

Executive Board

136th Session Rome, 13-15 September 2022

Enhanced Complaints Procedure for alleged Non-Compliance with IFAD's Social, Environmental and Climate Assessment Procedures (SECAP)

Document: EB 2022/136/R.27

Agenda: 15(a)

Date: 4 August 2022
Distribution: Public
Original: English
FOR: APPROVAL

Action: The Executive Board is invited to approve the enhanced Complaints Procedure for Alleged Non-Compliance with IFAD's Social, Environmental and Climate Assessment Procedures (SECAP) as detailed in this document.

Technical questions:

Arundhati Inamdar Willetts

Lead Advisor, SECAP, Mainstreaming and Climate Tracking

Operational Policy and Results Division e-mail: a.inamdarwilletts@ifad.org

Audrey Hobbelen

Junior Professional Officer SECAP Compliance e-mail: a.hobbelen@ifad.org

Contents

Exe	ecutive summary	ii
I.	Introduction	1
II.	Overview of IFAD's Complaints Procedure	1
	A. Purpose and mandate	1
	B. Scope of application	2
	C. Institutional structure and functions	2
	D. Governance and accountability	3
	E. Budget and resources	3
III	. Eligibility and exclusion of complaints	4
IV.	Receipt of complaint, determination of eligibility and assessment phase	5
	A. Registration of the complaint	5
	B. Assessment phase	6
	C. Problem-solving process	6
	D. Impartial review process	7
	E. Monitoring of compliance	8
	F. Reporting and information disclosure	8
V.	Cofinanced projects	8
VI.	Retaliation	8
VII	.Outreach and training	9
VII	II.Privileges and immunities	9
Glo	scarv	10

Executive summary

- 1. IFAD requires all borrowers/recipients/partners to establish an easily accessible project-level grievance redress mechanism to receive and resolve concerns and complaints of people who believe they have been, or are likely to be, harmed by IFAD-financed projects/programmes. If the lead agency is not responsive to stakeholders' concerns, or if they fear retaliation, stakeholders may also raise their concerns directly to IFAD through its Complaints Procedure for Alleged Non-Compliance with IFAD's Social, Environmental and Climate Assessment Procedures (SECAP) (Complaints Procedure).
- 2. IFAD's Complaints Procedure first came into effect on 1 January 2015. Since then, IFAD received one complaint related to a cofinanced project in Armenia. Concurrently, while preparing IFAD's re-accreditation to the Green Climate Fund (GCF), it became evident that IFAD's Complaints Procedure would benefit from being aligned with international standards. Areas requiring improvement were identified as: levels of accessibility, transparency and independence; and clarity on roles and responsibilities within IFAD.
- 3. The following key changes are proposed to enhance the Complaints Procedure:
 - (a) The impartial review process (IRP) to be housed in the Office of Audit and Oversight instead of the Office of the President and Vice-President, and involvement of Audit Committee and Executive Board to enhance independence;
 - (b) Increased requirements for public disclosure of case summaries and reports to strengthen transparency;
 - (c) Clarified roles and responsibilities within IFAD to improve effectiveness; and
 - (d) Detailed guidance and requirements for cofinanced projects.
- 4. The enhanced Complaints Procedure covers alleged complaints of direct, material damage or loss that is, or is likely to be, suffered by complainants due to the failure of IFAD to comply with SECAP within the context of an IFAD-financed operation that applies the SECAP. The procedure does not apply to complaints related to sexual harassment, exploitation and abuse, fraud or corruption, or financial or administrative matters, which are dealt with through other existing mechanisms.
- 5. The procedure is organized in three steps. After each step, the case may be closed or forwarded to the next step. The assessment phase and problem-solving process are carried out by IFAD's Programme Management Department. Should the complaint not be resolved after these steps, it is escalated to the IRP. The IRP is carried out by an independent expert the SECAP complaints officer, appointed by the President in consultation with the Audit Committee and reporting to the Executive Board through the Audit Committee.
- 6. While it is not possible to predict how many complaints will be filed in any given year, an operational budget of US\$92,000 is proposed for the first full year of operations (2023). This estimation is based on the average budget of the accountability mechanisms of two partner organizations: one long-time established accountability mechanism (Inter-American Development Bank/Independent Consultation and Investigation Mechanism [MICI]) and one relatively new (GCF/Independent Redress Mechanism [IRM]).
- 7. To operationalize the enhanced Complaints Procedure, a change in the Audit Committee's Terms of Reference will be required to reflect new responsibilities.

Enhanced Complaints Procedure for alleged Non-Compliance with IFAD's Social, Environmental and Climate Assessment Procedures (SECAP)

I. Introduction

- 1. IFAD ensures that all IFAD financing is designed and implemented in accordance with its policies, standards, procedures and safeguards. The purpose of this document is to outline IFAD's enhanced Complaints Procedure for Alleged Non-Compliance with IFAD's Social, Environmental and Climate Assessment Procedures (SECAP) (Complaints Procedure).
- 2. The procedure covers the independent accountability mechanism (IAM) in place at IFAD to allow individuals and communities to contact IFAD directly and file a complaint if they believe they have suffered, or might suffer, harm as a consequence of non-compliance by IFAD with SECAP.
- 3. IFAD requires all borrowers/recipients/partners to adopt an easily accessible project-level grievance redress mechanism (GRM) to receive and resolve concerns and complaints from people who believe they have suffered, or might suffer, harm by IFAD-financed projects/programmes as a result of their failure to adhere to SECAP. Although stakeholders are encouraged to first raise their concerns with the lead agency or the project management unit (PMU)/project implementation unit (PIU), IFAD will ensure that the stakeholders are fully aware that they can also raise their concerns directly with IFAD if they believe that they have been, or are likely to be, adversely affected by an IFAD-supported project/programme, and have found the lead agency to be unresponsive to their concerns, or if they fear retaliation as a result of raising their concerns directly with the lead agency or PMU/PIU.
- 4. During the project/programme design and implementation process, IFAD will inform project stakeholders of SECAP and of IFAD's Complaints Procedure. The borrower/recipient/partner is responsible for informing people affected by the project of the existence and functioning of the procedure in an easily understandable form and language and for incorporating information about the procedure into the community engagement strategy.

II. Overview of IFAD's Complaints Procedure

A. Purpose and mandate

- 5. The purpose of this document is to: (i) set out the rules and processes applicable for the procedure; and (ii) ensure a clear entry point and transparent process for people and communities to raise complaints concerning IFAD-supported projects/programmes related to alleged non-compliance with its SECAP.
- 6. The procedure aims to:
 - (a) Enhance the social, environmental and climate outcomes of IFAD's projects/programmes or subprojects;
 - (b) Facilitate the resolution of complaints in a fair, independent, transparent, accessible and constructive manner;
 - (c) Reduce the risks of harm to people and the environment;
 - (d) Foster public accountability and transparency;
 - (e) Serve as a source of continuous institutional learning; and
 - (f) Improve design of projects/programmes, and of IFAD policies and procedures.

7. The procedure is neither a legal enforcement nor a judicial process mechanism. It serves as an avenue for addressing concerns, promoting a mutually constructive GRM between IFAD and the involved parties through a problem-solving process, as well as through an impartial review process. The procedure will help strengthen the implementation of SECAP.

B. Scope of application

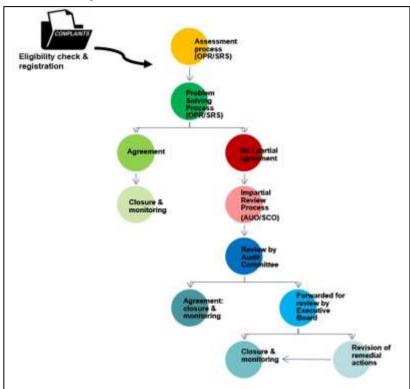
- 8. This procedure applies to all IFAD operations that are subject to the updated SECAP (2021), including all financing in IFAD's programme of loans and grants, non-sovereign operations, operations funded by supplementary funds where IFAD is the supervising entity, and reimbursable technical assistance. The procedure is complementary to the GRM.
- 9. In the case of cofinancing, clear arrangements will be agreed at the design phase to regulate the applicable IAM. These arrangements should be articulated in both the contractual agreement and the project implementation manual. A general approach for handling complaints arising in the context of cofinancing is set forth in section V.

C. Institutional structure and functions

- 10. The procedure is organized in three steps:
 - (a) Assessment phase. The SECAP redress service (SRS) serves as the single entry point at the corporate level to submit a complaint for alleged non-compliance with SECAP. The SRS is located within the Operational Policy and Results Division (OPR). The SRS screens and registers complaints, ensuring that any complaints related to corruption, procurement, or sexual harassment, exploitation and/or abuse are forwarded to, and processed by, the relevant department/unit within IFAD as described in paragraph 21 below. For eligible complaints, the SRS will carry out an assessment after the initial screening to gain an understanding of the issue(s) in preparation of the problem-solving process. In addition, the SRS will: (i) manage internal communication of the procedure; (ii) prepare annual reports and annual budgets for SRS and problem-solving process activities; and (iii) ensure that the procedure's public webpage is up to date.
 - (b) The problem-solving process (PSP) is carried out by the SRS within OPR. It aims to resolve issues raised about the social, environmental and climate impacts of projects/programmes through a neutral, transparent and collaborative problem-solving approach.
 - (c) The impartial review process (IRP) is carried out by the SECAP complaints officer (SCO), administratively housed within the Office of Audit and Oversight (AUO). The SCO carries out impartial reviews of IFAD's compliance with SECAP, assesses eventual harm done and recommends remedial actions where appropriate.

11. Figure 1 illustrates the steps of the procedure from receipt of the complaint to its closure.

Figure 1 Enhanced Complaints Procedure



D. Governance and accountability

- 12. The SRS is a unit within OPR. It is accountable to IFAD Management, and ultimately to the President.
- 13. The IRP is administratively housed in AUO and carried out by the SCO. The SCO is accountable and reports to the Executive Board through the Audit Committee. The Audit Committee oversees the IRP and holds the key responsibilities of:
 (i) overseeing the work of the SCO; (ii) considering the final impartial review report; and (iii) considering Management's proposed remedial action(s) based on the impartial review findings and recommendations from the SCO.
- 14. The SCO is appointed by the President, in consultation with the Audit Committee on a retainer contract, for a maximum period of 5 years. The selection process will be conducted with the assistance of the Human Resources Division in accordance with IFAD's policies and procedures. The contractual performance of the SCO will be monitored by AUO and any action for contract termination or non-renewal will be taken in consultation with the Audit Committee. To ensure impartiality, the SCO cannot not have worked for IFAD and cannot work for IFAD after this service is completed. To carry out the impartial review, the SCO will, with the approval of the Director AUO, hire one or two external consultants as appropriate for each complaint from a roster, based on the expertise required. These consultants will report to the SCO.

E. Budget and resources

15. Adequate budgetary support will be provided so that the procedure can be carried out in an effective, independent, and timely manner. While it is not possible to predict how many complaints will be filed in any given year, the table below provides a proposed budget based on the estimation of one case for the first (full) year of operation. For comparison purposes, the average budget lines of two other

development organizations have been added: one established accountability mechanism (Inter-American Development Bank [IDB]/Independent Consultation and Investigation Mechanism [MICI]) and one relatively new (Green Climate Fund [GCF]/Independent Redress Mechanism [IRM]).

Table 1
Proposed budget for first year of operation of Complaints Procedure (United States dollars)

	Average IDB/MICI 2018–2020 (average 22 cases/year)	Average GCF/IRM 2018–2020 (average 2 cases/year)	Proposed IFAD budget for 2023	
			34 500 ^a	(IRP)
Salaries	4 449 040	708 954	7 500 b	(SRS/PSP)
Complaints Management			20 000	(IRP)
and other	1 051 095	142 261	30 000 °	(SRS/PSP)
Total	5 500 135	851 215	54 500	(IRP)
			37 500	(SRS/PSP)
			92 000	

^a SCO: 30 working days (based on the United Nations Development Programme [UNDP] practice), at consultant cluster C fee rate (minimum 20 years' experience) + two consultants to support the SCO: 15 days each, at consultant cluster B fee rate (minimum 10 years' experience).

16. As shown in table 1, it is recommended that a budget of US\$92,000 be made available for the first full year of operation (2023). This budget will cover all costs to operationalize the Complaints Procedure including translation, fact-finding missions, communication material, training and costs for hiring consultants, but will not cover financial implications of any remedial actions that may need to be taken. The budget of the SRS and the PSP will be managed by the OPR while the budget for the IRP will be managed by the AUO.

III. Eligibility and exclusion of complaints

- 17. Complaints can be submitted in the language of the complainant(s) by letter, e-mail, and/or web form. Any communication thereafter will be in English with if applicable a translation in the language of the complainant. The processing of complaints not submitted in English may require additional time for translation purposes.
- 18. The complainant is requested to include the following information:
 - (a) Identification of the project/programme subject to the complaint(s);
 - (b) Clear description of alleged adverse impact(s) of the project and supporting evidence to the extent possible. This includes a description of the alleged harm;
 - (c) Name and contact details of the (representative of) the person(s) or community affected by the project and evidence of the authority to represent the complainant if applicable;
 - (d) Description of the complainant's reasons and efforts to address the problem with the GRM at the project level.
- 19. If the complainant(s) choose that their identity/identities be kept confidential, the request for confidentiality shall be submitted together with the complaint. If not specified, the SRS will ask the complainant(s) if confidentiality is requested.
- 20. When a complaint is received, SRS will first assess its admissibility. For the complaints to be considered, the following eligibility criteria must be met:

^b One consultant at cluster B fee rate for 15 days for PSP (minimum 10 years' experience).

^c Based on average costs for one case (potentially including translation, travel, etc.) plus other costs such as awareness-raising activities and capacity-building, divided between the SRS and the PSP (managed by OPR) and IRP (managed by AUO).

- (a) The complainant alleges that IFAD has failed to implement SECAP;
- (b) The complainant alleges that they have been or may be harmed by an IFAD-funded project/programme due to the failure of IFAD to comply with SECAP;
- (c) The complainant is a national or resident (or group thereof) of the project area. This criterion does not apply to a representative, provided there is written evidence of the authority to act on behalf of the complainant;
- (d) Complaints must relate to projects/programmes currently under design or implementation, or have been closed for a period less than 24 months; and
- (e) Complainants must have made a good faith effort to address the problem with the project-level GRM.
- 21. The following complaints will not be considered eligible:
 - (a) Complaints submitted more than 24 months after the project/programmes closing date;
 - (b) Matters not related to IFAD's actions or omissions in designing or implementing IFAD-supported projects/programmes;
 - (c) Matters already completed or considered ineligible by the procedure, unless complainants have new evidence previously not available to them and unless the subsequent complaint can be readily consolidated with the earlier complaint;
 - (d) Submissions from third parties who do not legally represent the complainant or who are anonymous;
 - (e) Matters related to the award of procurement contracts should be forwarded to the project procurement complaints mechanism. However, issues relating to SECAP non-compliance during contract implementation, including default on SECAP contract conditions are eligible for the procedure;
 - (f) Matters of finance and administration should be forwarded to and processed by the Financial Management Services Division of IFAD and the IFAD country team;
 - (g) Allegations of fraud and corruption in IFAD-supported projects/programmes should be dealt with through the existing procedures in PB/2018/07 and the Revised IFAD Policy on Preventing Fraud and Corruption in its Activities and Operations (2018). Complaints related to these matters are forwarded to and processed by the AUO;
 - (h) Allegations of sexual harassment or sexual exploitation and abuse should be dealt with through the <u>IFAD Policy on Preventing and Responding to Sexual</u> <u>Harassment, Sexual Exploitation and Abuse</u> and are forwarded to the Ethics Office in IFAD;
 - (i) Matters that are frivolous, malicious, trivial or generated to gain a competitive advantage.

IV. Receipt of complaint, determination of eligibility and assessment phase

A. Registration of the complaint

22. After receipt of a complaint, the SRS will send the complainant an acknowledgement of receipt informing the complainant of the date by which IFAD will determine the eligibility of the complaint, and whether additional information is required.

23. The SRS will establish the eligibility of the complaint based on the criteria defined in paragraphs 20 and 21 above. Further information for clarification may be requested from the complainant and/or the relevant regional division. The complainant will receive a notice with information on the next steps and the complaint will be registered.

B. Assessment phase

- 24. Once a complaint is deemed eligible and registered as such, the SRS will initiate the assessment process. During this phase, the SRS will carry out an assessment of the complaint to:
 - (a) Develop a thorough understanding of the issues and concerns raised;
 - (b) Consult with the senior procurement officer or a project procurement staff member to verify if the alleged non-compliance is due to a procurement issue;
 - (c) Engage with the country director and the project delivery team;
 - (d) Engage with the complainant, the borrower/recipient/partner, and the PMU;
 - (e) Identify local communities and additional stakeholders as relevant; and
 - (f) If deemed necessary, the SRS may recommend to IFAD Management that the relevant project/programme's activities be suspended pending resolution of the complaint.
- 25. The assessment process provides the complainants, the borrowers/recipients/partners, and the project delivery team an opportunity to raise questions and consult with the SRS to facilitate informed decision making and understanding of the procedure.
- 26. At the end of the assessment phase, the complainant may decide whether: (i) the issues raised by the complainant can be addressed by the SRS in a satisfactory way or, (ii) to proceed with the PSP. If the involved parties agree to the PSP, the SRS will facilitate this. If at the end of the PSP there is no or only a partial agreement, the complaint will be forwarded to the IRP, should the complainant choose to do so. The complainant may, at any time, decide to withdraw from the process altogether. In all cases, the SRS shall register the complaint, prepare a report to IFAD Management and disclose the outcomes of the assessment to the public after consultations with the complainants.
- 27. The draft assessment report should be prepared by the SRS and include:
 - (a) A summary of the information gathered and parties' perspectives of the issues raised;
 - (b) An action plan with timeframe for implementation, and appointment of a mediator if relevant;
 - (c) A copy of the responses from the complainant (anonymized if necessary) and from the borrowers/recipients/partners.
- 28. The draft assessment report will be shared with all parties. The report will incorporate any comments received and will be uploaded in the complaints registry.

C. Problem-solving process

29. If the complaint is not successfully addressed in the assessment phase, the SRS will facilitate the resolution of any social, environmental or climate harm caused by the project through a neutral, transparent, collaborative and constructive problemsolving approach. The PSP may involve: (a) facilitation and information sharing; (b) fact-finding missions or site visits; (c) mediation.

- 30. The mediation approach envisaged above is led by a mediator who is approved by all parties and conducts the process in a manner acceptable to all parties and treats all participants fairly and equitably.
- 31. Engagement in the PSP is voluntary and requires agreement between the complainants and the borrowers/recipients/partners. Each party keeps the right to exit at any point of the process, in which case the complainants may decide to request forwarding the complaint to the IRP.
- 32. Any agreement reached following the PSP should be specific in terms of objective, nature and requirements. It must be clearly documented and timelines must be stipulated. In pursuit of a solution, IFAD will not support agreements that involve coercion, are contrary to IFAD policies or violate applicable domestic or international law.
- 33. Where an agreement is reached, the SRS will post the agreement on the website, and monitor the implementation of the agreement and share interim updates with the parties involved. When no agreement, or only partial agreement, is reached, the SRS will verify whether the complainant would like to transfer the complaint to the IRP.

D. Impartial review process

- 34. If no agreement or only partial agreement is reached with the complainant during the PSP, the complainant may request referral to the IRP. In this case, the SRS will forward the complaint the SCO to initiate the IRP.
- 35. The SCO will engage in the following activities:
 - (a) Prepare the terms of reference for the impartial review;
 - (b) Engage with relevant parties and stakeholders;
 - (c) Conduct a thorough and objective impartial review;
 - (d) In the case of cofinancing project, coordinate with the IAMs of other cofinancing institutions;
 - (e) Issue the draft review for comment to the complainant, the borrowers/recipients/partners, IFAD Management, and the regional division concerned;
 - (f) Issue the final impartial review report to be considered by the Audit Committee;
 - (g) Coordinate with IFAD Management and with the regional division on proposed remedial actions to bring the project into compliance; and
 - (h) Monitor the implementation of proposed remedial actions.
- 36. The draft impartial review report will be prepared by the SCO and consultants, and will include the findings and recommendations for specific actions in case of non-compliance.
- 37. The SCO will send the draft report to IFAD Management, the complainant, and the borrowers/recipients/partners for review.
- 38. The SCO will consider the responses and make necessary changes to finalize the report. The final impartial review report, redacted as appropriate to safeguard sensitive information, will be posted to the restricted section of the Member States Interactive Platform for consideration by the Audit Committee during its next scheduled meeting. Management will prepare a response to these recommendations by submitting an action plan with proposed mitigation measures to be added to the final impartial review report. Management will endeavour to obtain agreement on the action plan from the borrowers/recipients/partners. The Audit Committee will review the report and determine whether the recommendations of the SCO have

- been adequately incorporated into the action plan, and report to the Executive Board on any issues that require its attention. For that purpose the Audit Committee may request that the SCO present the findings of the final impartial review report to the Executive Board for information and appropriate action.
- 39. After consideration by the Audit Committee and/or by the Executive Board, the final impartial review report, including the responses from the complainants, borrowers/recipients/partners and IFAD Management, also redacted as appropriate, will be released to the parties involved. A summary of the report prepared by the SCO and consultants shall be published on the IFAD website. There shall be no right of appeal and/or review by the complainants and/or other parties regarding the decisions described in the final impartial review report.

E. Monitoring of compliance

40. The SCO together with consultants will monitor the implementation of the action plan periodically and at least annually, until the remedial actions are fulfilled to ensure compliance with SECAP. The monitoring period will vary depending on the complexity of the action plan but cannot exceed three years. In its annual report, the SCO will report to the Audit Committee on the implementation of the remedial actions and on progress to bring the project into compliance. A final monitoring report will conclude the compliance review process.

F. Reporting and information disclosure

- 41. The SRS and the SCO will prepare an annual report describing the procedure's activities during the previous year, including a description of all complaints received, a summary of closed complaints, follow-up actions and recommendations, lessons learned, trends, and systemic issues, and provide recommendations on preventing similar non-compliance. The annual report will be sent to the Audit Committee for information.
- 42. The SRS will maintain a public webpage where it will describe the procedure in IFAD's official languages, disseminate the annual report and other publications relevant to its work such as brochures, case studies and best practices.
- 43. In addition, IFAD will publish a complaints registry.

V. Cofinanced projects

- 44. For cofinanced projects, IFAD will agree on a common approach to receiving, resolving and reporting complaints, which will be reflected in the financing agreement and project implementation manual.
- 45. The agreements between IFAD and the cofinancing institutions shall describe proper protocols to address the joint processing of complaints, including: a robust mechanism for receiving and addressing complaints, the confidentiality of the complainants, joint work plans, retention of consultants, findings of the consultant's review, a retaliation risk assessment, any mitigation measures, and budgetary and resources implications.

VI. Retaliation

- 46. The key principle underlying the procedure is that every individual or group has the right to voice their criticisms or file complaints in relation to an IFAD-supported project/programme without threats to their safety or fear of retaliation. IFAD expects its partners not to threaten or harm stakeholders who criticise an IFAD-supported project/programme or file a complaint.
- 47. In accordance with IFAD's Whistleblower Protection Procedures, any retaliatory behaviour by IFAD personnel against an external party engaged in any dealings with IFAD because such person has reported unsatisfactory conduct and/or misconduct, will in turn be considered unsatisfactory conduct or misconduct.

VII. Outreach and training

48. The SRS will conduct outreach activities to external stakeholders to enhance the accessibility of the procedure.

VIII. Privileges and immunities

- 49. The PSP and the IRP are administrative in nature. In all cases, the Executive Board has the ultimate decision-making authority on responses to complaints. The PSP and the IRP only have a mandate to assess allegations of IFAD's non-compliance with SECAP in IFAD-financed operations. They do not have a mandate to investigate actions of governments, public entities, local authorities, borrowers, executing agencies or other lenders, sponsors, or investors in connection with the IFAD-financed operation.
- 50. Complaint reviews do not create any legally enforceable rights for complainants, nor any liabilities for IFAD. Any aspect of the handling of complaints under this mechanism is without prejudice to the privileges and immunities of IFAD and is not open to review by any court of law.

Glossary

Assessment: Initial phase of the Complaints Procedure to assess whether there is prima facie evidence that the complainants have been or may be adversely impacted by an IFAD-funded project or programme, as a result of non-compliance with IFAD's SECAP.

Audit Committee: The Audit Committee of IFAD's Executive Board oversees the impartial review process and the work of the SECAP complaints officer. It holds key responsibilities concerning the independent review process: (i) considering the final impartial review report; (ii) considering Management's proposed remedial action(s) based on the impartial review findings and recommendations from the SECAP complaints officer; and (iii) recommending whether or not the final impartial review report should be submitted to the Executive Board.

Borrower/recipient/partner: Party that receives financing in connection with an IFAD-financed project or programme and has entered into a financing agreement with IFAD.

Cofinanced project: An IFAD-financed project or programme receiving cofinancing from a partner.

Complainant: Individual or group of individuals identified as participating in the compliance procedure process who believe that they have suffered or may suffer harm as a result of an IFAD-funded project due to the failure of IFAD to comply with SECAP.

Complaint: An issue, concern, problem, grievance or claim (perceived or actual) raised by a complainant with the aim of having IFAD address the issue. Complaints can be submitted by two individuals or by a group (individuals, an organization, association or community) who are nationals of the country concerned and/or who reside in the project area, or a representative, provided that the representative indicates on whose behalf they are acting and provides written evidence of the authority to represent them.

Complaints Procedure: The procedure detailed in this document to enable a complainant to raise a complaint concerning an IFAD-funded project and IFAD to address this complaint.

Executive Board: IFAD's second governing body, consisting of 18 elected members and 18 alternate members, and chaired by the President of IFAD. The Board acts as the ultimate authority in the Complaints Procedure.

Harm: Any direct, material damage or loss (actual or likely) that is suffered by complainants due to the failure of IFAD to comply with SECAP within the context of an IFAD-financed operation.

Impartial review process (IRP): The process of carrying out independent reviews of IFAD's compliance with its SECAP and other related policies, assess harm done, and of recommending remedial actions, where appropriate.

Lead agency: Government, inter-governmental or non-governmental organization responsible for the execution and implementation of an IFAD project/programme.

Mediator: Expert appointed by IFAD to assist the problem-solving process.

Management: Manager or managers responsible for the relevant IFAD-financed project/programme or any delegate thereof.

Parties: Complainant(s), their representatives, if any, and the borrower(s)/recipient(s)/partner(s).

President: The President of IFAD.

Problem-solving process (PSP): The process to help resolve issues raised about the social, environmental, and climate impacts of projects through a neutral, transparent, and collaborative approach and to contribute to improving project outcomes.

Project-level grievance redress mechanism: The mechanism to address social, environmental, and climate performance at the project level. It usually serves as the first entry point for complainants.

Remedial actions: Actions taken by IFAD, and assisted by independent experts if required, to bring the project into compliance with SECAP and to address the harm caused by the project.

Social, Environmental and Climate Assessment Procedures (SECAP): IFAD's procedures for managing risks and impacts, and integrating mainstreaming priorities into new IFAD-supported investments. They first came into effect on 1 January 2015 and were updated in 2017 and 2021. For the purposes of this procedure, SECAP refers to the updated SECAP, which applies to all new concept notes (or equivalent) submitted to the Operational Strategy and Policy Guidance Committee (OSC) on or after 1 September 2021.

SECAP complaints officer (SCO): Independent expert appointed to carry out the IRP.

SECAP redress service (SRS): Unit located in the Operational Policy and Results Division, which serves as the entry point for people and communities affected by a project to file their complaints with IFAD, registers the complaints, screens them against eligibility criteria and assesses them. In addition, the SRS manages internal and external communication on the Complaints Procedure, prepares annual reports and budgets for the SRS and PSP activities, and maintains the public webpage on the procedure.