



**SAHARA
AND SAHEL
OBSERVATORY**

COMPREHENSIVE SOCIAL AND ENVIRONMENTAL GRIEVANCE AND PROTECTION MECHANISM PROCEDURE

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ACRONYMS

CSEGPMP	Comprehensive Social and Environmental Grievance and Protection Mechanism Procedure
ES	Executive Secretary
ESC	Environmental and Social Committee
GCGHU	Governance Compliance and Grievance Handling Unit
HRU	Human Resources Unit
IT	Investigative team
MRT	Monitoring and Reporting Team
OSS	Sahara and Sahel Observatory



DEFINITIONS

Board members: Board members of the OSS.

Comprehensive Social and Environmental Grievance and Protection Mechanism Procedure (CSEGPMP): A comprehensive framework to address and manage claims, grievances and safeguards related to social and environmental issues. It serves as a procedure outlining the steps and guidelines to be followed in accordance with relevant policies, including the Environmental and Social Policy, the Policy on Safeguarding from Sexual Exploitation, Abuse and Harassment and the Involuntary Displacement and Resettlement Policy.

Counterparty: Any individual, organization, institution or other entity involved in OSS activities.

Covered Individual: Any individual working at any level or grade within the OSS.

Environmental and Social Committee (ESC): Committee responsible for overseeing compliance with procedures related to programs and projects implemented or carried out by the Observatory, ensuring compliance with the Observatory's environmental, social and gender policies. This oversight is exercised through the evaluation of project proposals, the monitoring of their implementation, and the conduct of annual, mid-term and final evaluations. It also collaborates with the Investigative Team (IT) of the Governance Compliance and Grievance Handling Unit (GCGHU) in following up and handling complaints received under its jurisdiction.

Evidence: A physical object, record, document in any form, statement, or other information intended to prove the existence or nonexistence of a claim or fact.

False or Malicious Report: Any inaccurate or misleading report made intentionally or recklessly to gain an improper advantage and/or cause harm to any person or entity.

Governance Compliance and Grievance Handling Unit (GCGHU): Independent body within the OSS directly reporting to the Executive Secretary and responsible for ensuring adherence to governance principles and regulations. The GCGHU oversees the implementation of OSS policies and procedures, and addresses complaints or grievances raised by stakeholders, partners or any individual or entity working or involved in OSS activities. La GCGHU plays a critical role in promoting transparency, accountability and ethical conduct, while effectively managing and resolving any complaints or disputes that may arise within the Observatory.

Human Resources Unit (HRU): A body forming part of the OSS Administrative and Financial Department (AFD). Its duties mainly include recruitment, personnel and benefits management. It also deals with cases of misconduct and unethical behavior falling within its remit.

Investigative Team (IT): A subdivision of the Governance Compliance and Grievance Handling Unit (GCGHU) charged with conducting investigations in conjunction with the appropriate OSS body.



Monitoring and Reporting Team (MRT): A subdivision of the Governance Compliance and Grievance Handling Unit (GCGHU) responsible for monitoring and reporting any suspicious activity related to OSS activities.

1. INTRODUCTION AND OBJECTIVE

Since its creation, the Sahara and Sahel Observatory (hereafter referred to as OSS or Observatory) has strengthened its environmental, social and gender responsibility in order to guarantee positive results of its actions. As such, the OSS is committed to ensuring that its activities are implemented and executed in accordance with its environmental, social and gender commitments.

Despite all the measures taken by OSS to mitigate and minimize the environmental and social risks associated with its activities, there is still the potential for unintended harm to people and the environment. Recognizing the importance of being able to lodge a complaint against harm caused or unethical behavior, OSS has established this Comprehensive Social and Environmental Grievance and Protection Mechanism Procedure (hereinafter referred to as the Mechanism or CSEGMP) to mitigate these possible situations and to implement the principles to which it has committed itself in its Environmental and Social, Gender and Involuntary Displacement and Resettlement Policies (hereinafter referred to as the Relevant Policies).

This Mechanism is an independent redress process that makes OSS more accessible to communities that may be affected by its activities by providing a transparent, fair and effective system for responding to their concerns about environmental, social or gender impacts. It is intended to establish effective measures to comply with regulatory requirements and to enable the Observatory to achieve the objectives set out in its relevant policies, namely to:

- Ensure that OSS practices regarding environmental and social risks are in line with internationally recognized standards;
- Avoid and, where avoidance is not possible, to mitigate adverse impacts on people and the environment;
- Ensure fair access to development benefits by defining a common, comprehensive framework for integrating environmental and social standards into the planning, appraisal, implementation and monitoring of OSS activities;
- Give due consideration to persons in vulnerable positions and situations as well as marginalized populations, groups and individuals (women and girls, local communities, indigenous peoples, etc.) who are or may be affected by the Observatory's activities and who are particularly vulnerable to exploitation or other potentially harmful unintended project impacts;
- Require stakeholders and executing agencies of OSS-implemented projects to adhere to the principles of the Policy and to take appropriate account of environmental and social impacts;
- Ensure that stakeholders and OSS member countries understand the importance of these Relevant Policy Commitments;
- Mobilize partners and resources for effective Gender Policy implementation;
- Promote participatory and equitable development for women and men, and ensure equal and fair access to resources and opportunities for both sexes, with full respect

- for their fundamental rights, in accordance with the Gender Policy; and
- Avoid or reduce the adverse effects of involuntary physical or economic displacement of populations and to ensure that they are treated fairly and benefit from the project causing their resettlement, in accordance with the Involuntary Displacement and Resettlement Policy.

2. SCOPE

The Comprehensive Social and Environmental Grievance and Protection Mechanism Procedure applies to Covered Individuals and Counterparties and covers all OSS activities at the institutional and counterparty levels.

To ensure compliance with relevant OSS policies, the Governance Compliance and Grievance Handling Unit (GCGHU) is responsible for handling reports of alleged harm and will work with the appropriate body to conduct the investigation.

3. PROCEDURE STEPS

3.1. OVERVIEW

The GCGHU is the body within the CSEGPMP responsible for the independent review of environmental, social and gender complaints that arise at the project/program level.

In accordance with the relevant policies of the Observatory, any person or entity may report a complaint to the GCGHU, which, through its Investigative Team (IT), will work with the appropriate body (ESC, the Environmental and Social Committee, or HRU, the Human Resources Unit) to conduct the investigation.

Any individual or group of individuals can file a complaint if they are affected (or at risk of being affected) by an OSS-supported project/program or activity and if it relates to environmental, social or gender issues. To file a complaint, the complainant should complete the form (Appendix 1), which is available in the following languages Arabic, English, French, Portuguese and Spanish. The name of the complainant will be kept confidential if he/she explicitly requests it.

Relevant documents or other supporting materials should be attached to the form and submitted as soon as possible in person at OSS headquarters or through the following channels:

Email:	gcghu@oss.org.tn
Mailing Address:	Governance Compliance and Grievance Handling Unit Observatoire du Sahara et du Sahel BP 31, Boulevard du Leader Yasser Arafat. Tunis 1080 Republic of Tunisia
Hotline:	+216 71 206 633/634

The completed complaint must include the following information to facilitate the resolution process:

- Identify the author of the complaint unless the complaint is intended to be anonymous;
- Identify the representative, if any, and provide evidence that he or she is authorized to represent the complainant;
- Provide contact information for the complainant and the representative, if any (home and/or mailing address, telephone number and/or e-mail address);
- Describe the project associated with the complaint, if applicable;
- Describe how the act or omission of the OSS or its partner has caused or is likely to cause harm to the injured parties;
- Describe the actual and/or potential environmental and/or social impacts that led to the filing of the complaint;
- If possible, include items that may support the complaint (photos, videos, statements, testimonies, etc.).

Complainants who wish to resubmit a complaint regarding issues previously addressed by the OSS must provide new evidence or circumstances that warrant reconsideration of the case.

Any person or entity involved in a complaint must be notified within a reasonable time of the allegations made against them, provided that such notification does not interfere with the ongoing investigation of the harm caused.

In addition, as a matter of due process, no findings will be made with respect to a Covered Individual or entity unless the Covered Individual or entity has been given an opportunity to respond to the complaint report.

Full cooperation with GCGHU investigations is expected from all OSS employees, board members, and other individuals associated with OSS. No approval or authorization is required for them to provide such cooperation. Failure to comply with or obstruction of the investigation process may result in disciplinary action, depending on the severity of the case, including one or more of the following:

- Written warning or reprimand;
- Wage deduction;
- Temporary or permanent suspension;
- Legal action.

The GCGHU does not handle complaints about:

- Issues related to projects/programs or activities not executed or implemented by OSS;
- Applications for direct compensation;
- Cases brought before appellate courts or similar bodies;
- Frivolous and malicious claims.

Any person or entity submitting a false or malicious complaint report will not be protected by the relevant policies of the Observatory and will be subject to one or more of the following sanctions or disciplinary actions:

- Written warning or reprimand;

- Wage deduction;
- Temporary or permanent suspension;
- Suspension of contract;
- Legal action;
- Blacklisting or exclusion.

In accordance with the guidelines set forth in the relevant policies of the Observatory, the GCGHU shall establish and make publicly available a case registry of complaint reports. Disclosure of this registry shall be in accordance with OSS policies and standards for disclosure of information.

All those in contractual agreement or partnership with the OSS should be responsible for providing their representatives, employees, agents and/or officials with relevant information regarding this Mechanism. At the project level, the OSS requires the executing agency to inform the communities affected or likely to be affected by the Observatory's activities about this mechanism at the earliest opportunity in the stakeholder engagement process, in an understandable format and in all relevant languages.

3.2. STEPS

Any complaint received shall be addressed to the Monitoring and Reporting Team (MRT) of the GCGHU. MRT will acknowledge receipt of the complaint within three (3) working days. The MRT has five (5) working days after receiving sufficient evidence to assess the validity of the report before deciding whether to conduct an investigation in coordination with the appropriate body (the ESC if the complaint is at the project level or the HRU if the complaint is at the institutional level) or to close the case.

If the preliminary assessment reveals concrete and credible information in line with the acts targeted by the relevant policies, a proper investigation will be launched within two (2) working days by one of the bodies of the OSS (ESC or HRU), as appropriate, depending on the nature of the reported complaint, in collaboration with the IT of the GCGHU.

The person or entity named in the complaint report will be given 14 working days to prepare a defense and respond to the allegations of harm. They should submit their responses to the MRT of the GCGHU, which will then forward them to the IT and the investigating body.

Upon completion of the investigation, the investigating body and the IT shall draft recommendations and corrective and/or disciplinary action (if any) within ten (10) working days and submit them to the Executive Secretary (ES) and the Head of the GCGHU, who shall determine the final action to be taken, if any.

If the investigation does not substantiate the harm caused, the case will be closed.

The complainant will then be notified of the final results of the investigation.

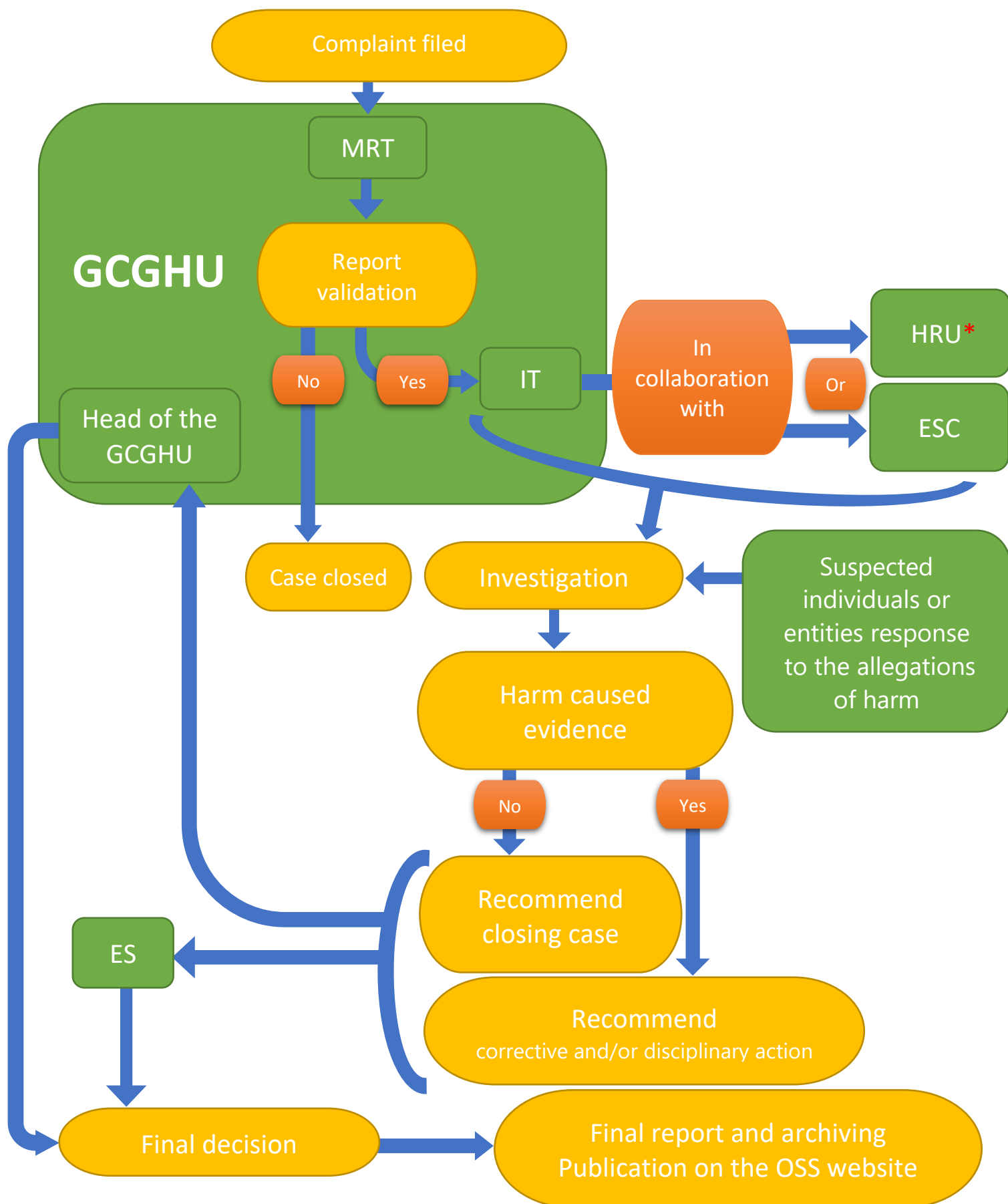
Upon completion of the case (whether or not it has been resolved), the entity involved in the conduct of the investigation, in conjunction with the IT, shall prepare a final report and record the case in the appropriate complaint registry within twenty-two (22) working days.

The final report shall be submitted to the ES as soon as it is completed.

The GCGHU shall include the final report in its annual report to the ES for information. The ES may forward the report to the OSS Board and Funds as appropriate.

All formal complaints and their follow-up will be published on the Observatory's website by the Communications Department.

4. FLOW CHART



5. COMPREHENSIVE SOCIAL AND ENVIRONMENTAL GRIEVANCE AND PROTECTION MECHANISM PROCEDURE

What?	How?	Who?
Step 1 – Complaint Receipt	Acknowledgement of receipt of each complaint within 3 working days of receipt	MRT
Step 2 – Complaint Reporting	Development of a complaint report by expanding the complainant's report	MRT
Step 3 – Complaint Report Validation	Evaluation of the report authenticity to determine the validity or invalidity of the complaint within 5 working days of receiving sufficient evidence	MRT
Step 4 – In case of complaint, validate and conduct investigations	Investigation (assessment of complaint resolution initiated within 2 working days of report validation)	IT along with the relevant body (ESC or HRU)
Step 5 – Defendant's Replies	Submit the defendant's replies to the MRT of the GCGHU which will forward them to the IT and the investigating body	Suspected persons/entities
Step 6 – Recommendations	<ul style="list-style-type: none"> If the alleged harm is not substantiated, the case will be closed In case of guilt, recommendations, corrective measures and potential disciplinary actions (if applicable) will be formulated 	IT along with the relevant body (ESC or HRU)
Step 7 – Final decisions	Make a final decision to close the case or implement recommendations, corrective actions, and possible disciplinary action	ES and the head of the GCGHU
Step 8 – Final report	Preparation of a comprehensive final	IT along with

	report detailing the entire case	the relevant body (ESC or HRU)
Step 9 – Archiving	Registration of the case in the Complaint Registry	IT
Step 10 – Publication	Publication of the report on the OSS website	Communication Department

6. EFFECTIVENESS AND REVIEW

The CSEGMP procedure will come into effect upon its adoption by the Executive Secretary of the OSS. It will apply to all ongoing projects and programs of the OSS to the extent possible, as well as those approved after the effective date.

This Procedure will remain in effect until amended or replaced. It will be reviewed and updated as necessary.

Appendix 1

Complaint Form

This Complaint Form may be completed by typing in the information requested. Once completed, you may print and sign, or upload a photo of your signature (instructions below) and email the completed form to gcghu@oss.org.tn.

Complainant Information	
Name	
On behalf of	
Phone number	
E-mail address	
Would you like your identity to remain confidential? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Complaint	
Subject	<p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>Project Title</p> <p>.....</p> <p>.....</p> <p>Project Location (Country, Village, etc.)</p> <p>.....</p> <p>.....</p>
Complaint details (including type of breach)	
Supporting documentation (if any)	

Expected Outcome? (optional)	
<i>Reserved for use by the Social and Environmental Committee</i>	
Registration Number	
Received from	Date
Type of Complaint	
Eligibility requirements	Eligible <input type="checkbox"/> Not eligible <input type="checkbox"/>
<i>Reserved for use by the Specialized Commission</i>	
Reasoned opinion	
REMARKS	
<ol style="list-style-type: none"> 1. This purpose of this Form is to ensure that the complaint is received, important information is provided, and action is initiated for investigation. 2. The "Complainant" cannot be a person; the request can be initiated by a letter sent to a newspaper, an article or published on the Internet. 3. Complaints may be submitted to OSS by mail, fax, e-mail, or hand delivery. 4. The "Details" must include a brief description and may refer to a letter or any other detailing document. The Complainant may include any other information that she/he deems relevant 5. If supporting documents are provided, it is important that they are registered so that they can be examined during the investigation and to avoid any subsequent complaint alleging concealment of parts, even if not intentional 6. Under "Expected Outcome", the Complainant must specify the expected outcome after filing the complaint such as: disciplinary action, dismissal, decision etc. 7. It is accepted that the ON will maintain a registry 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 is requested, the name of the person assigned to the investigation and the date the complaint was received will be recorded. 	

Signature:

Date:



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