



Protocol 7

Complaint Response Mechanism (CRM)

Composed by Form Ghana
Last revised on March 2022
Responsible: HR manager

Managing Director Form Ghana

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Willem Fourie

1 Protocol purpose

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

1.1. Definition

- a. What is compliant - Form Ghana describes complaint as a formal verbal or written expression of dissatisfaction or misconduct about someone or something. for example, concern about staff behaviour, quality of Form Ghana project delivery, Abuse of power, Corruption and harassment.

What is not a complaint are:

- A general inquiry about Form Ghana
 - Clarification of information's such as notices, memorandum
 - A request for information
- b. Complaint Response Mechanism proposes a solution to complainant to report a case through a formal and safe Channel for the company to deal with complaints in a formal and fair manner

1.2 Who can raise or file a complaint

- Individual or Group of employees (Short term and Permanent)
- Form Ghana working communities
- Other Form Ghana stakeholders (individual or group)

1.3 Complaints Channels – Complaints can be raised through:

- In person
- Meetings or Forums
- A Suggestion box
- Email message to an assigned confidential email (relations@formghana.org)
- Compliant Hotline (For employee and stakeholders)

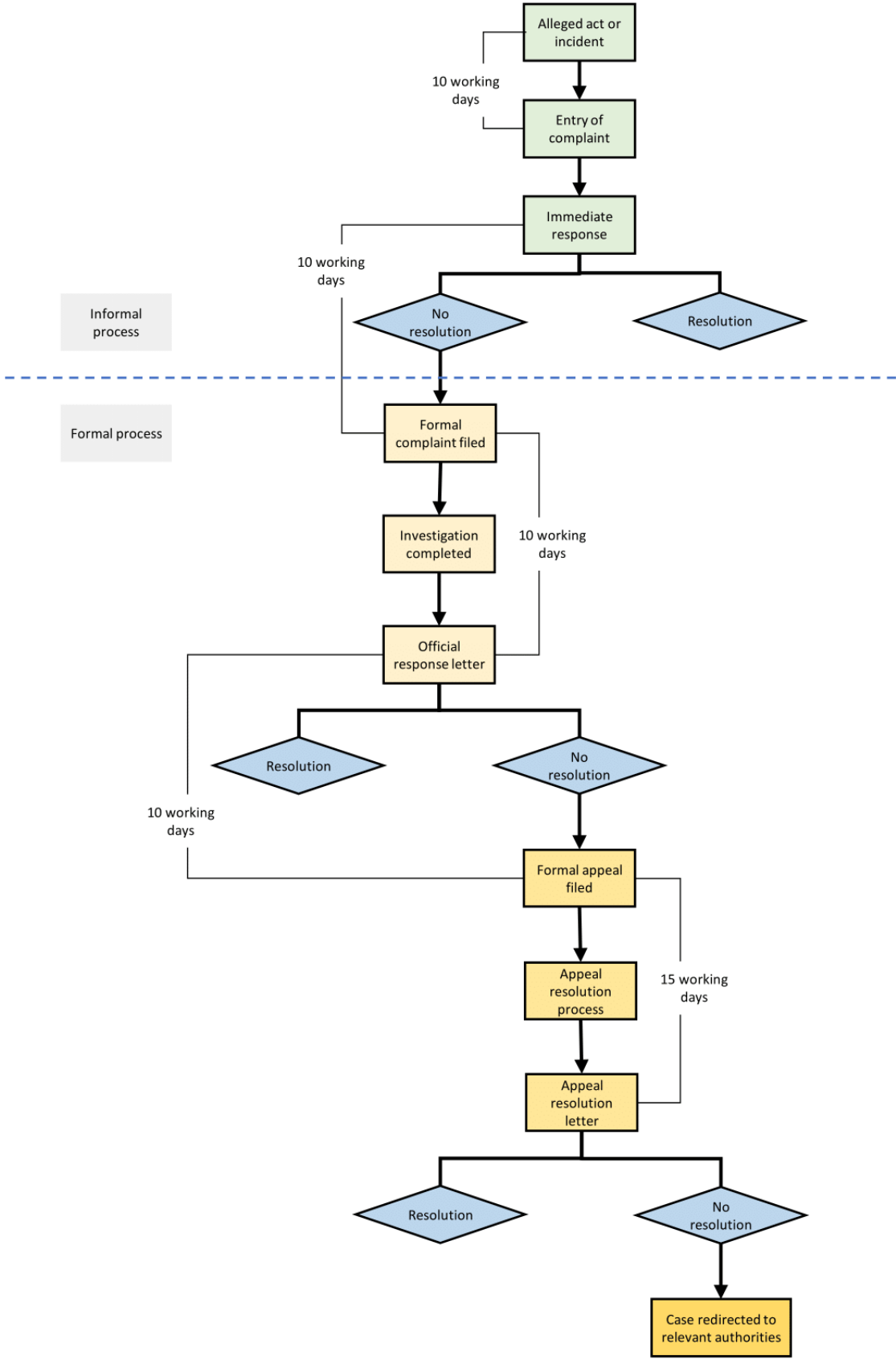
Order of the CRM -Two-way communication

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 CRM 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; 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 complaint’s file/form. 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/are read to and reached agreement.

On each site, a Complaints Resolution Staff (CRS) has been trained in handling, registration of grievances or complaints, and follow-up including the respect of timelines. Specifically, responsible is the Plantation Manager who liaises with the HR Personnel. Besides the CRS, management have been trained in handling complaints.

Overview of cases

The company has a transparent **complaint registration system** in place that ensures equal handling of each complaint and enables the company to analyse 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 complaints or concerns through any of the complaint channels either in person or anonymously. Employees can report complaints to their direct next level of supervision and escalates through the levels of management as the first point of entry in the complaints handling mechanism (table 1).

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

Company	Function	Entry point
Employees	Contractors	Team leaders Foremen Supervisors
	Management trainees	Supervisor Foresters/Officers

	Permanent staff (A-B1)	Team Leader Foremen Supervisors
	Permanent staff (B2-C4)	Supervisors Foresters/Officers Plantation Manager
	Senior Management (C5-D)	Fin & Administrative Manager Forest Manager Managing Director

Or

Through complaint email or Hotline below;

Complaint Email contact	relations@formghana.org
Complaint Phone line	+233 (0) 551552227

*The Hotline is managed by a trained and qualified independent body outside the company

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 Environment and Social Officers (E&S Officers) and (E&S Manager). The contact persons are referred to as Complaints Resolution Staff (CRS), trained specifically in the handling of complaints or grievances.

Government bodies, service providers, and NGOs can file a complaint with the E&S Manager. All other complaints will be handled by the E&S Manager and Forest Manager 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	E&S Officers E&S Manager
Pastoralists	E&S Officers E&S Manager
Government	E&S Manager
Service providers	E&S Manager
NGOs	E&S Manager

Or

Through complaint email or hotline below;

Complaint Email contact	relations@formghana.org
Complaint Phone line	+233 (0) 551552227

Various ways to lodge a complaint

Internal Complaints

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. Management members and CRS attends these meetings. If the complaint is not solved in the Workers' Union meeting, the complaint can be taken to the Plantation Manager, and follow by the official CRM procedure.

Complainants with access to internet can choose for electronic submission of their grievance or complaint through the company's complaint email address. Also, complaints can be lodged through telephone hotlines. Email address and phone number (s) are announced to employees and copies placed on various vantage places. Complaints received via email or telephone hotlines are sent to the CRS or senior management depending on the complainant.

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

External Complaints

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.

Stakeholders can also choose to express their complaints at Stakeholders meetings, community meetings and intercropper/outgrower meetings, focus group discussions and one-on-one meetings. A member of the CRS attends these meetings. If the complaint is not solved in the meeting, the complaint can be taken to the E&S Manager, 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's complaint email address. Also, complaints can be lodged through telephone hotlines. Email address and phone number (s) are announced to stakeholders and copies placed on community notice boards. Complaints received via email or telephone hotlines are sent to the E&S Manager.

Anonymous complaints

Anonymous complaint refers to complaints that is raised without revealing the identity of the complainant. This seems to be difficult to deal with because investigation of anonymous complaint is always dependent upon limited and questionable information.

A suggestion box has been installed at the company office blocks and email/complaint phone line is given out 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 complaint box is emptied weekly by the designated Plantation Manager on site and E&S Manager. Anonymous complaints that have been filed through the suggestion box/email/phone line will be registered on a Complaint Registration Form, but are left without a signature.

Malicious complaints

Malicious complaints are complaints raised/filed with the intention to cause damage or harm, for example deliberately defaming a subordinate, colleague and superior, lies, complaint based on rumors and gossip.

Form Ghana Limited considers that, all complaints are made in good faith and are not driven by the intent for personal gain or interest or grudge. If malicious complaint is received with clear evidence, investigation will not be conducted and disciplinary action will be applied according to Form Ghana's disciplinary procedure.

Ensuring Confidentiality and creating Trust

Privacy and safety of complainants and witnesses will be protected. Investigation reports of complains should be restricted and accessed only by authorized employees for finalizing investigations.

An enabling environment will be created to enable persons to have easy access to the CRM especially the disadvantage group such as women and illiterates. Management are responsible to create trust and encourage workers to support the CRM. Constant training will be done for all staff annually on CRM to enable staff understand the CRM.

Persons handling complaints should have the right qualities to handle complaints such as been trustworthy, neutral, knowledgeable in handling complains, motivated, consistency in handling complains, interpersonal skills and courageous.

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 complaint Registration Form 1&2 (Annex 1&2). Compliant received from individual/Group is first registered in (Compliant registration Form 1), the case gets a case number: location-number-Year. 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.

A copy of the CRM 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 Complaint Registration Form. The case is always OPEN at this point.

Complaints received via mail, email and phone call will also be recorded on the compliant registration form (1 or 2). Again, complaint received from individuals in meetings/forums will be recorded in the complaint registration form 2. Complaint filed should be read to members in the meeting as a confirmation of receipt and for agreement signed off by a union executive. After resolution of complaints filed through meetings/forums, it should be read out to

complainants in a meeting for agreement and conclusion which will be signed off by a union executive representative.

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 through letter within 10 working days after registration of the complaint, 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

1. 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.
2. 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 CRM-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 CRM-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 Forest Manager and/or Managing Director.

The Forest 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 Forest 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 Forest 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 Forest 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.

B. 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 CRM 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 CRM form. (opponents might not be willing to sign). The case is digitized in the CRM 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 is 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 CRM 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.

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: / /



Annex 1

Complaint 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*

..... SYI.....

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, hotline, other)	
Name of the person the complaint was first reported to	
Date complaint first reported	

REGISTRATION of the complaint:

Describe in detail and accurately the nature of the complaint

Strikeout what does not apply (depending on the type of case):

- A. The complainant declares the above complaint is correctly put into words. The procedure of follow-up is explained and understood by the complainant.
- B. Form Ghana has communicated the complaint or potential conflict situation to the opponent stakeholder (group). By signing, the opponent stakeholder declares they understand the nature of the complaint. The follow-up procedure is explained and understood by the opponent.

Signature Complainant / Opponent:	Signature on behalf of Form Ghana:	Where applicable, the signature of 3 rd party involved
Name of Complainant/Opponent:	Name Form representative:	Name 3 rd party:
Date:	Date:	Date:

Immediate Response

Describe the immediate response given by FG

Form Ghana and the complainant / opponent agree on the solution described above.
After signature the case will be closed. If no agreement is reached at this point, do not sign!

Signature Complainant / Opponent:	Signature on behalf of Form Ghana	Where applicable, the signature of 3 rd party involved
Name of Complainant/ Opponent:	Name Form representative:	Name 3 rd party:
Date:	Date:	Date:

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 of Complainant / Opponent for acceptance on the proposed solution:	Signature on behalf of Form Ghana	Where applicable, signature of 3 rd party involved
Name of Complainant/Opponent:	Name of Form representative:	Name of 3 rd party:
Date:	Date:	Date:
<p>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.</p>		
<p><i>If no appeal form is received within 10 working days (after the date of the Official Response Letter), the case will be closed.</i></p>		

