



GOVERNANCE

GOLD STANDARD GRIEVANCE PROCEDURE

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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 Gold Standard itself, as well as, SustainCERT, Gold Standard Validation & Verification Bodies (VVBs) or the Oversight Body¹ (if any).

¹ Body that keeps an oversight on the performance of VVBs.

- 1.1.2 | The term “grievance” hereby refers to a “complaint,” “dispute,” “challenge,” “conflict,” and any similar term that expresses dissatisfaction with the Gold Standard procedure and functioning, including entities mentioned in 1.1.1 |above.
- 1.1.3 | The scope of the Gold Standard Grievance procedure is to provide a formal process for addressing grievances related to:
- Gold Standard policies, procedures (including Standard Setting) or personnel
 - Substantive complaints regarding the rules, requirements, content of the standard documents
 - SustainCERT performance matters (including the external experts appointed by SustainCERT to perform certification activity such as reviews, project site visits, etc.), Gold Standard VVBs or the Oversight Body (if any)
- 1.1.4 | It is not within the scope of the Gold Standard Grievance procedure to directly accept project related grievances as listed below. In these cases, stakeholders shall first submit concerns to the SustainCERT grievance procedure:
- 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
- 1.1.5 | Gold Standard as a stakeholder or on behalf of the stakeholder community, reserves the right to file a grievance against SustainCERT, VVBs or the Oversight Body and may open an investigation, as required.
- 1.1.6 | Gold Standard invites and welcomes comments or suggestions on any Gold Standard Requirements being developed and any update to its VVB Requirements from any individual or organisation following the procedure outlined in the [Standard Setting Procedures](#). Gold Standard reserves the right to 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 Gold Standard 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 criteria² 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
- a. Continuous learning: Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms
 - b. 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 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

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 Gold Standard 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 Gold Standard's ability to arrive at a full understanding and resolution of the grievance. Gold Standard 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 Gold Standard 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 Gold Standard principles, standards and procedures
- b. A grievance that relates to Gold Standard'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 | Grievance Procedure

4.1.1 | Any stakeholder may submit a grievance in the form of a written letter to the Gold Standard at any time. Such letters must include the following information:

- Name, organisation and contact details (email and telephone/skype) of the stakeholder (unless the grievance is submitted anonymously);
- 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 letters shall be sent to grievance@goldstandard.org with the subject line "Grievance Submission to the Gold Standard."

Following the receipt of a valid grievance, the Gold Standard will conduct a desk review to determine the extent of the alleged breach of the Gold Standard Requirements. Gold Standard will respond in writing within thirty (30) days of submission of grievance. If the grievance is found ineligible, Gold Standard will provide an explanation and a recommendation on how to address the grievance correctly, if possible. A grievance against a decision by SustainCERT is considered an appeal and will be dealt with following the appeal procedure managed by SustainCERT and not included in this document.

4.1.3 | Within 20 days of completion of initial review Gold Standard shall conduct an assessment to decide if an investigation is required, then the Gold Standard 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, Gold Standard, at its discretion may appoint an external agency to conduct the investigation and manage the grievance.

- 4.1.4 | Gold Standard 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 Gold Standard decides not to make the investigation report public.
- 4.1.5 | Following initial review, the Gold Standard 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, Gold Standard will follow the process summarised in the figure below to resolve the grievance, within the indicative timelines.
- 4.1.7 | Gold Standard shall conduct the investigation within 90 days after the initial review. Gold Standard 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, Gold Standard may request additional information from complainant. If complainant is non-responsive for more than 30 days during initial review or investigation, Gold Standard 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 | Gold Standard 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 Gold Standard 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 Gold Standard's investigation.

5| MAINTAINING RECORDS AND MONITORING ACTIONS

- 5.1.1 | Within 30 days of the receipt of a grievance, Gold Standard 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 | Gold Standard will subsequently publish any additional records that become associated with the grievance, including, but not limited to, Gold Standard's written response to the grievance, the investigation plan, and the resolution.
- 5.1.3 | Translation of investigation plan and resolutions can be requested. Gold Standard, 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 Gold Standard 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.

GRIEVANCE PROCESS

STEP 1	Secretariat to review grievance and inform affected party, to assess the eligibility and whether to proceed	30 days
STEP 2	Secretariat to notify parties, publish grievance to website and flag in the registry	Within 30 days of submission
STEP 3	Appointment of grievance investigation team from Secretariat and identify independent third-party reviewer	Two weeks
STEP 4	Secretariat to draft the TORs to address the scope of the grievance and publish to website	Two weeks
STEP 5	Secretariat 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
STEP 6	Secretariat to share preliminary report with affected parties for feedback	15 days to provide feedback
STEP 7	Review and approval of preliminary report by TAC or an appointed panel by TAC	30 days
STEP 8	Notify the Board and send final version of the report for feedback	Two weeks
STEP 9	Secretariat to share resolutions with parties for feedback	Two weeks
STEP 10	Secretariat to finalise report and publish to website	Two weeks