committee on the satisfaction, partial satisfaction or rejection of the complaint on the given issue;
 - b) the complaint has not been filed by an interested person;
2. The Committee shall be obliged to give the person submitting the complaint the opportunity to present his/her opinion on the given issue before issuing a decision on refusal to consider the complaint.
3. The Committee shall make a decision on refusal to consider the complaint within 5 days.

4. Time limit for considering a complaint

- a) The complaint shall be considered within 15 days.
- b) If the resolution of the complaint requires the determination of circumstances of essential importance to the case, the complaint shall be considered within 30 days.

c) In the case specified in subparagraph “b” of this paragraph, the Committee shall make a decision on extending the time limit for considering the complaint.

5. Inadmissibility of participation in the consideration of a complaint

1. The person against whom the complaint has been filed may not participate in the consideration of a complaint.

2. A person may not participate in the consideration of a complaint who:

a) is an interested party himself/herself;

b) is a relative of the interested person or his/her representative;

c) is a representative of the interested party;

3. A relative is:

a) a direct line relative;

b) a spouse, a sibling of the spouse and a direct line relative;

c) a sibling of a direct line relative in the ascending line;

d) a sibling, their spouses and children.

5. A person is obliged to declare self-recusal in the event of the circumstances specified in this paragraph.

6. The issue of recusal shall be decided by the Committee by a simple majority of votes.

6. Participation of the interested party in the consideration of the complaint

a) The Committee is obliged to give the interested party participating in the consideration of the complaint the opportunity to present their opinion.

b) The Committee is obliged to notify in writing (if possible) within 5 days about the commencement of the consideration of the complaint all persons to whom the complaint relates or against whom it has been filed and to ensure their participation in the administrative proceedings.

c) The interested party is entitled to present their opinions within 5 days from the receipt of a notification about the commencement of the consideration of the complaint by the Committee.

d) The refusal of the interested party to present their opinion, additional information or to attend the oral consideration does not suspend the process of considering the complaint.

7. Oral hearing

1. The Committee shall be obliged to hold an oral hearing before making a decision.

2. Interested persons shall have the right to submit their own opinions or additional documents before the oral hearing.
3. The Committee shall be obliged to notify interested persons of the holding of an oral hearing 5 days before its holding.
4. The Committee may hear interested persons in their absence if this is necessary to prevent the disclosure of personal data or information classified as a commercial secret and if it is otherwise impossible to establish circumstances of essential importance to the case.

8. Review and decision of a complaint without an oral hearing

1. The Committee is authorized to review and decide a complaint without holding an oral hearing if:
 - a) there are grounds for refusing to review the complaint;
 - b) all interested parties participating in the complaint agree to review the case without holding an oral hearing.
2. The Committee is obliged to indicate the grounds for refusing to hold an oral hearing in the decision made regarding the complaint.

9. Committee decision on the complaint

1. When considering a complaint, the Committee shall examine all the circumstances relevant to the case and make a decision based on the assessment and reconciliation of these circumstances.
2. After considering the complaint, the Committee shall make the following recommendation decisions:
 - a) on the satisfaction of the complaint
 - b) on the refusal to satisfy the complaint
 - c) on the partial satisfaction of the complaint.
3. The Committee has the right to make a decision if all members of the Committee are present.
4. The Committee's decision shall be made by a simple majority of votes.
5. The recommendation decision on the satisfaction or partial satisfaction of the complaint shall indicate what measures the Committee considers appropriate to take.
6. The recommendation decision shall be submitted to the Executive Director for a final decision.
7. The decision of the Committee is not a binding document for the Executive Director.



This document was reviewed, adopted, and approved on [date] by the REC Caucasus Executive Body (Collegial Trio) in accordance with the organization's internal governance procedures, and shall enter into force as of the date of approval.

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