

Grievance Redress and Accountability Mechanism Partnership

FIT FOR PURPOSE GRMS –AN OVERVIEW OF DIFFERENT MODELS

April 27, 2021

Webinar hosted by the GCF's Independent Redress Mechanism

WELCOME & AGENDA



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Mechanism

Different options for structuring a GRM based on the effectiveness criteria for non-judicial under the Guiding Principles on Business and Human Rights

This session presents different options for structuring a GRM based on the different resources and capacities of the institutions, while still staying aligned with some of the key effectiveness criteria (legitimate, accessible, predictable, equitable, and continuous learning).

Paco Gimenez-Salinas, Independent Redress Mechanism of the Green Climate Fund

The Independent Complaints Mechanism (ICM) – Serving several European Development Finance Institutions

This session expands on the case of the Independent Complaint Mechanism of PROPARCO, DEG, and FMO. This provides an example of public institutions pooling their resources and sharing a common grievance mechanism.

Artraud Hartmann, Independent Expert Panel of the Independent Complaints Mechanism

Speak for Change. amfori Supply Chain Grievance Mechanism Programme.

This session presents the case of a private sector supply chain GRM working for multiple companies.

Charline Daelman, amfori

THE IRM – STRUCTURING A GRM BASED ON THE EFFECTIVENESS CRITERIA FOR NON-JUDICIAL



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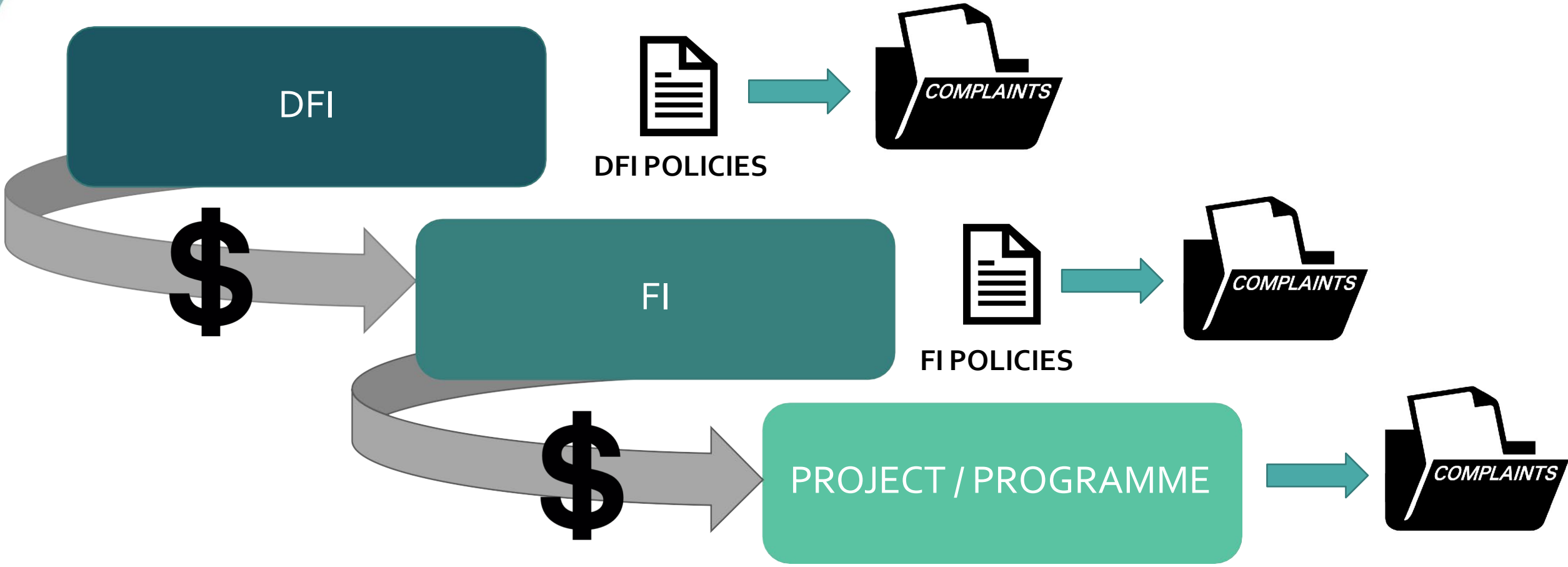
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ECOSYSTEM OF GRMS



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WHO DO I
SUBMIT MY
COMPLAINT TO?



FREEDOM OF CHOICE

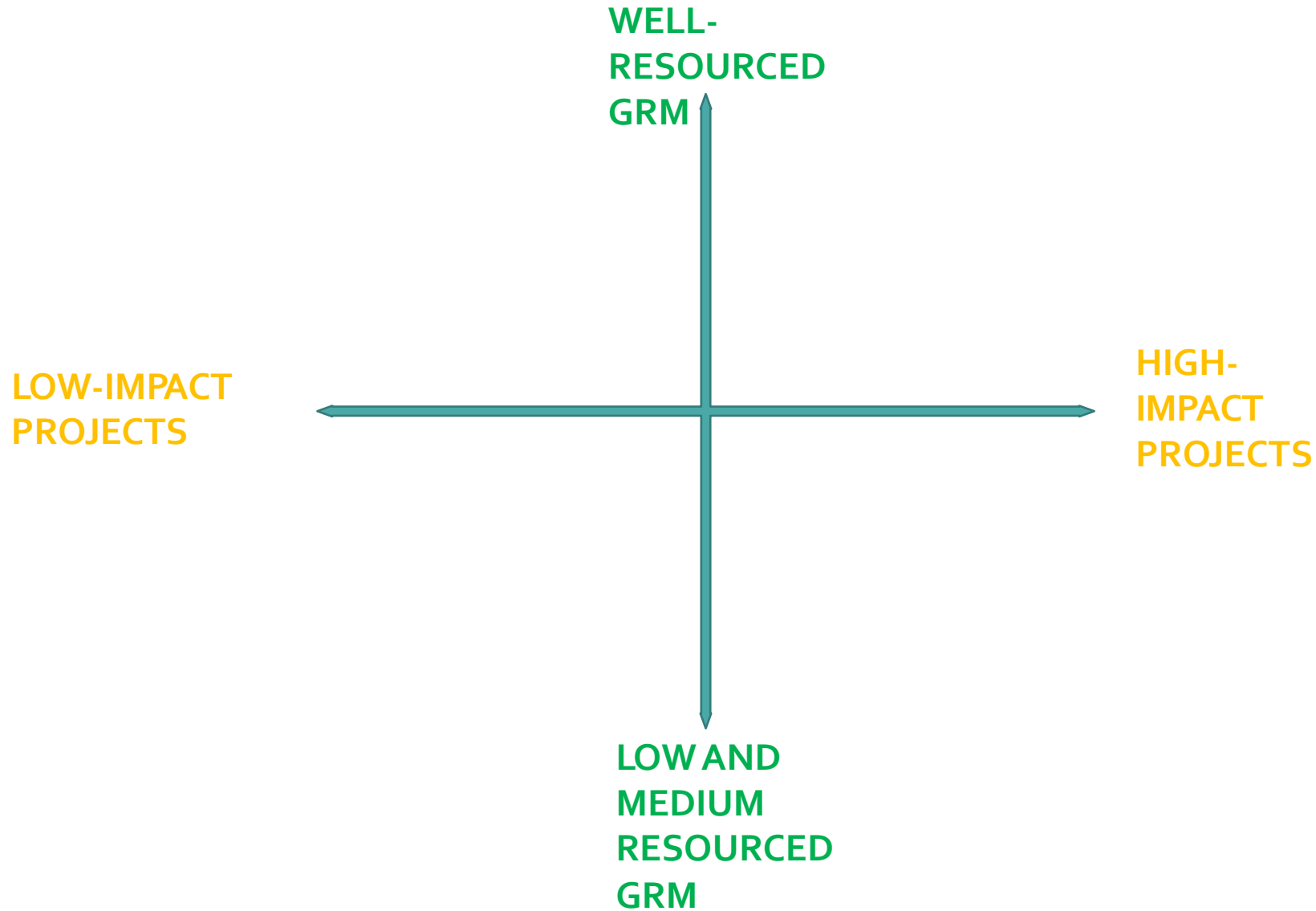
COOPERATION BETWEEN
MECHANISMS

DIFFERENT ALTERNATIVES FOR A LEGITIMATE GRM



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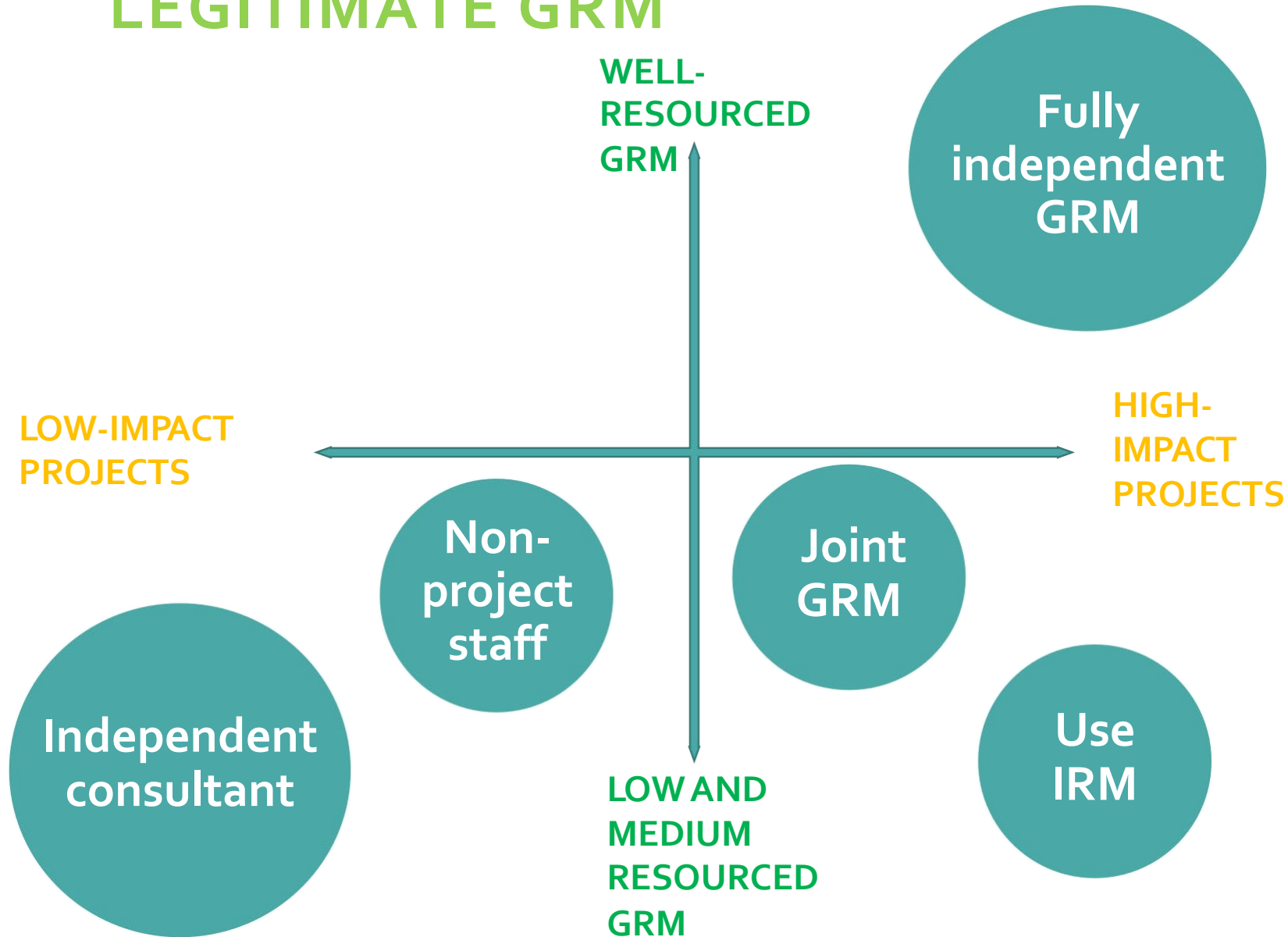


DIFFERENT ALTERNATIVES FOR A LEGITIMATE GRM



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DIFFERENT ALTERNATIVES FOR A LEGITIMATE GRM



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Form a
committee

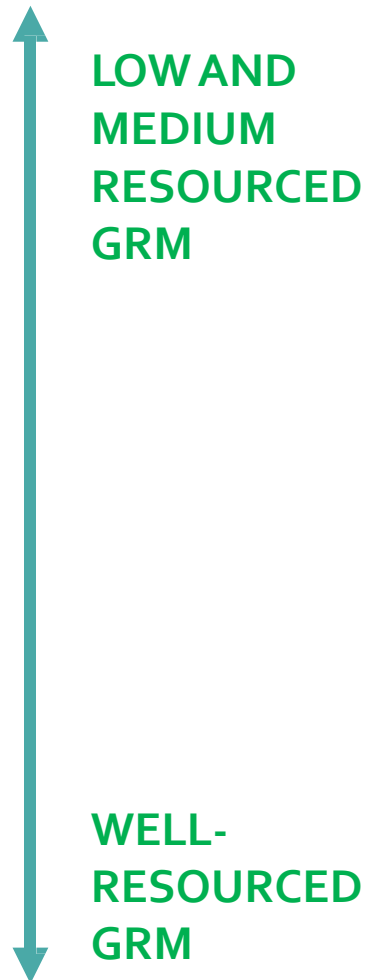
Closer to the
ground, less
independent

DIFFERENT ALTERNATIVES FOR AN ACCESSIBLE GRM



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Mechanism



LOW AND
MEDIUM
RESOURCED
GRM

- Publish GRM info – site & online



WELL-
RESOURCED
GRM

- Targeted outreach activities

DIFFERENT ALTERNATIVES FOR AN ACCESSIBLE GRM



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Redress
Mechanism

Defensive
implementing
partners

Communication
connection is a
new idea

DIFFERENT ALTERNATIVES FOR A TRANSPARENT GRM



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Mechanism

↑
LOW AND
MEDIUM
RESOURCED
GRM

- Regularly update complainants
- Publish complaints & outcomes
- Basic complaints register



↓
WELL-
RESOURCED
GRM

- Case Management System

DIFFERENT ALTERNATIVES FOR A TRANSPARENT GRM

Business
transparency
standards

Group
decisions less
risky

“Complete
transparency is
a dream”

Disclose
decisions w/o
detailed
evidence

DIFFERENT ALTERNATIVES FOR A SOURCE OF CONTINUOUS LEARNING GRM



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Redress
Mechanism



LOW AND
MEDIUM
RESOURCED
GRM

- Input on design
- Training with AE staff
- Provision on learning from cases
- Lessons learnt reporting from consultants
- Consult on GRM policy revisions



WELL-
RESOURCED
GRM

- Establish formal advisory function

DIFFERENT ALTERNATIVES FOR A SOURCE OF CONTINUOUS LEARNING GRM



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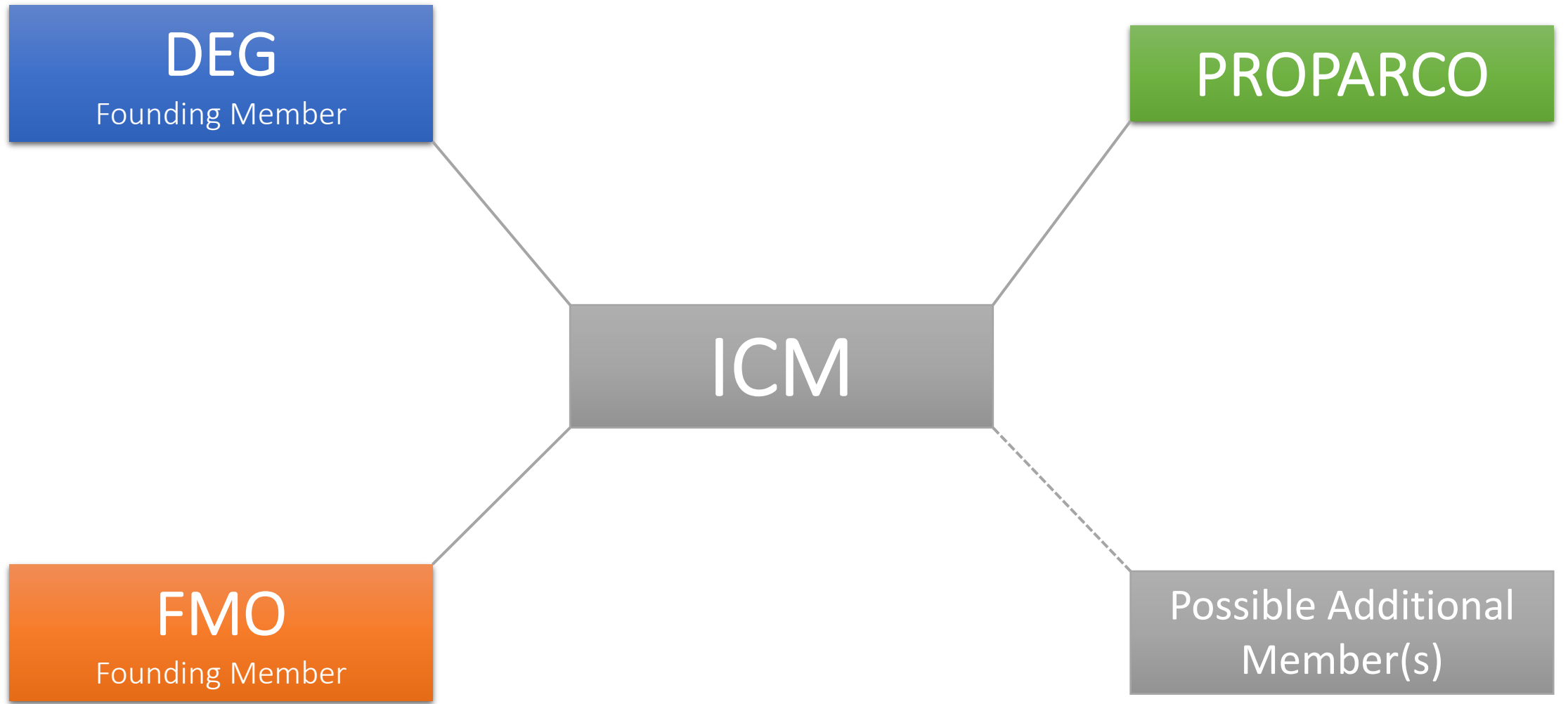
Independent
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Mechanism

Frame GRM as
learning
opportunity

The Independent Complaint Mechanism (ICM)

*Serving Several European
Development Finance Institutions*

GRAM Webinar 27 April 2021



The Three Participating Institutions

	Member Since
 DEG: German Development Finance Institution	2014
 FMO: Dutch Entrepreneurial Development Bank	2014
 PROPARCO: French Development Finance Institution	2018

All three development finance institutions (DFIs) lend to private sector investments or financial institutions in developing countries. All DFIs are fully in public ownership or have majority public shareholders.

Possibilities for other DFIs to Join the ICM

- Conditions for other DFIs to join the ICM:
 - The two founding institutions (FMO and DEG) have decision authority but would consult with all members.
 - New members would have to accept the existing ICM policy.
- There is significant interest in joining the framework but expansion has so far been constrained by capacity limitations of the ICM Panel.

Structure of ICM

- The ICM is governed by a **policy** which is issued by each member DFI separately, i.e. FMO-ICM policy, DEG-ICM policy, PROPARCO-ICM policy
- Core component is the three member **ICM Panel**
- Each DFI has a **complaint secretariat**: an FMO Secretariat, a DEG Secretariat, and a PROPARCO Secretariat
- Each DFI has its own **ICM website**.
- The ICM has a **common (secured) data space**.

ICM Policy: Modeled after the CAO Policy

- ***The ICM Policy has many similarities with the CAO Policy.***

- CAO is the complaint mechanism of the IFC.

→ Easy access for complainants

→ Dispute Resolution and Compliance Review Processes are offered

→ Broad Monitoring Function

→ Delegation of all decision-making authority to ICM Panel.

- DFI management or boards do not have decision-making power during the complaint processing.



Complaint Registration

by Secretariat

ICM Admissibility Assessment

ICM Preliminary Review

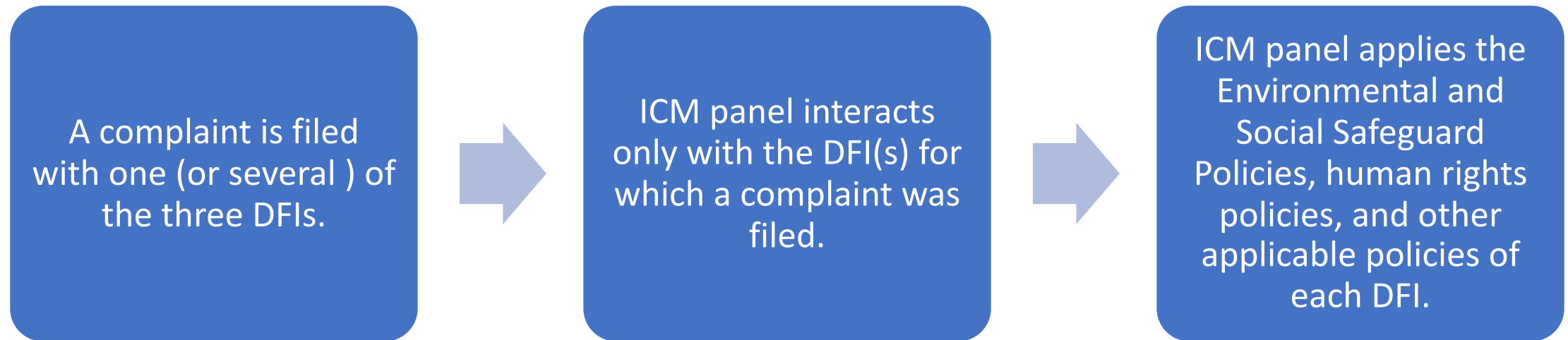
Dispute Resolution

Compliance Review

Monitoring

Monitoring

A Complaint is Filed With the Respective DFI



→ Policies are similar but not identical among the three DFIs.

Key Features to Make this Model a Success

Membership should be limited to similar institutions.

Buy in of all members to ICM Policy, ICM Mandate, and processes necessary.

Similarities in E&S and other applicable policies

Structured communication processes between ICM and secretariats and among secretariats

Joint data space

Strong degree of authority provided to ICM Panel

Panel members should have long tenures to establish consistent and predictable approaches.

Strengths of the ICM Model

Independence

ICM is highly independent, as the ICM Panel is outside of DFIs. This is seen as beneficial by stakeholders.

Credibility

Some Panel Members are well known in countries of DFIs, which provides credibility to ICM.

Flexibility and Cost-Effective

Panel Members are only paid when working on cases. Complaint secretariats have low fixed costs.

Complaint case load varies, and model can accommodate variations.

Growth Potential

The model could in principle serve more DFI members.

Disadvantages of the ICM Model

Capacity
Constraints

There are capacity constraints as Panel Members work part-time.

Difficult to
Expand

Model is designed to accommodate additional DFIs but with a capacity-constrained Panel, an expansion to more DFIs in the system is difficult.

Expansion would require more active support of secretariats, possibly by one joined secretariat rather than three separate secretariats.

Distance
from
Management

Distance of Panel from DFI Managements can be a disadvantage.



SPEAK FOR CHANGE

amfori Supply Chain Grievance Mechanism Programme

GRAM Webinar 27 April 2021

amfori Access to Remedy (A2R) Approach

amfori Access to Remedy Approach

amfori Grievance Mechanism

Offering amfori staff or other impacted stakeholders to submit any concern regarding the amfori workplace (internal) or services (external)



Operational Grievance Mechanisms

Strengthening Operational Grievance Mechanisms (OGMs) at production locations and farms through amfori BSCI and capacity building & training



amfori Supply Chain Grievance Mechanism

Supporting amfori members in providing access to remedy to workers and communities in their global supply chains, where grievances cannot or have not been addressed through local OGMs



A2R Hub

Encouraging the creation of a global Access to Remedy Hub managed by a neutral international organisation(s) with input from the global community to share, connect and collaborate, in order to maximise efforts



ACCESS TO REMEDY THROUGH COLLABORATION



SPEAK FOR CHANGE Programme

Why?



Better visibility into labour risks in members' supply chains



Actionable insights to de-risk operations and sourcing based on real time analytics



Compliance with existing and upcoming human rights due diligence legislation



Using joined leverage to resolve complaints in a cost efficient manner with support of amfori and independent third parties

Scope Speak for Change

The **Supply Chain Grievance Mechanism (SCGM)** aims to address grievances related to:

- the **amfori BSCI Code of Conduct**, which cannot or have not been addressed through the producer's operational grievance mechanism.
- the **amfori RPP during COVID-19 Guidelines**.

Grievances can be **submitted** by:




- Workers and their legitimate representatives;
- Trade unions and associations;
- Employers' organizations;
- NGOs;
- Communities; and
- Other parties such as importers and producers

SCGM Pilot: Launch May 2021 – Vietnam

How it works

SUBMIT GRIEVANCE

Stakeholder submits a complaint via accepted channels:

-  IVR (voice)
-  Web
-  Chat app

REVIEW & INVESTIGATE



amfori reviews the complaint and determines whether it falls within the programme scope



amfori shares with relevant members and coordinates alignment



amfori Members assign an independent investigator to determine if the complaint is grounded

COORDINATE REMEDIATION



amfori Members appoint an independent remediation partner to prepare and implement a remediation plan



amfori members can track high-level metrics on the software dashboards

Complainants, employers and amfori members can provide input throughout the process



Meet the technology partner

LEADER IN STAKEHOLDER VOICE TECHNOLOGY



Continuous | Anonymous | Multi-Channel | Multi Language | Chatbots

1.3+ million people reached
30 countries

- WhatsApp
- Email
- Voice Calls
- Facebook
- SMS
- Web
- OWL App
- OWL App



Characteristics of the Programme



Anonymous



Inclusive



Compliant with GDPR and existing/upcoming legislation



Scalable



Remedy-centered



Collaborative

Questions & answers

Thank you!