

IKI Independent Complaint Mechanism

Guidance for implementing organisations, 4.11.2022

1 Who are we?

The IKI Independent Complaint Mechanism (ICM) is intended to enable people who suffer (potential) negative social and/or environmental consequences from IKI projects, or who wish to report the improper use of funds or report retaliations in the context of an IKI project, to voice their complaints and seek redress. It also applies to employees of implementing organisations who wish to whistleblow on project related harm. In doing so, it should also contribute to:

- monitor and improve the environmental and social outcomes of projects,
- avoid unintended negative impacts of projects that go unnoticed by the IKI safeguards system, by ZUG and the three ministries BMWK, BMUV and AA,
- support the appropriate use of public funds, and
- comply with international good practice

The complaints mechanism is based at Zukunft - Umwelt - Gesellschaft (ZUG) gGmbH, Federal Government's project management agency for the IKI funding programme. The ICM is not integrated into the IKI office and its administrative hierarchy, but independent from the units responsible for the management of IKI projects. It applies to every IKI funded project, fund or facility and works together with the IKI office, the Ministries, and the implementing organisations in case a complaint is filed. With the change of leadership of the IKI, the lead responsibility for the complaints mechanism lies with the Federal Ministry for Economic Affairs and Climate Action (BMWK), which also works closely with the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV) and the Federal Foreign Office.

2 How is a complaint handled?

The ICM accepts complaints in any language. They can be submitted by post, email, fax, video or delivered in person to IKI ICM at ZUG gGmbH (address below).

- If the complaining party feels the need to not communicate by name, the complainant can decide whether to get in touch completely anonymous and remain so during the whole process.
- The ICM will first determine the eligibility of the complaint.
- If eligible, the ICM facilitates either a voluntary problem-solving process to identify and agree on solutions
- Where problem solving is not feasible or not effective or the complainants have stated otherwise, the ICM might alternatively a compliance appraisal and may investigate to identify any non-compliance with IKI policies and recommend redress
- The ICM monitors the implementation of problem solving agreements or any redress that is granted by the supervisory board.
- Investigations are lead by an independent expert panel.

3 What does this mean for implementing organisations?

- **Inform all project stakeholders, project and political partners as well as particularly project-affected persons about the IKI independent complaint mechanism and how to submit a complaint, e.g. in meetings, workshops, etc.**

Include information about the IKI complaint mechanism in your regular presentations of IKI as well as conversations about the project. Do not hesitate to contact the IKI complaints office if you need particular information, slides, handouts etc. This obligation applies also if the implementing organisation has its own mechanism.

- **Publish the IKI ICM on project websites etc (if applicable)**

Transparency and fair play are a key factor for IKI. Do include the IKI ICM on your project website so that project-affected people can easily find it.

Any person who believes they may be harmed by an IKI project or who wish to report corruption or the misuse of funds, can lodge a complaint to the IKI Independent Complaint Mechanism at IKI-complaints@z-u-g.org. The IKI complaint mechanism has a panel of independent experts who will investigate the complaint. In the course of the investigation, we will consult with the complainant so as to avoid unnecessary risks for the complainant. More information can be found at: <https://www.international-climate-initiative.com/en/about-iki/values-responsibility/independent-complaint-mechanism/>

- **In case you have your own complaint mechanism where you receive complaints: inform IKI complaint mechanism of complaints within 72h**

Some implementing organisations have their own complaint mechanism. If this mechanism receives a complaint related to an IKI funded project, please do inform IKI ICM within 72hrs.

- **Cooperate with visits of the IKI independent expert panel in case of complaints in a transparent manner**

In case of a complaint to the IKI ICM is eligible and an investigation takes place, please do cooperate with the mechanism by providing information as well as access to relevant persons and documents.

4 FAQs by complainants

- **Why use the Independent Complaints Mechanism?**

The ICM helps project affected people or communities address problems by convening dialogues or conducting investigations in a manner that is timely, fair and independent.

- **Does filing a complaint stop a project?**

No, not as an automated part of the process. Decisions to stop a project rest with the supervisory board taking into account the outcomes of an ICM process.

- **Is there a time-limit for making a complaint?**

Yes. Complaints must be lodged no more than three (3) years as of completed implementation of the IKI project (i.e. after the project term ends). The earlier the complaint is issued, the better ICM can handle your case and prevent further harm.

- **What outcomes can I expect from filing a complaint with the ICM?**

A timely and independent response to the complaint, a protection from reprisals and a fair process to address issues directly with the project or through an independent investigation that can recommend redress and/or a mediation/problem-solving procedure. The specific

outcomes depend on the individual problems raised in the complaint. Cases will only be transferred to law enforcement authorities in the country after consultation with the whistleblower.

- **Will I get a monetary or any other form of reparation?**

Usually the outcome will result in making the project compliant with IKI standards. Monetary or any other forms of reparation are not foreseen. While the expert panel recommends a certain course of action, decisions to reparation/redress rest with the supervisory board taking into account the outcomes of an ICM process.

- **What complaints can be handled by the ICM?**

Any person, group or community who believes they have been, or may be, harmed by an IKI project including those under consideration can file a complaint.

- **What information is needed?**

There is no special form required to submit a complaint. However, complaints should include the following information:

- Name and contact details of the person(s) or community filing the complaint. If the person wishes to remain anonymous, there will be an opportunity to do so via a digital mailbox with an anonymous dialogue function.
- A brief description of the IKI funded project or programme
- A description of the harm or impact occurred.
- If submitted by a representative, a letter from the affected person(s) or community allowing the representative to file the complaint with the ICM

Contact: IKI Independent Complaint Mechanism c/o ZUG gGmbH, Stresemannstrasse 69-71, 10963 Berlin, Germany. E-mail: iki-complaints@z-u-g.org
