



SOCIALCARBON®

# Grievance Approval Procedure

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## About

Developed in 2005 in Tocantins, Brazil the SOCIALCARBON Standard was created by Ecologica Institute, a Civil Society Organisation of Public Interest (OSCIP). The SOCIALCARBON Standard was designed during the implementation of Brazil's first carbon sequestration project in the Bananal Island, with the differential of ensuring community involvement in the initiative. Since 2022, SOCIALCARBON has been managed by the Social Carbon Foundation, a UK Charitable Organisation with the mission to act in mitigating the effects of climate change through scientific research, environmental conservation, and community-based sustainability activities.

Since 2022, the SOCIALCARBON Standard has transitioned from a co-benefits standard to a full standard for nature-based solutions. We believe that climate action and nature-based solutions must include the participation of the local people or they will not be sustainable in the long-term. The transition of the SOCIALCARBON Standard into a full standard for nature-based solutions further supports our mission of scaling local action against biodiversity loss and climate change, but on a global scale. To enable this vision to become a reality, the Social Carbon Foundation develops high quality standards to facilitate market-driven mechanisms that accelerate the development of projects which deliver real results for our communities and the planet.

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# 1 Purpose and Scope

- 1.1.1 This document sets out the procedure to be followed for effective and timely resolutions to grievances relating to standard setting activities, procedures and Social Carbon Foundation itself, as well as, SOCIALCARBON Approved Validation & Verification Bodies (VVBs) or the Oversight Body<sup>1</sup> (if any).
- 1.1.2 The term “grievance” hereby refers to a “complaint,” “dispute,” “challenge,” “conflict,” and any similar term that expresses dissatisfaction with the SOCIALCARBON procedure and functioning, including entities mentioned in 1.1.1 above.
- 1.1.3 The scope of the SOCIALCARBON Grievance procedure is to provide a formal process for addressing grievances related to:
- SOCIALCARBON policies, procedures (including Standard Setting) or personnel
  - Substantive complaints regarding the rules, requirements, content of the standard documents
  - SOCIALCARBON VVBs or the Oversight Body (if any)
  - Non-compliance of standard requirements as applicable to a project, including but not limited to, stakeholder consultations and grievance mechanism, sustainable development impact, and safeguards assessment including monitoring activities
  - Certification decisions, including but not limited to, design certification, performance review, GHGs emission reductions monitoring, calculation approaches and any other certification related decisions
  - VVB audits
- 1.1.4 Social Carbon Foundation as a stakeholder or on behalf of the stakeholder community, reserves the right to file a grievance against VVBs or the Oversight Body and may open an investigation, as required.
- 1.1.5 Social Carbon Foundation invites and welcomes comments or suggestions on any SOCIALCARBON Requirements being developed and any update to its VVB Requirements from any individual or organisation following the procedure outlined in the Standard Setting Procedures. Social Carbon Foundation reserves the right to

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<sup>1</sup> Body that keeps an oversight on the performance of VVBs.

determine how comments should be responded to and, if necessary, may suggest following the grievance procedure for further handling of comments or suggestion.

## 2 Principles

- 2.1.1 The Social Carbon Foundation is committed to open, transparent and fair resolution of all allegations and complaints received against its procedures, functioning and organisation. The following are the guiding criteria<sup>2</sup> for dealing with grievances:
- a. Legitimate: Enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes
  - b. Accessible: Fully accessible to all stakeholders and providing adequate assistance for those who may face particular barriers to access
  - c. Predictable: Providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation
  - d. Equitable: Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
  - e. Transparent: Keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake
  - f. Rights-compatible: Ensuring that outcomes and remedies accord with internationally recognised human rights
  - g. Continuous learning: Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms

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<sup>2</sup> Adapted from UN Guiding Principles on Business and Human Rights (III. B. 31 – Effectiveness criteria for non-judicial grievance mechanisms) [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

- h. Engagement and dialogue: Consulting relevant stakeholder groups on their design and performance and focusing on dialogue as the means to address and resolve grievances

2.1.2 In addition to the above criteria:

- a. Any individuals involved in the investigation and/or decision-making process surrounding a grievance declares any conflict of interest they may have in the proceedings and disqualify themselves accordingly.
- b. Decisions must take into account relevant considerations and mitigating circumstances and ignore irrelevant considerations.
- c. Any retributions or reprisals against complainants or appellants are prohibited and will not be tolerated.

## 3 Eligibility

- 3.1.1 Any stakeholder may submit a grievance to Social Carbon Foundation following the procedure outlined in this document. By submitting a grievance, the complainant agrees to the provisions of this grievance procedure.
- 3.1.2 Anonymous complaints can hamper Social Carbon Foundation’s ability to arrive at a full understanding and resolution of the grievance. Social Carbon Foundation reserves the right to reject anonymous submissions if they do not include justification for anonymity and substantive evidence to support the allegations. Stakeholders are encouraged to identify themselves. However, complainant’s identity can be kept confidential upon their written request.
- 3.1.3 The following requests will not be considered via SOCIALCARBON Grievance procedure;



- a. A grievance that relates to the laws, policies, and regulations of the host country, unless this directly relates to the entity's obligation to comply with SOCIALCARBON principles, standards and procedures
- b. A grievance that relates to Social Carbon Foundation's housekeeping matters, such as finance, human resources and administration
- c. A grievance submitted by the same complainants on matters they submitted to the grievance mechanism earlier unless new evidence is provided; or
- d. A grievance related to a matter or allegations that has been investigated and resolved within the last two years, even if it has been submitted by a different complainant, unless new evidence is provided, or new allegations have been made

## 4 Grievance Procedure

4.1.1 Any stakeholder may submit a grievance through the SOCIALCARBON website's dedicated page for Grievances. Submissions must include the following information:

- Name, organisation and contact details (email and telephone/skype) of the stakeholder;
- Any request for confidentiality/anonymity of complainant with reasons.
- Description of the grievance including:
  - Timing of grievance/complaint
  - The principle, requirement, or procedure (if known) allegedly breached – Nature of grievance and perceived impact
  - Supporting evidence and documentation. Examples of supporting evidence may include correspondence, such as emails or letters, research studies, or letters of support from other stakeholders
- Declaration of any potential or perceived conflict of interest





- Declaration that information being provided is true, accurate and made in good faith
- 4.1.2 Grievance submissions must be accompanied with a document with evidence and additional comments about the grievance (i.e. if the complainant would like to be anonymity). Grievances related to specific projects shall be submitted through the dedicated “Project” webpage (<https://www.socialcarbon.org/feedback-project>). All other grievances should be submitted through the dedicated “Standard” webpage (<https://www.socialcarbon.org/feedback-standard>). Following the receipt of a valid grievance, the Social Carbon Foundation will conduct a desk review to determine the extent of the alleged breach of the SOCIALCARBON Requirements. Social Carbon Foundation will respond in writing within thirty (30) days of submission of grievance. If the grievance is found ineligible, SOCIALCARBON will provide an explanation and a recommendation on how to address the grievance correctly, if possible.
- 4.1.3 Within 20 days of completion of initial review the Social Carbon Foundation shall conduct an assessment to decide if an investigation is required, then the SOCIALCARBON will produce a written investigation plan. The investigation plan will include, but not be limited to, the scope of the investigation, a list of potential other stakeholders to be queried, and the timeline for resolution. If the complexity of the grievance requires it, the Social Carbon Foundation, at its discretion may appoint an external agency to conduct the investigation and manage the grievance.
- 4.1.4 Social Carbon Foundation shall send a non-disclosure agreement (NDA) to complainant. If any complainant party chooses not to sign the NDA, they shall not have access to the draft and final investigation reports, if Social Carbon Foundation decides not to make the investigation report public.
- 4.1.5 Following initial review, the Social Carbon Foundation may reach out to the complainant and/or parties involved to attempt to resolve the issue in an informal manner, unless such an attempt is reasonably considered an unnecessary exercise.
- 4.1.6 If the grievance cannot be resolved through informal discussion or mediation, Social Carbon Foundation will follow the process summarised in the figure below to resolve the grievance, within the indicative timelines.

- 4.1.7 Social Carbon Foundation shall conduct the investigation within 90 days after the initial review. Social Carbon Foundation reserves the right to extend the investigation deadlines, as required. The complainant will be informed about the revised timeline and expected dates.
- 4.1.8 During the initial review, investigation of grievance, Social Carbon Foundation may request additional information from complainant. If complainant is nonresponsive for more than 30 days during initial review or investigation, Social Carbon Foundation reserves the right to close the grievance. Extended periods of slow or non-responsiveness will affect the overall timelines for the investigation.
- 4.1.9 Social Carbon Foundation shall communicate the decision regarding the resolution, including the reasons for the decisions, if applicable, any follow up actions and/or corrective measures to complainant and parties involved in the grievance.
- 4.1.10 If the complainant is not satisfied with the resolution, the complainant has the right to appeal the outcome of an investigation by notifying the Social Carbon Foundation that it would like to do so within 30 days of receiving the investigation findings. Their request will only be considered if they can present evidence of material information that has not been accounted for in Social Carbon Foundation’s investigation.

## 5 Maintaining Records and Monitoring Actions

- 5.1.1 Within 30 days of the receipt of a grievance, the Social Carbon Foundation will publish the grievance and any associated supporting evidence or documentation on its website, unless the stakeholder has requested confidentiality. A ‘flag’ is automatically added to the project registry page stating that an investigation is being conducted but it is noted that this does not convey or assume either the accuracy or efficacy of the grievance nor the outcome (in other words the flag

represents transparency of investigation but does not assume fault or that any follow up rectification will be required)

- 5.1.2 Social Carbon Foundation will subsequently publish any additional records that become associated with the grievance, including, but not limited to, SOCIALCARBON's written response to the grievance, the investigation plan, and the resolution.
- 5.1.3 Translation of investigation plan and resolutions can be requested. The Social Carbon Foundation, at its discretion, may publish these documents in a language other than English, if required.
- 5.1.4 All comments, complaints and appeals shall be analysed for patterns and similar causes to facilitate continuous improvements and corrections to the system to prevent similar grievance in future.

## 6 Legal Disclaimer

- 6.1.1 The SOCIALCARBON Grievance procedure is not intended to be used to substitute, circumvent, or override the legal rights of any party to use judicial mechanisms, where available and appropriate.

## 7 Grievance Process Flowchart

<b>1</b>	Social Carbon Foundation (SCF) Team reviews grievance and assesses the eligibility and whether to proceed. The affected party is informed	30 days
<b>2</b>	SCF Team to notify parties, publishes the grievance to the website and flags in the registry	Within 30 days of submission
<b>3</b>	Appointment of grievance investigation team from SCF	Two weeks
<b>4</b>	SCF Team to draft the TORs to address the grievance and publish to website	Two weeks
<b>5</b>	SCF Team to perform the review, identifying and soliciting input & feedback from relevant parties and draft preliminary report to include issues, findings, facts, analysis and recommendations	90 days
<b>6</b>	SCF Team to share preliminary report with affected parties for feedback	15 days to provide feedback
<b>7</b>	Review and approval of preliminary report by Technical Working Group	30 days
<b>8</b>	Notify the Board and send final version of the report for feedback	Two weeks
<b>9</b>	SCF Team to share resolutions with parties for feedback	Two weeks
<b>10</b>	SCF Team to finalise report and publish to website	Two weeks

## Appendix 1: document history

Version	Date	Comment
V1.0	5 May 2023	Initial version released.