



# Protocol 7

## Grievance Redress Mechanism

Composed by Form international  
Last revised on April 2021  
Responsible: HR manager

Managing Director Form Ghana

A handwritten signature in blue ink, appearing to read "Willem Fourie", is written over a horizontal line. The signature is fluid and cursive.

Willem Fourie

## 1 Protocol purpose

This Grievance Redress mechanism describes the way Form Ghana manages complaints and conflict situations. The policy is aimed at preventing conflicts by investing in community sensitization and an open dialogue with all stakeholders.

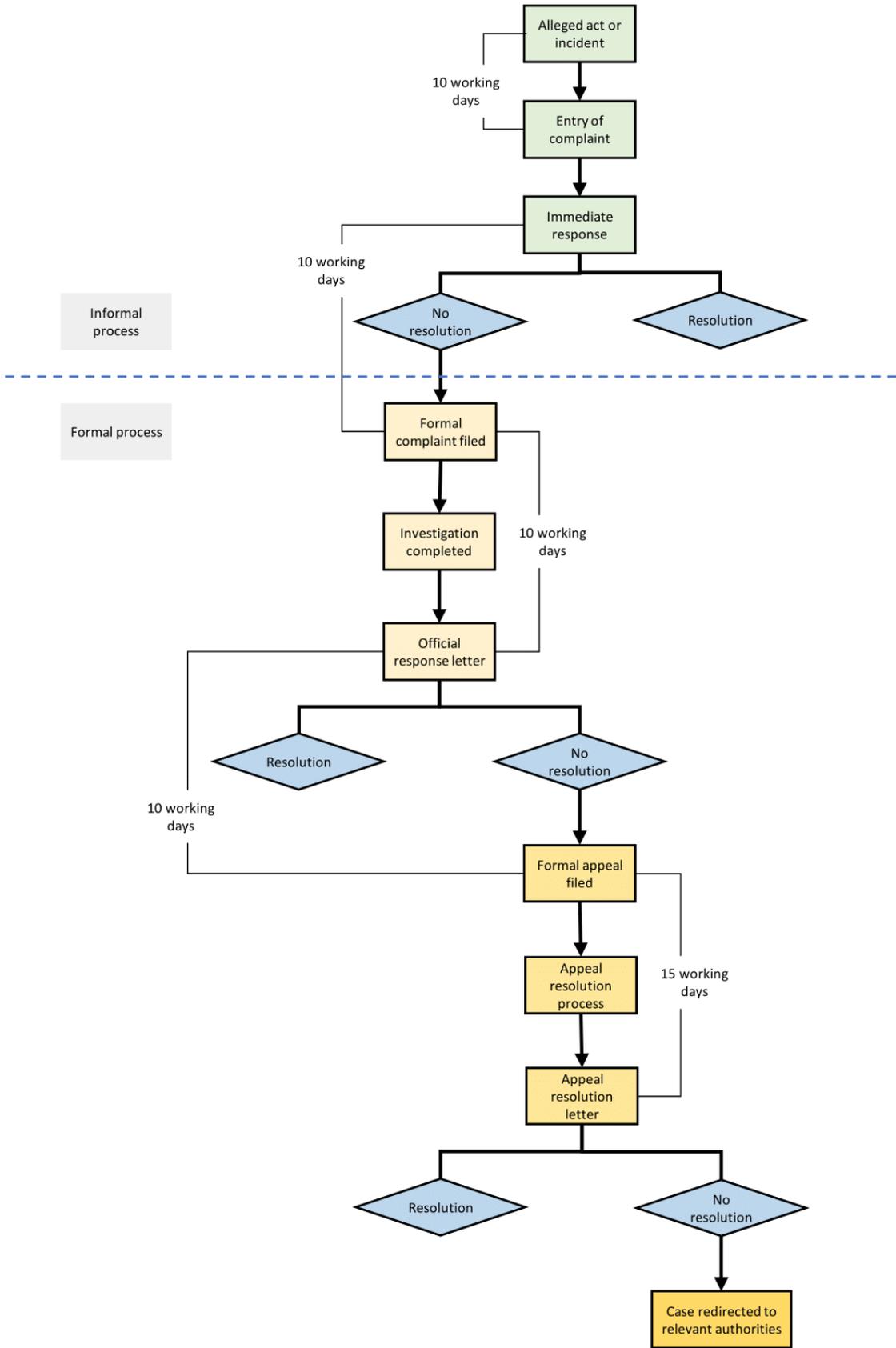
### ***Two-way communication***

The first part of the protocol (A) describes the situation in which a complaint directed to Form Ghana is reported by internal or external parties. The second part (B) describes the procedure that shall be followed in case Form Ghana wants to address a complaint or potential conflict situation towards external parties.

Updates in the GRM will be communicated through stakeholder meetings and included in the employees' training program. Furthermore, the protocol is published on the website of Form Ghana ([www.formghana.com](http://www.formghana.com); under 'downloads').

2 Part A: Complainant vs. Form Ghana

2.1 Process flow



The complaint procedure consists of an informal and formal part of the process. The formal process is documented in the complaints file. For all major incidents, the formal process is started immediately.

**Handling of complaints**

A professional approach is adopted in the handling of the complaint by a qualified HR Manager. All relevant parties will be heard in order to reach a consensus-based solution for the complaint. All communication between FG and the complainant in the formal process is recorded and filed. The complainant and other directly involved parties receive copies of the records and signs for receipt.

On each site, a Complaints Resolution Staff (CRS) has been appointed and trained in handling, registration of grievances and complaints, and follow-up including the respect of timelines. Specifically responsible are the HR Assistant and the Senior Site Manager. Besides the CRS and all senior staff have been trained in handling complaints.

**Overview of cases**

The company has a transparent **grievance registration system** in place that ensures equal handling of each complaint and enables the company to analyze and monitor complaints throughout the year.

A summary of the formally lodged complaints and their status is digitized and kept up-to-date by the CRS in an Excel file. An updated summary (digital file) is included in the monthly monitoring report that is submitted to FG management. The summary includes the following information:

- Case number
- Date filed
- Complainant
- Relation to FG
- Topic
- Status in the process flow
- Date of FG response
- Outcome / proposed solution
- Status (ongoing / resolved)
- Date complainant signed for closure of the case

Furthermore, the digital summary file will be analysed at least once every year and the outcomes will be discussed in a management meeting. Follow-up will be recorded.

**2.2 Entry of complaints**

**Internal complaints**

Form Ghana employees can inform the company about concerns directly, either in person or anonymously. Employees can turn to their immediate seniors or the CRS as the first point of entry in the complaints handling mechanism (table 1).

*Table 1. Entry points for grievances and/or complaints, per function.*

Company	Function	Entry point
Employees	Contractors	Team leaders Supervisors CRS
	Management trainees	Supervisors CRS
	Permanent staff junior (A-B1)	Supervisors

		CRS
	Permanent staff senior (B2-C4)	CRS
	Senior Management (C5-D)	HR Manager and Managing Director

**External complaints**

External complaints can have a variety of origins, and complainants can roughly be categorized as follows:

- Intercropping farmers
- Members of surrounding communities
- Pastoralists residing near the project area
- Government bodies (local, regional and national)
- Service providers
- NGOs
- Others

For each external complainant, a suitable contact point is available (table 2). For intercropping farmers, the main point of entry is the intercropping supervisor. For all other community members and pastoralists, the contact persons are the CRS (HR Assistant and Senior Site Manager). The contact persons are referred to as Complaints Resolution Staff, trained specifically in the handling of grievances and complaints.

Government bodies, service providers, and NGOs can file a complaint with the HR Manager. All other complaints will be handled by the HR Manager or HR Assistant, depending on the nature of the complaint and the complainant.

*Table 2. Entry points for grievances and/or complaints, per complainant group.*

Complainant	Entry point
Intercropping farmers	Intercropping supervisor
Community members	CRS
Pastoralists	CRS
Government	HR Manager and Managing Director
Service providers	HR Manager
NGOs	HR Manager and Managing Director

**Various ways to lodge a complaint**

In addition to the verbal transmission of complaints, there are other, anonymous ways to reach the company. Complaints filed through these channels are dealt with through the same process as the verbal complaints.

Employees can also choose to express their complaints at Workers’ Union meetings. A member of the CRS attends these meetings. If the complaint is not solved in the Workers’ Union meeting, the complaint can be taken to the CRS, and follow by the official GRM procedure.

Complainants with access to internet can choose for electronic submission of their grievance or complaint through the company website ([www.formghana.com](http://www.formghana.com)). Complainants can also reach the company via mail. The contact address is presented on the company website ([www.formghana.com](http://www.formghana.com)). Complaints received via mail or email are sent to the CRS.

The CRS member provides relevant information on the process to the complainant, including the time frame in which a response can be expected.

### **Anonymous complaints**

A suggestion box has been installed at the company office blocks, where employees and external people can file their complaints anonymously. The complaint should contain information on the relation of the complainant with Form Ghana (employee or external). In case the complaint is from an external, he/she should mention their community on the complaint. The suggestion box is emptied weekly by the designated CRS member on site. Anonymous complaints that have been filed through the suggestion box will be registered on a Grievance Registration Form, but are left without a signature.

### **Time frame for lodging a complaint**

In order to ensure an accurate follow-up, complaints must be lodged within 10 working days. Only in exceptional and justified circumstances, another timeframe will be accepted.

## **2.3 Immediate response**

At the first entry point, the complainant and the person receiving the complaint try to solve the complaint immediately. If a satisfactory solution is found at that stage, the case can be CLOSED. If no satisfactory solution is found, a formal complaint must be lodged within 10 working days.

## **2.4 Filing of a formal complaint**

Each formal complaint is registered on a Grievance Registration Form (Annex 1: Grievance Registration Form) by a member of the Complaints Resolution Staff (CRS). When a complaint is first registered, the case gets a case number: year-location-number. Both parties sign the form to confirm that the registration is correctly done and that the complainant understands and agrees with the registration. If applicable: the name, contact details, and address of the organization of the complainant will be kept in the file, but not published and treated with discretion.

Complaints received via mail or email will also be recorded on the grievance registration form. A copy of the GRM form will be sent to the complainant, as a confirmation of receipt. The complainant has to reply to express agreement on the registration (or sign a hard copy at the CRS / HR office).

Filing of a formal complaint is concluded when the complainant (or opponent) and Form Ghana representative have both signed the Grievance Registration Form. The case is always OPEN at this point.

## **2.5 Official response letter by CRS**

The CRS and designated staff gather information about the case and help determine whether and how the complaint might be resolved. If needed, the CRS can call for an investigation of the matter. This investigation is documented and kept in the complaints file as well. In case a complaint is lodged by a Form Ghana employee, FG management will decide whether the labour office should be involved as independent party.

The complainant will receive an official response letter within 10 working days after registration of the grievance, unless an extended period of time is agreed upon by both parties. This can only be done in exceptional and justified circumstances.

The response letter contains the decision taken by the CRS on behalf of the company, and the option to appeal against the decision. The CRS is responsible for informing the complainant of the full contents of the response letter.

A copy of the official response letter is kept in the complaint file.

#### **Official response to anonymous complaints**

- For anonymous complaints from employees, a written response is formulated by the CRS and is posted on the notice board within 10 workdays after registration. This procedure is displayed in the suggestion box.
- Official response letters to anonymous complaints from externals (intercroppers, community members) will be given to the community head by the FG-Intercropping Supervisor, with the request to communicate the content to the community members.

If the complainant is satisfied with the response, the matter is settled. The complainant shall sign for acceptance on the GRM-form and the case can be closed. In case of the involvement of external parties in the investigation and decision acceptance, they will also sign on the GRM-form.

If the complainant is not satisfied with the response, he/she can appeal against the decision. The appeal shall be submitted to the CRS within ten (10) working days after receiving the response letter, either in writing, using the standardized appeal form (Annex 2), or in person. If the appeal is done in person, the CRS will record the appeal. All appeal letters are filed in the complaints file.

*If no appeal form is received within 10 working days (after the date of the Official Response Letter), the case will be closed.*

## 2.6 Appeal & handling of the appeal

If the complainant did not agree with the solution proposed by the CRS in the official response, an appeal form has to be submitted to Form Ghana. The appeal form is added to the case-file, and taken to the HR Manager and/or Managing Director.

The HR Manager calls for a meeting with all relevant persons, including at a minimum the complainant and the Complaint Resolution Staff that recorded the complaint. Minutes of this meeting are recorded and documented in the second level complaints file, kept at the HR office.

Based on the meeting, the HR Manager assesses how to handle the complaint. He/she may call for an in-depth investigation, or another meeting. The following topics are included in the assessment:

- Identification of the parties involved
- Clarification of the issues and concerns raised by the complaint
- Gathering the views of other stakeholders, including those of the company
- Determining initial options that parties have considered and exploring various approaches for settlement

All results of the in-depth investigation are documented and stored in the complaints file.

In consultation with the complainant and all other parties involved, the HR Manager will come to a consensus-based solution within fifteen (15) working days from the date of the appeal.

If the case is complex and a resolution time frame cannot be met, an interim response is provided (oral and/or written) that informs the person of the delay, explain the reasons, and offers a revised date for the next steps.

If a decision has been reached, the HR Manager shall formally respond with a full explanation in writing to the complainant's appeal. (Appeal Resolution Letter). This letter includes follow-up actions if necessary, and timelines for implementation of the proposed solution. The Appeal Resolution Letter is filed in the complaints file.

If the complainant remains aggrieved, legal authorities must be consulted.

## 2.7 Implementation of proposed solution

Form Ghana will do what is agreed in the Appeal Resolution Letter, e.g. implementation of a proposed solution, within the given timeframes.

After implementation, final communication and evaluation take place with the complainant. After acceptance of the implemented solution, the complainant signs for closure of the case.

## 2.8 Legal authorities

If the company and the complainant cannot reach an agreement on the issue, the matter is re-directed to the relevant authorities. This may be the police, the Forestry Commission, the Labour Department, or the Court of Law for settlement at Conciliation or Arbitration level.

## **A. Form Ghana vs. opponent stakeholder (group)**

In case Form Ghana has a concern, experiences negative behavior, or potential conflicts with external parties, Form Ghana can start a dialogue, aiming at prevention or solution of the problem. The main difference with the GRM mechanism described in part A of this protocol is the party that takes the initiative to officially start a dialogue/negotiation.

Only the MD can start this procedure, e.g. based on observations or remarks made during meetings (stakeholder meetings). He can assign another staff member, e.g. plantation manager, to represent Form Ghana and handle the negotiations. If other staff should notice any reason to start an official procedure, this should be discussed with the MD, who will make a decision.

This part of the procedure applies only to external stakeholders, such as intercropping farmers, members of surrounding communities, pastoralists residing near the project area, Government bodies (local, regional and national), service providers, NGOs, or others.

### **Preparations:**

Define the complaint and opponent. It should be clear what the problem is before opening a case. Evidence (photos, letters, minutes) that illustrate the problem can be stored in the file.

The following steps shall be followed:

#### **Level 1. Entry & Registration**

First contact: Seeking contact with the relevant stakeholder, or stakeholder group. If the opponent stakeholders are a diffuse group of people, they should be asked to appoint a group representative (preferably a 'leader' who has the respect of his group members).

A case file shall be opened, using the GRM form. (opponents might not be willing to sign). The case is digitized in the GRM registration system.

**Level 2.** If a solution can be found straight away, this is recorded and if possible signed for acceptance by the stakeholder and the case can be closed.

#### **level 3. Official complaint letter by Form Ghana**

From the Form Ghana point of view, the issue should be formulated, and communicated with the stakeholder (Group). Explanation of the situation/problem, including reasons why this important to Form Ghana, possible consequences if not addressed, and possible solutions.

Refer to the official procedure, and explain.

Propose for a 1st meeting to discuss the topic.

Result: Form Ghana has communicated the complaint or potential conflict situation to the opponent stakeholder (group). Copies of letters and records are kept in the GRM file.

#### **Level 4. Appeal handling**

Necessary follow-up meetings are arranged by the appointed person (or MD). The opponent party will be heard in order to reach a consensus-based solution for the case.

If the solution acquires support from Form Ghana, conditions will be negotiated. All communication between FG and the complainant is recorded and filed.

The opponent stakeholder receives copies of the records (and signs for acceptance). In case the opponent stakeholder represents a group, he/she should be encouraged to communicate with other group members, to assure open dialogue with the whole group.

Once consensus is reached, this is recorded (include date, proposed solution, conditions, and timeframe). Both parties sign the consensus agreement and have a copy.

If the proposed solution needs time to be implemented, a timeframe is agreed, with several follow-up meetings to monitor implementation and compliance with the consensus agreement.

**Level 5.** Implementation of the proposed solution, within the given timeframe. After implementation, final communication and evaluation take place. If both parties are pleased with the situation, the case can be closed.

**Level 6.** If no consensus can be reached, the issue will be directed to the relevant (legal) authorities.



# Grievance Registration Form

Person recording:

Case number: .....-AKU- ...

Date .....

.....-BER- ...

- A. Complainant vs. Form Ghana\*
  - B. Form Ghana vs. opponent stakeholder(group)
- \*) *Tick the box that applies to the case*

## 1. ENTRY & REGISTRATION

### Complainant / Opponent

Name	
External (e.g. Community, Service provider, Government body, Pastoralist, NGO, intercropper) or Internal (Employee)	
Function	
Contact details complainant ( <i>ask the complainant how he/she can be reached</i> ):  Organization:  Address:  Phone:  E-mail:	

*If applicable: the name, contact details, and address of the organization of the complainant will be kept in the file, but not published and treated with discretion.*

### Complaint

Complaint subject (category)	
Complaint entry (suggestion box, verbal, email, other)	
Name of the person the complaint was first reported to	
Date complaint first reported	



Describe the immediate response given by FG

Since no agreement is reached immediately, the timeline for the Official response letter is:

- Within 10 working days (if possible), meaning before ...../...../.....[date]
- Extended period of time is agreed upon by both parties, meaning before ...../...../.....[date]

Justification for time extension:

Official Response letter

The response letter contains the decision taken by the CRS on behalf of the company, and the option to appeal against the decision. Summary of the decision of the CRS:

- The Official Response letter is communicated with the complainant on ..... / ..... / .....
- How was the Official Response letter communicated to the complainant?  
letter, notification on notice board, email, other: .....
- The full contents of the response letter have been explained to the complainant, on ..... / ..... / .....
- Copy of the Official Response letter has been filed at HR office. (Reference: ..... )

**Reply of the complainant:**

Is the complainant satisfied with the solution or not? Yes / No

Form Ghana and the complainant/opponent agree on the solution described in the Official Response Letter. After signature, the case will be closed. If no agreement is reached at this point, do not sign, but opt for appeal.		
Signature Complainant / Opponent for acceptance on the proposed solution:          Date:	Signature on behalf of Form Ghana  Name Form representative:       Date:	Where applicable, signature of 3 <sup>rd</sup> party involved  Name 3 <sup>rd</sup> party:       Date:

If the complainant is not satisfied with the response, he/she can appeal against the decision. The appeal shall be submitted to the CRS within ten (10) working days after receiving the response letter, either in writing, using the standardized appeal form (Annex 2), or in person.

*If no appeal form is received within 10 working days (after the date of the Official Response Letter), the case will be closed.*

## Appeal

- Appeal Form received on ...../..... / ..... [date]
- (Copy of Appeal Form) has been filed at HR office.

### Summary of the Appeal:

### Who should be involved in appeal handling:

- HR Manager and / or:
- MD

*The HR Manager calls for a meeting with all relevant persons, including at minimum the complainant and the Complaint Resolution Staff that recorded the complaint.*

Date 1<sup>st</sup> appeal - meeting: ..... / ..... / .....

- Minutes of this meeting are recorded and documented in complaints file, kept at the HR office. Reference: ....
  - Next step (recorded in minutes) defined:
    - in-depth investigation, or:
    - another meeting: proposed date 2<sup>nd</sup> appeal meeting: ..... / ..... / .....
  - Reference in-depth investigation recordings:
- Or:
- Minutes of the 2<sup>nd</sup> appeal meeting are recorded and documented in complaints file, kept at the HR office. Reference: ....

*The HR Manager will strive to come consensus-based solution within fifteen (15) working days from the date of the appeal. If a decision has been reached, the HR Manager shall formally respond with full explanation in writing to the complainant's appeal.*

- Appeal Resolution letter sent to complainant, on ..... / ..... / .....
- (Copy of) the Appeal Resolution letter has been filed at HR office. (Reference: ..... );

*If no consensus-based solution to the appeal is found:*

- interim response is provided (oral and/or written) that informs the person of the delay, explains the reasons, and offers a revised date for next steps.
- If the complainant remains aggrieved, legal authorities are consulted.

**Implementation of proposed solution**

*Form Ghana will do what is agreed in the Appeal Resolution Letter, e.g. implementation of proposed solution, within the given timeframes.  
 After implementation, final communication and evaluation takes place with the complainant.  
 After acceptance of the implemented solution, the complainant signs for closure of the case.*

- Evaluation with HR Manager and complainant on ..... / ..... / .....

Summary of evaluation meeting:

Form Ghana and the complainant / opponent have evaluated the case. The proposed solution has been implemented. After signature the case will be closed.		
Signature Complainant / Opponent for closure of the case:  Date:	Signature on behalf of Form Ghana  Name Form representative:  Date:	Where applicable, signature of 3 <sup>rd</sup> party involved  Name 3 <sup>rd</sup> party:  Date:

### Legal authorities

If the company and the complainant cannot reach an agreement on the issue, the matter is re-directed to the relevant authorities.

The case was re-directed to:

- the police
- the Forestry Commission,
- or the Court of Law

Date of re-direction: .... / ..... / .....