



OBSERVATOIRE DU SAHARA ET DU SAHEL
SAHARA AND SAHEL OBSERVATORY

External Communication Procedure

June 2017



External Communication procedure

1. SUBJECT

The Sahara and Sahel Observatory (OSS) recognizes the importance of and reaffirms its commitment to transparency in all aspects of its activities. Through the implementation of its External Communication procedure, the OSS recognizes the need to ensure public access and stakeholder participation in achieving its mandate. Based on this procedure OSS will ensure the greatest degree of transparency in all its activities through the effective dissemination of information to stakeholders and the public at large.

The main objective of this procedure is to provide a methodology to be applied directly by OSS and/or by executing entities before and during projects implementation.

This document sets out the procedure of the OSS regarding the information that it makes available to the public either as a routine matter or upon request.

This procedure applies to all information produced by or in the possession of the OSS and related to its projects and programs implementation.

2. SCOPE OF APPLICATION

The procedure aims to disclose information related to environmental and social reports and assessments, as well as requirements related to environmental and social risk categories.

This procedure applies to all projects implemented by OSS or Executing Entities, and categorized under B or C risk. This procedure defines disclosure timelines depending on the project's environmental and social risk category, and also includes communication channels to be used.

3. REFERENCE DOCUMENTS

The elaboration of this procedure is based on the following documents:

- Internal regulations, March 2000 version 1.0
- OSS Procedures Manual, April 2012 version 1.0
- Environmental and Social Policy, April 2016 version 1.0
- Procedure for the identification of environmental & social risks and impacts and categorization of projects/programmes, April 2016 version 1.0
- Whistleblowing policy, March 2013 version 1.0
- Arbitration procedure, April 2016 version 1.0



4. CONTENT

The external communication procedure covers the following aspects:

- Project presentation
- Project benefits for communities and local population
- Dissemination of environmental and impact assessment results
- Dissemination of environmental and social risks encountered by beneficiaries
- Dissemination of the project's mitigation measures
- Presentation of channels and timelines
- Complaint, Appeal and grievance possibility, methods and means

As an overall objective the external communication procedure allows the entity to:

- Receive and register external communications from the public;
- Screen and assess issues raised and determine how to address them;
- Provide, track, and document responses.

5. EXCEPTIONS FOR EXTERNAL COMMUNICATION

While the OSS is committed to disclosing as much information as possible, the effective functioning of the OSS requires it to protect certain types of information by identifying the harm that disclosure of the relevant information could cause.

The OSS will not disclose information relating to: (i) personal information of any person, including members and alternate members of the Executive Board, the Executive Secretary, advisors, OSS staff and consultants and other persons from financial partners; and (ii) Staff appointment and selection processes.


The procedure should ensure the confidentiality of applications and any document, information or data received by OSS.

6. MAIN BENEFICIARIES

The External communication procedure will target all the involved institutions, organizations, local communities, private sector, Civil Society Organizations etc, in projects and programs implemented by OSS. This procedure guarantees an ascending and descending wide way of communication.

7. MAIN STEPS

The External communication procedure consists of 4 major steps. The flow diagrams and descriptive tables developed below show the different stages of external communication for Category B and C projects as well as the deadlines for dissemination, objection and complaint.

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The text below sets out the main components of the procedure.

1 - Project information disclosure:

The OSS and the project or program executing entity publish an information note on the project detailing the following aspects:

- The main objective of the project
- The project planned activities
- The results of the environmental and social assessment
- The main risks incurred by beneficiaries
- The mitigation measures planned to avoid and/or minimize risks

In this project information note it is important to point out that the OSS and the Executing Entities offer the possibility to file a complaint in case of project-related harm.

The project information note shall be shared and disseminated via the communication channels available, such as:

- OSS's website,
- Executing Entities website,
- Project / program partners' websites,
- Radios,
- Flyers, sheets, announcement,
- Local press,
- Etc.


This procedure provides the possibility to tackle the above mentioned information during information, preparatory and launch workshops. This step is only required for projects under B Category risk.

2 – Complaint:

In case it is noted the project is prejudicial to a person, organization or entity, it is possible to file a complaint or request further information about the project.

The complaint or request for information may be submitted or deposited to the OSS or to the executing entity responsible of the project.

A complaint form is developed and available on the OSS's website and can be shared with the executing entity.

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3 – Screening and assessing issues raised:

Once received, the complaint or request for information is submitted to OSS or to the Executing Entity who proceeds with the screening and assessment of the raised issue.

The Environmental and Social committee is the entity responsible for screening and assessing the raised issue and then decides of the relevance of any complaint.

The executing entity is also responsible for a first global assessment of the complaints or issues raised and submitted to its interest. After this first assessment the complaint is submitted to OSS through Environmental and Social committee who will manage the issue (Cf. Flow Diagram).

This step almost consists in analyzing, categorizing and registering complaints before addressing the raised issue.

4 – Addressing issues raised:

After processing and reviewing the raised issue by the specialized committee, the president of the Environmental and Social Committee with the upper arbitration committee¹ Committees with expert/Environmental impact assessment office decides of the final decision to address the complaint or the raised issue.

For the most complex cases, OSS may call out an expert consultant or an environmental impact assessment office.

The main possible remedies or activities that could be recommended by the Environmental and Social Committee consist in verifying if mitigation actions are sufficient and well-applied and/or proposing alternative and more suitable mitigation actions.

5 – Registration and publication:

The final decision shall be publically shared in compliance with OSS equity and transparency policies. The complainant has to possibility to file an appeal with regard to the final decision to OSS, Executing entity or donors and national/international instances.

¹ Upper Arbitration Committee in composed by : OSS Executive Secretary and the Environmental and Social Committee and could be reinforced by an external expert/consultant

FLOW DIAGRAM FOR CATEGORY B PROJECTS

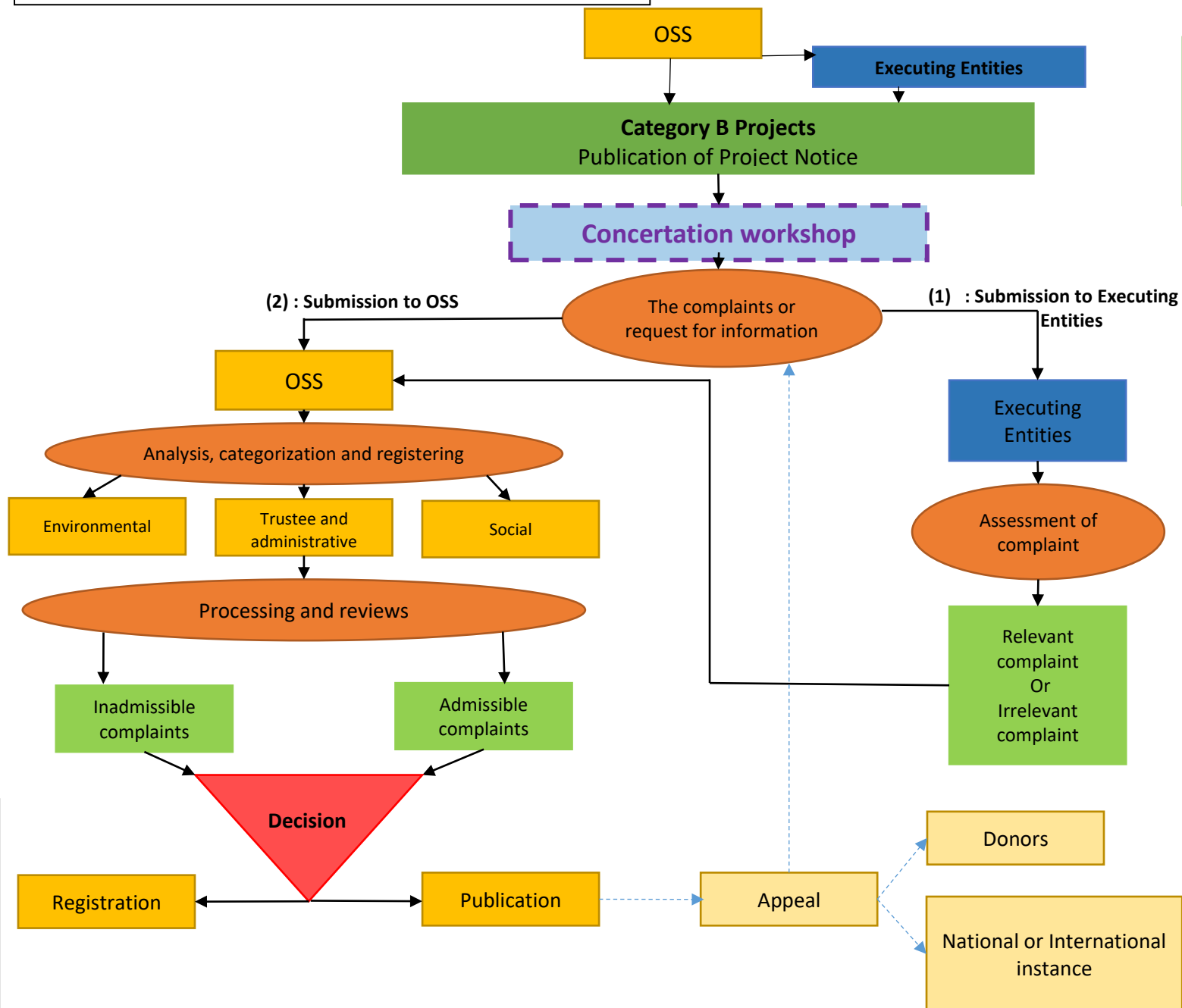
The
Environmental &
Social Committee
president
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Boulevard du Leader
Yasser Arafat,
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Environmental & Social
Committee

The specialized
Committee

The president of the
Environmental and
Social Committee

The upper arbitration
committee Committees
with
expert/Environmental
impact assessment
office



Project
Information
disclosure

Complaint

Screening
and
assessing
issues raised

Addressing
issues raised



External communication steps for Category B projects

WHAT	HOW	WHO	WHEN
Project information complaint			
STEP 1: Publication of project information notice	<ul style="list-style-type: none"> - OSS's website; - Executing entities' website; - Partner's website - Radio announcement 	<ul style="list-style-type: none"> - OSS - Executing entities 	4 weeks before the workshop
STEP 2: Organization of the concertation workshop	<ul style="list-style-type: none"> - Meeting; - Presentation of the project objective and activities; - Presentation of the environmental and social impacts - Presentation of the mitigation actions - Discussions with stakeholders 	<ul style="list-style-type: none"> - Executing entities 	
Complaint			
STEP 3: Complaint filing	<ul style="list-style-type: none"> - Fill out the complaint form 	<ul style="list-style-type: none"> - Project partners - Local population - CSO - Third parties 	45 days after the workshop
Complaint submitted to Executing Entity			
STEP 4: Receipt of complaint	<ul style="list-style-type: none"> - Receiving an email - Postal service - Hand delivery 	<ul style="list-style-type: none"> - The representative of executing entities 	During the 45 days after the workshop
STEP 5: Assessment of complaints	<ul style="list-style-type: none"> - Complaint relevance assessment - Decision submission to OSS 	<ul style="list-style-type: none"> - The representative of executing entities 	Within 10 working days
Complaint submitted to OSS			
STEP 4': Receipt of complaint direct from public	<ul style="list-style-type: none"> - Receiving an email: doleances@oss.org.tn - Postal service - Hand delivery (Boulevard du Leader Yasser Arafat, PoB 31, Tunis 1080, Tunisia) 	<ul style="list-style-type: none"> - The president of the Environmental and Social Committee - OSS Secretariat 	During the 45 days after the workshop
STEP 5': Receipt of complaint from Executing entity after first assessment	<ul style="list-style-type: none"> - Receiving an email: doleances@oss.org.tn - Postal service - Hand delivery (Boulevard du Leader Yasser Arafat, PoB 31, Tunis 1080, Tunisia) 	<ul style="list-style-type: none"> - The president of the Environmental and Social Committee - OSS Secretariat 	Within 10 working days after the 45 days following the workshop
OSS Screening and Assessing issues raised			
STEP 6: Analysis, categorization and registering complaints	<ul style="list-style-type: none"> - Registration 	The Environmental and Social Committee	Within 7 working days

		<ul style="list-style-type: none"> - Documentations (Project location, nature of infringement, documents or other evidence, name and address of the complainant, reasoned opinion) - Risk screening - Evidence - Compliance with the reference documents 		
STEP 7:	Complaint processing/Environment	<ul style="list-style-type: none"> - Assessment of environmental risks and compliance with the E&S Policy - Assessment of Environmental Impact studies - Evaluation of mitigation actions relevance - Update of mitigation actions planned 	The specialized committee / Environment	Within 15 working days
	Complaint processing / Trustee and administrative	<ul style="list-style-type: none"> - Whistleblowing procedure 	The specialized committee / Trustee and administrative	Within 15 working days
	complaint processing / Social	<ul style="list-style-type: none"> - Assessment of social risks and compliance with the E&S Policy - Assessment of social Impact studies - Evaluation of mitigation actions relevance - Update of mitigation actions planned 	The specialized committee /social	Within 15 working days
STEP 8: Registration and Decision Making		<ul style="list-style-type: none"> - Complaint Registration - Analysis of the reasoned opinion by the relevant committee - Arbitration on the reasoned opinion by the relevant committee - Decision making 	The upper arbitration committee chaired by the Executive Secretary/ with expert/Environmental impact assessment officer	Within 10 working days
STEP 9: Publication of the decision		<ul style="list-style-type: none"> - On OSS's website - On executing entities' website - Publication of the decision to the concerned public 	Secretariat	During 4 weeks

Treatment of complaint (STEP 6 to STEP 9) is available for complaint assessed by OSS and by executive entities.

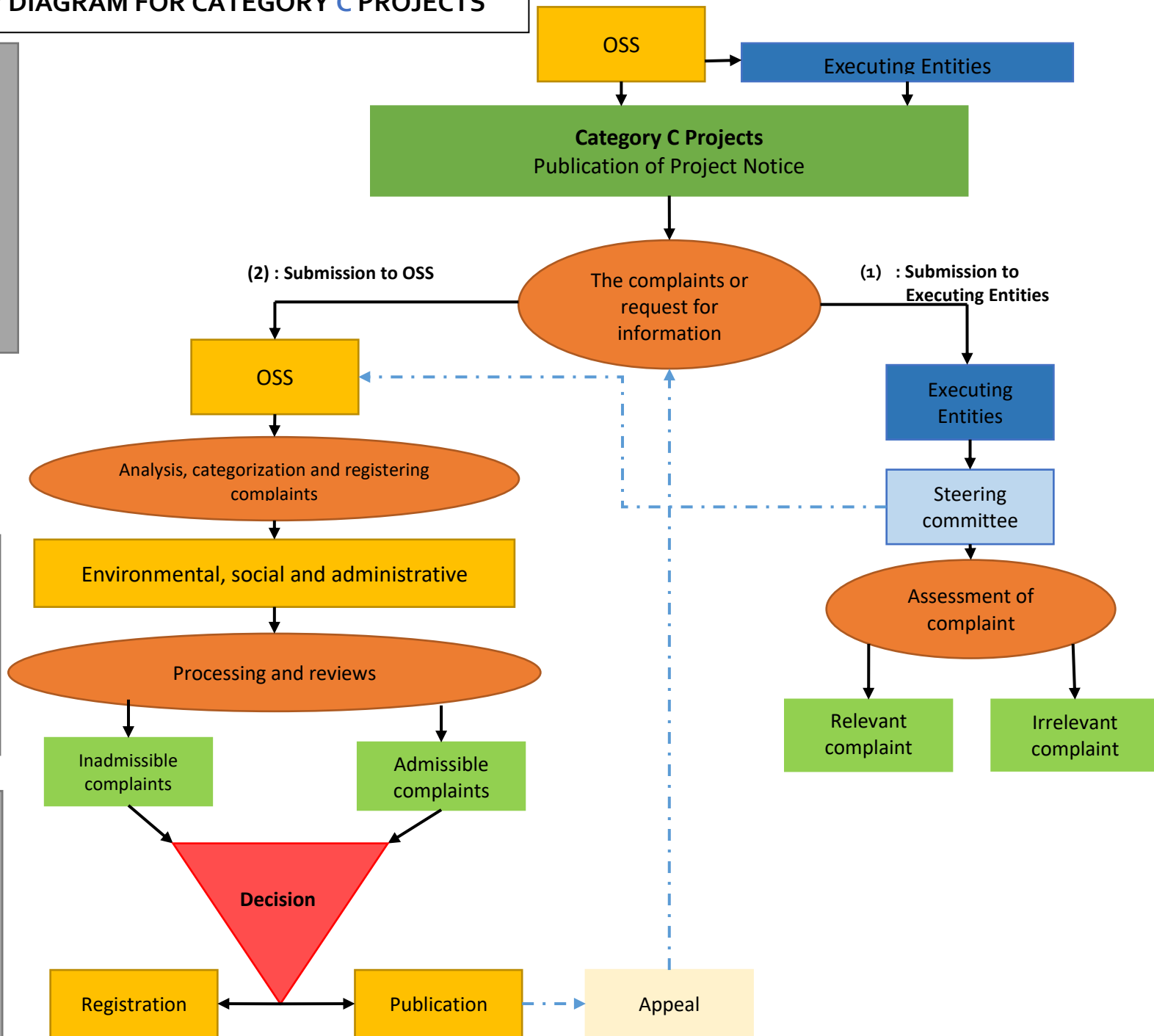
FLOW DIAGRAM FOR CATEGORY C PROJECTS

The
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Environmental and
Social Committee

The president of the
Environmental and
Social Committee

The upper arbitration
committee
Committees with
expert/Environmental
impact assessment
officer



Project
Information
disclosure

Complaint

Screening
and
assessing
issues
raised

Addressing
issues
raised



External communication steps for Category C projects

WHAT	HOW	WHO	WHEN
Project information complaint			
STEP 1 : Publication of project information notice	<ul style="list-style-type: none"> - OSS's website; - Executing entities' website; - Partner's website - Radio announcement 	<ul style="list-style-type: none"> - OSS - Executing entities 	
Complaint			
STEP 2: Complaint filing	<ul style="list-style-type: none"> - Fill out the complaint form 	<ul style="list-style-type: none"> - Project partners - Local population - CSO - Third parties 	30 days after the project information notice publication
Complaint submitted to Executing Entity			
STEP 3: Receipt of complaint	<ul style="list-style-type: none"> - Receiving an email - Postal service - Hand delivery 	<ul style="list-style-type: none"> - The representative of executing entities 	During the 30 days after the project information notice publication
STEP 4 : Assessment of complaints	<ul style="list-style-type: none"> - Complaint relevance assessment - Decision submission to OSS 	<ul style="list-style-type: none"> - The representative of executing entities 	Within 10 working days
Complaint submitted to OSS			
STEP 3': Receipt of complaint direct from public	<ul style="list-style-type: none"> - Receiving an email: doleances@oss.org.tn - Postal service - Hand delivery (Boulevard du Leader Yasser Arafat, PoB 31, Tunis 1080, Tunisia)	<ul style="list-style-type: none"> - The president of the Environmental and Social Committee - OSS Secretariat 	During the 30 days after the project information notice publication
STEP 4': Receipt of complaint from Executing entity after first assessment	<ul style="list-style-type: none"> - Receiving an email: doleances@oss.org.tn - Postal service - Hand delivery (Boulevard du Leader Yasser Arafat, PoB 31, Tunis 1080, Tunisia)	<ul style="list-style-type: none"> - The president of the Environmental and Social Committee - OSS Secretariat 	Within 10 working days after the 30 days following the project information notice publication
OSS Screening and Assessing issues raised			
STEP 5 : Analysis, categorization and registering complaints	<ul style="list-style-type: none"> - Registration - Documentations (Project location, nature of infringement, documents or other evidence, name and address of the complainant, reasoned opinion) - Risk screening - Evidence - Compliance with the reference documents 	The Environmental and Social Committee	Within 7 working days



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STEP 6: Complaint processing/Environment, administrative and social	<ul style="list-style-type: none">- Assessment of environmental or social risks and compliance with the E&S Policy- Assessment of Environmental or social Impact studies- Evaluation of mitigation actions relevance- Update of mitigation actions planned- Whistleblowing procedure	Environmental and Social Committee	Within 15 working days
STEP 7: Registration and Decision Making	<ul style="list-style-type: none">- Complaint Registration- Analysis of the reasoned opinion by the relevant committee- Arbitration on the reasoned opinion by the relevant committee- Decision making	The upper arbitration committee chaired by the Executive Secretary/ with expert/Environmental impact assessment officer	Within 5 working days
STEP 8: Publication of the decision	<ul style="list-style-type: none">- On OSS's website- On executing entities' website- Publication of the decision to the concerned public	Secretariat	Within 17 working days after receipt of the complaint

Treatment of complaint (STEP 5 to STEP 8) is available for complaint assessed by OSS and executive entities.



Annex: Complaint form

Complaint Form	
Complainant information	
Name	
On behalf of	
Phone	
E-mail address	
Do you request that identity be kept confidential? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Complaint	
Subject	<div>.....</div> <div>.....</div> <div>.....</div> <div>.....</div> <div>Project name</div> <div>.....</div> <div>.....</div> <div>Project location (Country, Village, etc.)</div> <div>.....</div> <div>.....</div>
Details of the complaint (include nature of the infringement)	
Supporting documents (if any)	
Which results you wish to be achieved (optional)	
Reserved for Social and Environmental Committee	
Registration number	
Received by	Date



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Nature of the complaint	
Conditions of admissibility	Admissible <input type="checkbox"/> Non admissible <input type="checkbox"/>
<i>Reserved for the specialized commission</i>	
Reasoned opinion	
NOTES	
<ol style="list-style-type: none">1. This form is to ensure that the complaint is received, key information is provided and action is initiated for investigation.2. The "Complainant" may not be a person, the request can be initiated by a letter sent to a newspaper, an article or the Internet.3. Complaints may be submitted by mail, fax, e-mail, or hand delivery to the OSS.4. The "Details" must include a brief description and may refer to a letter or any other detailing document. Complaint may include any other information that s/he consider relevant5. If the supporting documents are provided, it is important that they are registered to be examined during the investigation and to avoid any subsequent complaint alleging a concealment of pieces, even if it is not intentional6. Under the "expected result", the complainant must specify the expected outcome after filing complaints such as: disciplinary action, cancellation decision etc.7. It is accepted that the ON maintains a register of all complaints received indicating the results of the survey in the "registration number".8. The person receiving the complaint must sign and date the form.9. When an investigation request is made, the person's name assigned to the investigation and the date on which he/she receives the complaint are recorded	

Signature:

Date:



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