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***Via Electronic Mail***

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**Re: Comments on the Draft Standard Operating Procedures for the UNDP Social and Environmental Compliance Unit**

Dear Ms. Laughlin:

We, the undersigned organizations, are writing in response to the invitation to submit comments on the January 2014 Draft Standard Operating Procedures (“SOPs”) for the United Nations Development Programme (“UNDP”) Social and Environmental Compliance Unit (“SECU”). Following the Draft SOPs, this letter focuses on the UNDP’s compliance review process.

Our comments are based on the best practice principles of accessibility, fairness, transparency, effectiveness, independence, and professionalism. UNDP’s April 2012 Proposal for Environmental and Social Compliance Review and Grievance Processes (“Proposal”) rightly states that these principles “should be used as a benchmark for measuring the establishment, implementation, and evaluation of UNDP’s compliance review process.”<sup>1</sup> Our comments also draw on our experience directly supporting communities around the world to use accountability mechanisms to uphold environmental and human rights.

We appreciate UNDP’s incorporation into the Draft SOPs of a number of our comments on the Proposal in our letter dated June 18, 2012 to UNDP (“2012 Comments Letter”). However, some aspects of the Draft SOPs still need to be improved in order to satisfy the best practice principles. We also note that the Draft SOPs apply only to the interim phase of the UNDP compliance review mechanism, and that UNDP may be developing further operating procedures. This letter first makes recommendations on specific aspects of the Draft SOPs, before setting out our concerns about transparency and consultativeness in the process of developing the compliance review mechanism.

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<sup>1</sup> UNDP, *Proposal for Environmental and Social Compliance Review and Grievance Processes. Discussion Paper* (April 2012), p. 10 (hereinafter, “Proposal”).

## I. Comments on the Draft Standard Operating Procedures

### A. Ensuring Accessibility

The Draft SOPs incorporate many of the recommendations in our 2012 Comments Letter on the accessibility of the compliance review function. For example, they rightly clarify that complaints may be submitted by those *potentially* affected, and base eligibility determinations on whether there potentially are policy violations as opposed to direct harm. We have the following further recommendations on how the SOPs may improve accessibility.

#### 1. *Compliance review should be available to address past violations after UNDP involvement has ended*

Under the exclusion criteria listed in Section 8.2 of the Draft SOPs, complaints made after UNDP's role has ended and where its role can no longer be considered a cause of the concerns raised will be found ineligible. However, this provision may be interpreted to exclude complaints made after UNDP's role in a project or programme has ended but raises issues that were caused or facilitated by UNDP's past involvement. Complaints brought after UNDP support has ended concerning past policy violations should be allowed. There is no principled or practical rationale for cutting off UNDP's accountability for past policy violations whenever UNDP ceases its involvement in a project. UNDP would benefit from the chance for institutional learning and to prevent future mistakes and abuses.<sup>2</sup>

The eligibility of a complaint for compliance review should therefore be left open-ended. In response to public comments on the UNDP grievance mechanism, UNDP has stated that they intend "to allow access to the compliance and grievance mechanisms as long as impacts can be fairly and reasonably traced to UNDP's involvement. ... Rather than fixing a formal deadline for complaints tied to financial criteria, *UNDP is proposing that complaints may be brought at any time*, so long as the alleged impacts can plausibly be attributed to UNDP-supported activities (and in the case of the compliance function, impacts could plausibly be attributed to violations of UNDP policies)."<sup>3</sup> (Emphasis added.) Leaving eligibility open for past violations is consistent with this statement by UNDP.

#### 2. *SECU should broadly interpret the causal link between the UNDP's support and alleged impact in assessing eligibility*

The Draft SOPs are unclear about the connection required between UNDP's involvement in a project or programme and adverse impacts for a complaint to be eligible. The Draft SOPs suggest that a causal relationship is required between the UNDP's involvement and alleged impact, but this must be clarified in order to ensure that it is not be

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<sup>2</sup> Available compliance options include measures geared toward institutional learning and prevention of future recurrences, e.g. "public disclosure of non-compliance," "UNDP-wide recommendations for improving implementation," and "[c]ondition[ing] future UNDP participation in a project or programme on compliance with UNDP policies," Draft SOPs, section 10, p. 10.

<sup>3</sup> UNDP, *Comments on Proposed UNDP Accountability Mechanism and UNDP Responses* (comments from Global Consultation held April to July 2012), p. 23 (hereinafter, "UNDP Responses to Comments").

interpreted too narrowly.<sup>4</sup> The Draft UNDP Social and Environmental Standards require that due diligence includes “direct, indirect, cumulative, and induced impacts,” and it should be clear that the scope of the SECU also extends beyond directly caused impacts.<sup>5</sup> We commend the UNDP’s commitment to broadly interpret eligibility criteria to ensure accessibility, and we encourage that to be clearly stated in the SOPs.

3. *A re-filed complaint should be allowed when remedying past eligibility shortcomings*

The Draft SOPs allow for a complaint to be filed again when raising the same issues as a prior complaint only when there is significant new information or there has been significant change in circumstances. However, significant information or change is not defined. A new complaint raising the same issues as a prior complaint should be eligible if additional information helps overcome a prior ineligibility finding. This may not be “significant” new information, but important for the viability of the complaint, and should be considered sufficient to find a re-filed complaint eligible.

4. *SECU procedures should be strengthened to ensure complainants’ informed decision about compliance review and dispute resolution*

The Draft SOPs rightly allow complainants to choose whether to proceed with compliance review, dispute resolution, or both. However, they do not clearly require SECU to ensure complainants are adequately informed about these options.<sup>6</sup> The potential for complainants to be confused is greater with the UNDP grievance mechanisms than other similar mechanisms at other institutions, as the two functions are housed in different UNDP organizational units. Although UNDP has proposed that SECU will give all complainants information about both processes, and a proposed course of action that will help them make an informed choice about which process to undergo,<sup>7</sup> the language of the Draft SOPs does not clearly reflect this proposal.

5. *Potential complainants and informants, including non-UNDP staff, should be able to consult with the Ethics Office, including prior to filing a complaint*

The inclusion of provisions to protect complainants against retaliation for complaints is critical for ensuring accessibility to the mechanism. Although Section 8.5 provides for

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<sup>4</sup> Certain factors suggest that UNDP will require a causal relationship between its involvement and the adverse impact for a complaint to be eligible. According to UNDP, “[i]t is UNDP’s intention to interpret eligibility broadly to ensure the mechanism is accessible to all stakeholders potentially affected by UNDP-supported projects, with the understanding that there must be a plausible causal relationship between UNDP’s involvement and the risk of potential harm to some person or group.” See UNDP Responses to Comments, p. 22. Also, section 7 of the Draft SOPs provides that, in relation to reporting potential violations, reports should describe adverse impacts “that may be caused” by the UNDP-supported activity.

<sup>5</sup> This requirement is for projects that are determined to be high risk. UNDP, *Social and Environmental Standards, Draft for Public Comment* (March 3, 2014), para. 36.

<sup>6</sup> Draft SOPs, section 8.4, makes it only discretionary for SECU to provide information to the Complainant about “the potential for” either compliance review, dispute resolution, or both.

<sup>7</sup> UNDP Responses to Comments, p. 13.

persons who have reported allegations of UNDP non-compliance or cooperated with an investigation to seek protection against retaliation from the Ethics Office, the Ethics Office and the Policy for Protection against Retaliation it applies are intended to protect UNDP staff, interns, and volunteers. We ask UNDP to clarify how Section 8.5 will be amended to protect non-UNDP staff complainants using or considering using the UNDP grievance mechanism. If it applies only to UNDP staff, UNDP should enact the necessary policies and procedures to expand the provision's protection to non-UNDP staff who submit complaints, report on possible UNDP non-compliance, or cooperate in SECU investigations.

In addition, the current language in Section 8.5 only protects those who have already reported non-compliance issues or cooperated with an investigation, and not those who are too afraid or intimidated to raise their voices. The provision should be extended to those who are considering reporting issues of non-compliance and fear retaliation or retribution, so that they can consult the Director of the Ethics Office to better understand their options prior to filing a complaint.

*6. SECU should clarify that affected persons may participate in SECU-initiated compliance investigations*

The Draft SOPs do not consider the interaction between affected persons and investigations triggered on SECU's own initiative.<sup>8</sup> SECU-initiated compliance investigations should not be conducted in isolation from the public; as recognized by UNDP, environmental and social compliance has a public orientation.<sup>9</sup> The SOPs should require SECU to inform affected persons about compliance investigations it initiates, and allow them to participate in a manner similar to complainants, as long as affected people are not placed in danger. If non-compliance is found and mitigation measures are put in place, procedures should be created to ensure all affected people receive compensation for harm. The SOPs for SECU-initiated investigations should, similar to the Draft SOPs, include provisions for making draft terms of reference and reports public, and for interested parties to comment on these documents.<sup>10</sup> SECU should also consider referring affected persons in a SECU-triggered investigation to dispute resolution.

*7. SECU outreach to affected people should be done in coordination with the Dispute Resolution Support Office*

Outreach will be essential to promote affected peoples' access to and use of SECU, and we commend the use of various modes of informing people about the mechanism.<sup>11</sup> Joint outreach by SECU and the Dispute Resolution Support Office, or dispute resolution staff at the country level, will be important to ensure that affected people are aware of both functions available to them prior to filing a complaint. Joint outreach should not only be done via both offices' websites, but also in print directly to UNDP-supported project and programme

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<sup>8</sup> Draft SOPs, section 7, provides for compliance investigations to be triggered on SECU's own initiative by the Lead Compliance Officer, or at the request of the UNDP Administrator.

<sup>9</sup> Proposal, p. 4.

<sup>10</sup> These provisions include Draft SOPs, sections 8.3, 9.1, and 9.2.

<sup>11</sup> Draft SOPs, section 3.

affected people. Outreach coordination will ensure that resources are not being duplicated, and that information about how the mechanisms relate to each other is not confusing.

## B. Ensuring a Fair Outcome

### 1. *SECU procedures should allow complainants to amend their complaints during the compliance review*

The Draft SOPs do not stipulate procedures by which complainants can amend their complaints, allege new violations, or provide additional information or evidence.<sup>12</sup> Allowing amendments will make the process more flexible, fair, and accessible to all complainants who need to initiate a process while collecting data or information to support their claims, and to those who discover new information or experience new harm after filing a complaint. Doing so shows sensitivity to the circumstantial, resource, and capacity constraints commonly faced by many complainants. Amendment procedures should also allow the terms of reference for the investigation to reflect any new allegations and evidence submitted during the eligibility assessment phase.

### 2. *Complainants should be able to comment on draft compliance review reports before they are made available to the public*

The Draft SOPs provide for the distribution of draft compliance review reports to be made available to the public at the same time they are made available to complainants.<sup>13</sup> Given that these reports may contain sensitive information that could affect peoples' welfare and safety, complainants should be given the opportunity to review the draft reports for factual accuracy and to comment before SECU makes the draft reports available to the public.

### 3. *Where comments from complainants and the public conflict, complainants' views should be given priority*

We commend the Draft SOPs for opening the compliance review process to participation not just from complainants, but also the public, thereby allowing public oversight to serve as a check on the process. There may however be situations where the views and interests of the public conflict with those of the complainants. In such situations, the views and interests of the complainants should be given priority in a particular investigation, as they are the ones directly impacted by the process.

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<sup>12</sup> The Draft SOPs therefore fail to implement the UNDP's statement that "[c]omplainants are always free to provide new evidence in an ongoing compliance (sic), and/or file an additional or new complaint based on new evidence" and that the specific modalities for doing so "will be developed as part of the operating procedures for the mechanism." UNDP Responses to Comments, p. 23.

<sup>13</sup> Draft SOPs, section 9.1, provides that after SECU issues a draft compliance review report to OAI Director, it will "subsequently be released to UNDP staff, the Complainants, and the public."

4. *SECU procedures for conducting interviews with complainants and project-affected persons needs to be more sensitive to their context and difficulties*

The SOP on Interview Guidelines issued in May 2013 by the Office of Audit and Investigation (“OAI”) Director (“SOP on Interview Guidelines”), prescribes a formal procedure for conducting witness interviews with, among others, complainants and other victims of the alleged violations. However, it does not contain adequate provisions to ensure that complainants and other project-affected persons are fully informed and able to meaningfully participate in such interviews.

Affected persons may come from vulnerable backgrounds and may be unfamiliar with or intimidated by the interview process. The SOP on Interview Guidelines should be revised to better account for their needs and interests. It should provide affected persons with advanced notice and full information disclosure prior to the interview. As being interviewed alone may be intimidating or culturally inappropriate depending on how it is conducted, complainants should be allowed to request an observer of their choosing.<sup>14</sup> The interviewee should also be given the opportunity to privately reject any proposed observer.

Where interpretation is required for the interview, key nuances may get lost in translation resulting in misunderstandings, especially where local dialects are involved. We suggest that affected persons be allowed to choose to have their interviews recorded for the purpose of ensuring that misunderstandings arising from interpretation issues may be subsequently clarified.<sup>15</sup>

5. *SECU should ensure that complaints can be made in, and that all documents are translated to, the complainants’ language*

While the SOP on Intake of Complaints and Eligibility Assessment (“Intake SOP”) mentions that intake systems will accommodate complaints in multiple languages, it does not specify which ones. It is important that the SOPs officially recognize that complainants can submit complaints in their local language. Furthermore, the Draft SOPs do not discuss translation of documents, including the draft and final terms of reference and compliance review reports. Without translation of all documents, it will be impossible for affected communities to meaningfully participate in the SECU process. The SOPs should state that all important documents, particularly those available for public comment, be translated into the local language.

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<sup>14</sup> This would strengthen the existing provision that “[c]ompliance Officers may on their own initiative, or for any other reason, invite an observer to attend the interview if after considering the cultural context of the interview they conclude that the observer’s presence is in the best interest of the investigation.” SOP on Interview Guidelines, para. 14.

<sup>15</sup> SOP on Interview Guidelines, para. 11 (“Audio or video recording of witness interviews shall be limited to exceptional cases, after consultation with the Lead Compliance Officer (for example, where there is limited time and the issues covered are highly specialised or complex and it may therefore be useful to be able to review the recording).”)

## C. Maintaining Transparency

### 1. *All complaints should be registered*

Although the Proposal provides that all complaints received will be registered,<sup>16</sup> the Draft SOPs provide that SECU will register the Complaint only “if appropriate.”<sup>17</sup> The Draft SOPs do not elaborate on what the appropriate circumstances are. It is also unclear if complaints will be registered when SECU “can immediately determine that the Complaint is ineligible.”<sup>18</sup>

The Draft SOPs should be revised to provide for the registration of all complaints. Automatic and mandatory registration of complaints aids the mechanism’s transparency and credibility; the ability of the public to see what is *not* eligible may be equally important as being able to follow eligible cases. Without registration and a formal determination of ineligibility, there is no transparency with which to evaluate whether the PCM is operating according to its rules.

### 2. *Complaints should be made public only after determining whether complainants are requesting confidentiality*

The Intake SOP states that during the registration phase, a complaint will be listed on the SECU website registry. However, there is no indication of when the contents of the complaint will be made public, if at all. We recommend that, after consulting with complainants about whether they want to keep their identities confidential, SECU should either publish the complaint, or in cases where that is not possible, a summary of the complaint should be published on the registry.

### 3. *Complainants should be allowed to comment on eligibility assessment reports*

We commend the inclusion of provisions in the Draft SOPs requiring SECU to give complainants and other interested persons the opportunity to comment on draft terms of reference for the investigation and draft compliance review reports. However, it does not do the same for eligibility assessment reports. Given that an ineligibility determination terminates complainants’ access to SECU at an early stage, caution is required during this stage to ensure that meritorious grievances are not denied consideration. Moreover, the Draft SOPs set out eligibility criteria that could be contentious.<sup>19</sup> To further strengthen

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<sup>16</sup> Proposal, p. 15 (“Within five business days of receiving a complaint for compliance review, the OAI compliance officer will register the complaint and acknowledge receipt of the complaint to the complainant. This is mainly an administrative step.”).

<sup>17</sup> Draft SOPs, section 8.

<sup>18</sup> Draft SOPs, section 8 (“If SECU can immediately determine that the Complaint is ineligible, it will notify the Complainant in writing.”).

<sup>19</sup> Draft SOPs, section 8.2. Examples of criteria that are not straightforward to apply include whether a complaint is filed fraudulently or for a malicious purpose, and whether new information or change in circumstances is significant enough to merit another compliance review notwithstanding an earlier complaint on the same issues.

transparency and enable a thorough decision-making process, the Draft SOPs should allow complainants to comment on draft eligibility assessment reports.

*4. The review of compliance review reports by the Director of the OAI should be more transparent and participatory*

Although complainants and other interested parties have the opportunity to comment on draft compliance review reports, the Draft SOPs do not require their comments to be submitted to the Director of the OAI for review or made public with the final compliance review report. To continue the participatory approach taken by the Draft SOPs, SECU should submit all comments to the Director of the OAI together with the final compliance review report.

Under the Draft SOPs, the OAI Director implicitly has the discretion to make amendments to compliance review reports.<sup>20</sup> The SOPs should be amended to require SECU to inform complainants of any substantive amendments made by the Director, and allow them to comment on the same.

*5. UNDP should give reasons for adopting compliance measures that deviate from those recommended in the compliance review reports*

The Draft SOPs implicitly give the UNDP Administrator the discretion to deviate from compliance measures recommended in SECU's final compliance review report.<sup>21</sup> For transparency and accountability, reasons should be given for any such deviations.

*6. SECU should inform and consult complainants or other affected persons when recommending interim measures*

The Draft SOPs do not provide for complainant participation or consultation in determining the interim measures for addressing significant, irreversible harm to complainants or other affected people.<sup>22</sup> For transparency and accountability, the SOPs should require SECU to inform and consult complainants or other affected persons in formulating recommendations for such interim measures. Complainants and other affected persons are often the best placed to give insights on the appropriateness of proposed measures and their foreseeable consequences.

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<sup>20</sup> Draft SOPs, section 9.2 (The Director, OAI, will review and submit the report to the UNDP Administrator with a copy sent to the requesters and released to the public.”).

<sup>21</sup> Draft SOPs, section 9.3 (“... the UNDP Administrator will make a final decision regarding what steps, if any, UNDP will take to bring the project or programme into compliance and/or mitigate any harm to the complainants.”).

<sup>22</sup> Draft SOPs, section 10.3 (“Notwithstanding the procedures set forth above, if at any time after receiving a Complaint the Lead Compliance Officer believes significant, irreversible harm to the Complainants or other affected people is imminent, the Lead Compliance Officer may recommend to the Administrator that UNDP take interim measures pending completion of compliance review.”).



7. *SECU's advisory function needs to be more transparent*

The Draft SOPs indicate that only advisory notes that raise complex issues will be released for public comment.<sup>23</sup> UNDP has also stated that whether advisory notes are publicly released immediately will be determined on a case-by-case basis by the compliance officer in charge, as “there may be rare instances where immediate public release of the advice may undermine the ability to make systemic reforms.”<sup>24</sup> We ask UNDP to clarify the circumstances where advisory notes will not be released for public comment, and where immediate public release would undermine the ability to make systemic reforms.

8. *All comments from complainants submitted during the compliance review process should be made public*

In the interest of transparency, all comments submitted by complainants in the course of a compliance review process should, with their consent, be made public on SECU's website. This will enable the public to have a fair and balanced understanding of UNDP and the SECU's performance.

D. Ensuring Effectiveness

1. *OAI Director should be given a defined time period to review the compliance review report*

The Draft SOPs generally encourage expeditious handling of complaints by prescribing time limits at most stages of the compliance review process. However, the review of the final compliance review report by the Director of the OAI has no prescribed time limit.<sup>25</sup> Allowing open-ended procedural steps may cause unnecessary delays while harm continues on the ground. The SOPs should accordingly prescribe a time limit for the OAI Director's review.

2. *UNDP should establish a compensation fund*

We greatly welcome the provision in the Draft SOPs for mitigation of harm, restoration of complainants to a pre-harm state as a compliance option, and defined consequences for violating UNDP's social and environmental policies.<sup>26</sup> However, mitigation of harm and restoration of complainants should not be contingent on the availability of financial resources.<sup>27</sup> Where a UNDP-supported project or programme has caused or contributed to harm, compensation is an obligation, and not a matter of convenience or chance. We recommend that UNDP establish a compensation fund in cases that warrant mitigation of harm or the restoration of complainants.

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<sup>23</sup> Draft SOPs, section 10.2.

<sup>24</sup> UNDP Responses to Comments, p. 32.

<sup>25</sup> Draft SOPs, section 9.2.

<sup>26</sup> Draft SOPs, sections 9.3 and 10.

<sup>27</sup> Draft SOPs, section 10, provides that the UNDP Administrator may decide “to restore claimants to a pre-harm state, in collaboration with the implementing partner, where the circumstances and financial resources allow for it.”

### 3. *SECU should have the authority to initiate thematic or sectoral compliance reviews*

In addition to the UNDP Administrator and Lead Compliance Officer having the ability to initiate compliance review processes in specific cases, they should also be allowed to initiate thematic or sectoral compliance reviews when concerns arise about structural social and environmental non-compliance within a certain group of UNDP-supported projects or programmes. The current definition of “proactive investigation” does not restrict a broad investigation into a group of projects or programmes, but this power should be made more explicit in procedures.<sup>28</sup> Thematic or sectoral compliance reviews will support SECU in fulfilling its purpose to “protect locally-affected communities and, in particular, disadvantaged and vulnerable groups,” by ensuring that structural issues in UNDP projects and programmes are not causing harm,<sup>29</sup> and are consistent with the *Charter of the Office of Audit and Investigations*.<sup>30</sup>

## II. **Concerns about the process of developing the UNDP compliance review mechanism**

The Proposal envisages that the UNDP social and environmental compliance review mechanism will begin with a pilot and evaluation phase before being scaled up.<sup>31</sup> We have the following concerns about this process:

- The interim compliance review and grievance process should be transparent and accountable. We ask UNDP to clarify the development and status of the interim compliance review and grievance process, and any subsequent stages of mechanism development. UNDP should also provide for an easily accessible online platform for the public to view information on cases that have gone through the interim process. UNDP should ensure that the public has the opportunity to participate at all stages of development.
- The timelines and implementation plan for the development of the compliance review mechanism need to be more clearly defined and transparent. The Draft SOPs include four different related SOPs issued in May 2013. The public is only now able to comment on these SOPs, though it is unclear if they are already in effect and if there are other SOPs that have been developed. UNDP should make public all SOPs related to the compliance review mechanism, any plans to develop additional SOPs, and timelines for public comment and implementation.

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<sup>28</sup> SOP on Proactive Investigations, para. 3.

<sup>29</sup> Draft SOPs, section 1.

<sup>30</sup> Draft SOPs, section 1, which defines a compliance investigation as “A systematic, documented process of objectively obtaining and evaluating evidence to determine whether UNDP-supported activities are in conformance with applicable UNDP social and environmental norms.”

<sup>31</sup> Proposal, p. 25.

- As having clear and certain procedural rules ensures fairness, the Draft SOPs should not be mere guidelines. Even though they apply only to the interim phase of UNDP compliance review mechanism, changes to the Draft SOPs should be made at a systemic level rather than on an *ad hoc* basis, and in a transparent, consultative, and accountable manner.

We appreciate this opportunity to comment on UNDP's Draft SOPs. We invite members of UNDP working on this initiative to contact us with any questions regarding our comments. We look forward to continued communication in the creation of the UNDP Environmental and Social Compliance Review and Grievance Processes.

Sincerely,

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