

Papariko Project Violations Reporting and Grievance Mechanism

Guidelines

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Document Version History

V-Nr	Author/Contributor	Content added/changed	Date
1.0	Irina Fedorenko-Aula	First Draft - as approved	18.03.2023
2.0	Lena Mechenkova	Communication Channels added	15.09.2023
3.0	Lena Mechenkova	Roles and Responsibilities section added	04.08.2025

1. Introduction

The Papariko Project is committed to fostering a harmonious relationship with the communities it serves in Kenya. Central to this commitment is the establishment of a Violations Reporting and Grievance Mechanism, ensuring that community members have a voice in the project's activities and that their concerns are addressed in a timely and effective manner.

This document outlines the mechanism for reporting violations, concerns, and grievances, including the roles and responsibilities of Vlinder, the Papariko Project team, partners, and other relevant parties. It also provides guidance for project staff on how grievances should be received, documented, investigated, escalated, resolved, and communicated back to the complainant or affected community.

2. Objectives of the Mechanism

- Provide accessible, safe, and culturally appropriate channels for raising grievances and concerns.
- Ensure that grievances are recorded, reviewed, and addressed in a transparent and timely manner.
- Clarify the responsibilities of project stakeholders involved in receiving, recording, investigating, and resolving grievances.
- Ensure that grievances are addressed without retaliation, intimidation, discrimination, or conflict of interest.
- Support continuous improvement of project implementation, community engagement, environmental management, labour practices, and social safeguards.

3. Who May Raise Grievances

- Any community member involved in or affected by the project.
- Any project staff member, worker, contractor, or person otherwise employed or engaged by the project.
- Any participating Community Forest Association, community group, women's group, youth group, or other local organisation.

- Any project partner, implementing partner, service provider, consultant, subcontractor, or other organisation formally or informally involved in project implementation.
- Any other project stakeholder who considers themselves affected by the project in any way.

Grievances may be submitted individually or collectively. Anonymous grievances shall be accepted, recorded, reviewed, and addressed to the extent possible based on the information provided.

4. Types of Grievances

Grievances may relate to, but are not limited to, the following topics:

- Community engagement, consultation, participation, and information sharing.
- Benefit sharing, employment opportunities, payments, community development activities, or use of project-related funds.
- Environmental concerns, biodiversity impacts, restoration practices, or land-use issues.
- Health and safety, labour conditions, ethical labour, and treatment of workers.
- Diversity, inclusion, discrimination, harassment, safeguarding, and support for women, youth, and marginalised groups.
- Alleged misconduct, corruption, intimidation, conflict of interest, abuse of authority, or violation of project procedures.
- Any other concerns related to the Papariko Project or its implementation.

5. Communication Channels

To enable safe and accessible reporting, Vlinder has established and maintains the following communication channels:

- Dedicated suggestion boxes located outside the project office in Bodo and at participating villages.
- Regular office hours for face-to-face discussions at the project office in Bodo.
- Regular scheduled community meetings.
- Dedicated individuals available for private discussions: the Papariko Project Leader for all project-related issues; the Community Mobilizer for community and women-related issues; the Youth Mobilizer for youth-related issues; and

the Planting and Operations Manager for operational and planting-related issues.

- Direct communication with the Vlinder Project Manager, particularly for serious, sensitive, unresolved, or partner-related grievances.
- The Vlinder [whistleblowing hotline](#), accessible via the online form.

Project stakeholders shall be informed that they may use whichever channel they consider safest and most appropriate. Grievances submitted through any channel shall be treated as valid and shall be entered into the Violations and Grievances Registry.

6. Roles and Responsibilities

6.1 Vlinder Austria GmbH

Vlinder, as Project Proponent, has overall responsibility for ensuring that the Violations Reporting and Grievance Mechanism is accessible, transparent, properly documented, and effectively implemented. Vlinder's role includes oversight of grievance registration, review of the Violations and Grievances Registry, supervision of timely responses, tracking of corrective actions, and escalation of serious or unresolved grievances.

The Vlinder Project Manager shall review the grievance registry on a regular basis and ensure that grievances are addressed without retaliation, discrimination, or conflict of interest. Where grievances relate to project partners, local implementing entities, government representatives, community leadership, benefit-sharing, labour conditions, safeguarding, or allegations of misconduct, Vlinder shall ensure that the matter is reviewed independently and that appropriate corrective actions are taken.

6.2 Papariko Project Leader

- Acts as the primary local grievance focal point.
- Ensures that grievances received through any channel are entered into the Violations and Grievances Registry.
- Acknowledges grievances where contact information is available.
- Coordinates preliminary screening, investigation, response, and closure of grievances.
- Reports grievances and their status to the Vlinder Project Manager.
- Escalates serious, sensitive, unresolved, or conflict-of-interest cases to the Vlinder Project Manager.

6.3 Community Mobilizer, Youth Mobilizer, and Planting and Operations Manager

- Receive grievances or concerns raised during their regular interactions with community members, workers, youth, women's groups, or operational teams.
- Record accurate information when grievances are raised and promptly report them to the Papariko Project Leader.
- Support communication with complainants and affected groups, where appropriate.
- Do not investigate or decide on grievances where they may have a conflict of interest.

6.4 KFS

KFS representatives support the physical opening and checking of suggestion boxes in the presence of the Papariko Project Team representative. KFS are not the final custodian of grievance records and shall not independently close grievances received through the project mechanism.

- Any grievance, concern, or suggestion collected must be transferred to the Papariko Project Leader and Vlinder Project Manager for registration and follow-up.
- KFS may provide information or support during grievance review where relevant and where no conflict of interest exists.
- Where a grievance concerns KFS or their representatives, the concerned person or institution shall not participate in investigating, deciding on, or closing that grievance.
- Such grievances shall be escalated to the Vlinder Project Manager and, where appropriate, reviewed by an independent committee or mediator.

6.5 Independent Committee or Mediator

An independent committee or mediator may be appointed where neutrality is required, where the grievance is serious or sensitive, where the grievance concerns a project partner or person involved in grievance handling, or where the parties cannot reach agreement on the resolution. The mediator or committee should be acceptable to the affected parties where feasible.

7. Management of Suggestion Boxes

Suggestion boxes may be physically opened and checked by designated representatives of KFS together with a designated Papariko Project representative. All grievances, suggestions, or concerns collected through the suggestion boxes must be transferred to the Papariko Project Leader and Vlinder Project Manager for registration, review, and follow-up.

The Papariko Project Leader is responsible for ensuring that each grievance received through the suggestion boxes is recorded in the Violations and Grievances Registry. The Vlinder Project Manager is responsible for oversight of the registry and for ensuring that grievances are addressed in accordance with this mechanism.

Where a grievance concerns Vlinder or partner staff, community representatives, or any person involved in opening or checking the suggestion boxes, that person or organisation shall not participate in the investigation or resolution of the grievance. In such cases, the grievance shall be escalated to the Vlinder Project Manager and, where appropriate, to an independent committee or mediator acceptable to the affected parties.

8. Grievance Recording and Registry

All grievances, regardless of the communication channel used, shall be recorded in the Violations and Grievances Registry. The registry shall be maintained by the Papariko Project Leader and reviewed by the Vlinder Project Manager.

The registry should include, at minimum:

- Date the grievance was received.
- Name and contact details of the complainant, where provided; anonymous grievances shall also be recorded.
- Description and category of the grievance.
- Person or entity responsible for follow-up.
- Investigation steps taken.
- Proposed corrective action or resolution.
- Corrective action completed and evidence, where applicable.
- Date of response to the complainant or affected group.
- Whether the complainant was satisfied with the response, where known and possible.

9. Grievance Review and Resolution Process

The following process shall be followed for grievances received through any channel:

1. Receipt: The grievance is received through a suggestion box, meeting, office hours, hotline, private discussion, staff member, or direct communication with Vlinder.
2. Registration: The grievance is entered into the Violations and Grievances Registry by the Papariko Project Leader or another designated person under their supervision.
3. Acknowledgement: Where contact details are available, the complainant is informed that the grievance has been received.
4. Screening: The grievance is screened for urgency, sensitivity, seriousness, and possible conflict of interest.
5. Investigation: The Papariko Project Leader and/or Vlinder Project Manager investigate the grievance. If necessary, an independent committee or mediator is appointed.
6. Resolution: Corrective action or another appropriate response is proposed and implemented.
7. Feedback: The complainant or affected group is informed of the outcome, subject to confidentiality and privacy requirements.
8. Closure: The grievance is closed in the registry once the response and corrective action have been completed and documented.
9. Escalation: If the grievance remains unresolved or the parties cannot agree on the resolution, the matter shall be referred to an independent mediator acceptable to the parties, where feasible.

10. Timelines

A timeline will be established for responding to grievances, ranging from one day to one month, depending on the urgency and complexity of the issue. Urgent grievances involving safety, safeguarding, intimidation, retaliation, serious misconduct, or significant environmental or social harm shall be prioritised and escalated immediately to the Vlinder Project Manager.

Where a grievance cannot be resolved within the expected timeframe, the complainant or affected group should be informed of the reason for the delay and

the expected next steps, where contact details are available and where doing so does not compromise confidentiality or safety.

11. Feedback Mechanism

- When the investigation is completed, the Pappariko Project Leader, with oversight from the Vlinder Project Manager where appropriate, will provide a response to the respective community member, staff member, worker, or stakeholder.
- Community members may receive feedback on the outcomes of collective grievances during community meetings, provided confidentiality and privacy are respected.
- Dedicated female team members will be available to address women's concerns in a safe and supportive environment.
- Based on the results of the investigation, appropriate corrective actions will be taken and documented in the registry.
- Where the complainant is dissatisfied with the proposed resolution, the grievance may be escalated to the Vlinder Project Manager and, where appropriate, to an independent mediator.

12. Confidentiality, Non-Retaliation, and Conflict of Interest

12.1 Confidentiality and Privacy

Project staff and partners shall respect the confidentiality and privacy of individuals when receiving, investigating, and responding to grievances. Sensitive information shared during grievance resolution processes shall be safeguarded and shared only with persons who need the information to address the grievance appropriately.

12.2 Non-Retaliation

No community member, staff member, worker, contractor, or stakeholder shall face retaliation, intimidation, exclusion, loss of project benefits, discrimination, or any other negative consequence for raising a grievance in good faith. Allegations of retaliation shall themselves be treated as serious grievances and escalated to the Vlinder Project Manager.

12.3 Conflict of Interest

Any person or institution that is the subject of a grievance or may have a conflict of interest shall not be responsible for investigating, deciding on, or closing that grievance. This applies to Vlinder staff, Papariko Project staff, project partners staff, community representatives, and any other project stakeholder involved in grievance handling.

13. Publicizing the Grievance Mechanism

- Inform community members, project staff, workers, contractors, and other project stakeholders about the grievance mechanism during community and staff meetings.
- Explain the available reporting channels, including suggestion boxes, office hours, private discussions, the hotline, and direct escalation to Vlinder.
- Inform stakeholders that grievances may be submitted anonymously and without fear of retaliation.
- Ensure that women, youth, and marginalised groups are aware of safe and accessible ways to raise concerns.
- Repeat communication on the grievance mechanism periodically and whenever new community members, workers, or staff join the project.

14. Training

- Organise knowledge sharing and training on the Violations Reporting and Grievance Mechanism for project staff and community members joining the project.
- Train relevant staff and partners on how to receive grievances respectfully, document them accurately, maintain confidentiality, avoid retaliation, and identify conflicts of interest.
- Request additional training on the Violations Reporting and Grievance Mechanism for yourself or members of your team when needed.
- Ensure that staff involved in opening suggestion boxes or interacting directly with complainants understand their responsibility to transfer grievances to the Papariko Project Leader and Vlinder Project Manager.

15. Communication Guidelines

Vlinder abides by the following values and communication principles and expects project stakeholders to do the same.

15.1 Respectful Communication

- Engage with community members and fellow project staff in a respectful and courteous manner.
- Listen attentively to others' perspectives and concerns.

15.2 Transparency and Honesty

- Record accurate information when grievances are raised.
- Demonstrate transparency and honesty in all interactions with project representatives and affected stakeholders.

15.3 Cooperation and Collaboration

- Collaborate with community members, project staff, and other project stakeholders to address grievances and find mutually beneficial solutions.
- Work together to support the success and sustainability of the Pappariko Project.

15.4 Empowerment and Participation

- Take an active role in community meetings and discussions, sharing and listening to insights, concerns, and suggestions.
- Empower women, youth, and marginalised groups to voice their grievances and contribute to decision-making processes.

15.5 Confidentiality and Privacy

- Respect the confidentiality and privacy of individuals when addressing grievances or providing feedback.
- Safeguard sensitive information shared during grievance resolution processes.