

Grievance and Response Mechanism

UN Global Compact Network Italy

January 2024

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1. INTRODUCTION

The UN Global Compact Network Italy is a Participation Foundation founded in Italy in 2013. It has been registered in RUNTS (Italian Single Third Sector Registry) as a non-commercial ETS since 2023.

The Foundation contributes to the promotion and dissemination at national level of the *Ten Principles* of the *United Nations Global Compact*, a special initiative of the SG established in 1999, in the four following areas: Human Rights, Labour, Environment and Anti-Corruption, and the 17 SDGs (Sustainable Development Goals) outlined in the UN 2030 Agenda. The work of the Italian Network takes the form of participation in the UN global programme, supporting companies working towards sustainable development, and facilitating partnerships and multi-stakeholder dialogue on the subject with civil society, academia and institutions.

The Grievance Policy relates to the handling of grievances and complaints arising within the organisation from employees regarding possible negative impacts they have suffered and from external Stakeholders regarding grievances about Network operations.

2. GENERAL PRINCIPLES

2.1 Reference Standards

The Global Compact Network Italy took inspiration for its Grievance Policy from the following reference standards: document “Grievance Handling by Ilo” and the OECD Guide “Due Diligence for Responsible Business Conduct”, as well as, of course, the 10 UNGC Principles and the “Good Governance Guidelines” approved by the Board of Directors in February 2021.

2.2 Principles for internal grievance

In particular, the specific reference principles for handling **internal grievances** include:

1. Every worker has the **right to lodge a grievance** without prejudice.
2. **Every grievance must be investigated effectively and objectively** with a procedure open to discussion with other workers.
3. **Workers must not suffer any financial loss** as a result of the time spent handling the grievance procedure.
4. In the knowledge that voluntary solutions are preferable, if, however, **the worker** is not satisfied with the solutions adopted at the end of the internal procedure, **he/she may resort to conciliation, arbitration and in extreme cases judicial solutions, possibly with the support of trade union organisations, without thereby being subject to penalties in the workplace until the judgement is resolved.**

However, the principles for handling internal grievance are also applied together with those for external grievance as set out in section 2.3 below.

2.3 Principles for external grievance

The principles for handling **external grievances** include:

1. **fairness and correctness**: the conduct assumed in handling grievances is characterised by the utmost fairness vis-a-vis Stakeholders who, among other things, are treated impartially and without discrimination;
2. **independence**: guaranteed by the constitution of a collegial “Grievance Body” (GB) with the presence of the CB, ED, President and Vice President (if internal functions are directly involved in the grievance, they will be asked to abstain from evaluations due to an obvious conflict of interest and another Director will be appointed by the CB to ensure collegiality in handling the grievance);

3. **transparency:** accessibility of the evaluations carried out and their outcomes and maintenance of an archive by the CB. The ED is responsible for informing the UNGC of the cases that have occurred, interacting with the Integrity area and in compliance with Italian regulations for the evaluation of any input;
4. **confidentiality:** respecting and safeguarding the information of which the GCNI comes to obtain in accordance with current legislation on the protection of personal data;
5. **documentation storage and traceability:** data and information managed within the Mechanism as well as the documentation produced during all stages of the grievance handling process, whether in electronic or paper format, are traceable and appropriately stored and archived by the CB.

3. OPERATION OF THE STAKEHOLDER GRIEVANCE MECHANISM

3.1 Basic criteria

The operation of the entire mechanism may be ineffective if the complaint tool does not fulfil certain important criteria.

- Both internal and external Stakeholder grievances **will NOT be accepted anonymously**; the complainant will be guaranteed confidentiality and protection from potential discrimination or retaliation.
- Only grievances whose basis is a **negative impact on** internal/external **Stakeholders** will be considered by the Grievance Mechanism.

3.2 Grievance presentation

Complaints should be made in writing, by contacting the following email addresses:

Internal complaints:

hr@globalcompactnetwork.org
p.palombelli@studiopalombelli.it

External complaints:

d.bernacchi@globalcompactnetwork.org
m.frey@globalcompactnetwork.org
p.palombelli@studiopalombelli.it

The complaint must contain the following information:

data of the person submitting the grievance: full name and address, telephone number and, if possible, email address;

grounds of the grievance: a clear description of the reasons for the grievance, and the alleged negative impacts produced or potentially produced by it; possible violation of existing regulations;

contacts with GCNI: where applicable, indication of the names of GCNI employees with whom the applicant has already had contact;

possible resolutions: a clear description of the actions (which, if any, have already been proposed to try to resolve the grievance).

3.3 Grievance evaluation

The “collegial Grievance Body” will assess the grievance received, according to its seriousness, by sending a written answer to the person who lodged it within a maximum of 15 days.

The response will state the reasons why the grievance is accepted or not, and the next steps for its resolution with an estimated timeframe.

Depending on the type of grievance, the GB will consider the involvement of the Board, the involvement of UNGC and any external consultants (labour consultants, lawyers, tax advisors, etc.).

In complex cases, an attempt at mediation will be undertaken, which may include information sharing, fact-finding and dialogue with the complainant and other Stakeholders/employee witnesses. The mediation process takes as long as necessary to reach a solution, with the commitment of all participants. Throughout the duration of the mediation, a monitoring mechanism will be implemented, if necessary, to protect the Stakeholder from a recurrence of the case that gave rise to the report.

3.4 Grievance resolution

The last phase is the resolution of the grievance and the direct relationship with the complainant. In fact, those who complain must receive clear answers.

In closing the case, an agreement should be reached with the complainant about the remedy or – if applicable – compensation and, therefore, both parties should sign the closing of the case and the results jointly achieved.

3.5 Monitoring and learning

Each year, the CB will keep a grievance register containing the following information:

1. Number of grievances received
2. Eligible / Ineligible
3. Average grievance response time
4. Type of grievance
5. Consensual and amicable resolution
6. Resolution in court

The objective of the measurement in terms of timing and recurrence of types is for GCNI to improve its performance and redefine processes and procedures when similar occurrences and crisis situations are repeated.

4. ROLES AND RESPONSIBILITIES

Grievance Body, in the role of analysis manager

The Grievance Body consists of CB, President, Vice-President and ED. The collegial Body with cross-cutting skills carries out analyses of the issues raised, if necessary relying on external experts, possibly also involving other figures within the organisation or the Board according to the cases and specialised skills required. The GB draws up the final report with a remedy recommendation for the President and, depending on complexity, for the Board of Directors.

Should a member of the Body have a conflict of interest in relation to a specific grievance, they must give prior and immediate notice thereof to the other members, specifying in particular the reasons. In particular, a conflict of interest arises where, with reference to the specific grievance, the impartial and objective exercise of the activities of an evaluative nature envisaged as a member of the Body is compromised.

In such cases, where the other members of the Body agree by majority vote on the actual existence of the conflict, they shall inform the conflicting member of the need to:

- refrain from making any evaluations;
- inform the Board of Directors for the possible replacement of the conflicting member.

The President as legal representative

Approves the Final Report outlining the outcome of the analyses of the grievances raised and the proposed resolution. In the case of litigation, informs the Board of Directors and shares strategic direction with other Directors, then provides guidance to the ED and GB to proceed with resolution.

Board of Directors as the Body responsible for defining the general Foundation guidelines

It is periodically informed about the activities related to the Grievance Mechanism and the monitoring activities of the proposed corrective actions. The Board of Directors is only involved in the most serious cases and/or involving legal action.

The Controlling Body (CB) as the Body responsible for supervising compliance with the law and the Statute

Maintains the annual case monitoring register, chairs and coordinates the work of the GB.

ED as contact point with UNGC and responsible for organisational management

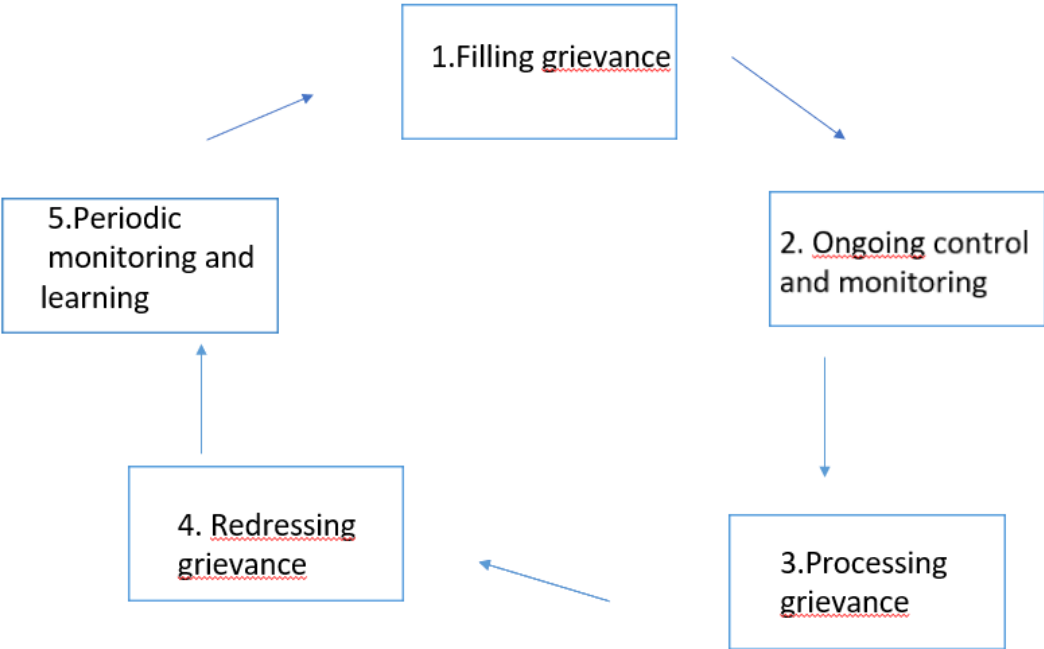
Coordinates with UNGC to update and transpose GCNI-related grievance guidelines, whether received in Italy or through UNGC's New York offices. It is a proposing party within the GB to listen to Stakeholders and collect information that can support the grievance analysis.

Vice-President as deputy of the legal representative if the President is unable to act

Supports the President in the decision-making process and replaces him/her in the event of a conflict of interest or inability to hold office.

Annexes

Annex 1 – GCNI Grievance Flow Chart



Data of complainant

Name and Surname/Company Name*

Tax Code/VAT No.*

Address (street, square)*

House no.*/Postal code*

Municipality*/Province*/State*

Name and Surname/Company Name*

Indicate a contact address for further information

Email

Certified email (if available)

Telephone*

IN THE EVENT OF GRIEVANCE SUBMITTED BY A LEGAL REPRESENTATIVE

Subject / Organisation

Representative

Attach explicit proof of the representative authority

Grievance subject

In this section, specify the subject of the grievance/complaint

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In this section, specify the place and circumstances to which the grievance relates and the presence of any witnesses and/or supporting written documents (see Annexes)

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Annex 1	
Annex 2	
Annex 3	

In this section, provide a clear indication of the reasons for the grievance and the negative impacts suffered/ which may be suffered in the near future

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In this section, provide any other useful information, e.g., alleged violation of regulations

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In this section, provide any contacts related to the grievance that have already been had with GCNI contacts, employees/Board Members/CB and solution proposals already received by the complainant

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Place Date and signature of complainant

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Annex 3 – GCNI grievance registry example

Grievance registry							
Year	Number of grievance received	Eligible	Non eligible	Average grievance response time	Types of grievance*	Consensual and amicable resolution	Resolution in court
2024							

*Codify and insert filters based on cases, e.g., sexual harassment, discriminatory events, failure to meet sponsorship contract deadlines with participants etc.