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INSTITUTIONAL GRIEVANCE REDRESS MECHANISM

GOVERNANCE MAP

Approval status: Pending approval by the Board of Directors, expected on December 1, 2026
Effective date: To be recorded upon approval
Responsible function: Designated GRM responsible function
Governance oversight: Ethics and Integrity Committee / Board of Directors
Classification: Public and available on the RFUS website
Review cycle: At least every three years or earlier when required

QUICK REFERENCES:

Document	Primary audience	Main question it answers	Level	What it should contain	Public
Ethics & Integrity Committee - Terms of Reference ToR	Board of Directors, Committee members, Executive Director, senior management	Who provides governance oversight of the GRM and handles escalated governance concerns?	Governance	Committee mandate; oversight responsibilities; escalation arrangements; conflicts and recusal; relationship with the GRM and Independent Investigation Function	Yes
Institutional Grievance Redress Mechanism – Terms of Reference	Board of Directors, Committee members, management, designated GRM personnel, GCF assessors/auditors	What is the GRM, what authority does it have, and how is it governed?	Institutional function	Purpose, scope, authority, responsibilities, impartiality safeguards, reporting arrangements, capacity and relationships with other accountability mechanisms	Yes
Institutional Grievance Redress Mechanism – Policy and Procedure	Designated GRM personnel, staff, management, stakeholders and their representatives	How are grievances submitted, assessed, addressed and closed?	Operational	Eligibility; reporting channels; accessibility; receipt, acknowledgment and registration; screening and assessment; referral or resolution; timelines; complainant communication; confidentiality; non-retaliation; escalation; monitoring, closure and records	Yes
Institutional Grievance Redress Mechanism – Governance Map	Communities, partners, staff, management, Board and Committee members, GCF assessors/auditors	How does the GRM fit within RFUS's accountability system?	Visual summary	Organizational relationships; intake and coordination; resolution, referral and escalation routes; separation of grievance resolution, investigation and governance oversight; conflict safeguards	Yes
Integrated Grievance Reporting Form	All stakeholders, including community members, affected persons, implementing partners and personnel	How can I submit a grievance or report suspected misconduct?	Reporting tool	Clear submission instructions; identified, confidential and anonymous reporting options; description of the concern; optional contact details and supporting information; confidentiality and non-retaliation information; accessible language versions	Yes, online form
Integrated Investigation Function, GRM, and PSEAH Complaints Focal Point – Appointment Memorandum	Executive Director, Board of Directors, Committee members, designated personnel, GCF assessors/auditors	Who coordinates intake, referral and follow-up across the GRM, investigations and PSEAH complaints?	Appointment record	Designated position; effective date; coordination responsibilities; reporting and independent escalation arrangements; survivor-centered handling and referral; conflict and recusal requirements; limits on authority over investigations	No — internal; may be provided confidentially to GCF

1. RFUS ACCOUNTABILITY ARCHITECTURE

Level / Entity	Relationship	Description & Key Functions
RFUS Board of Directors	Top Authority	Ultimate governance and strategic oversight of the institution.
Ethics and Integrity Committee	Oversight & Escalation	Independent ethical oversight, governance review, and escalation point for sensitive matters.
Integrated Investigation Function, GRM and PSEAH Complaints Focal Point	Intake, coordination and referral	Receives or coordinates receipt of reports; checks conflicts of interest; securely records and routes concerns through the applicable GRM, investigation or PSEAH procedures without requiring resubmission. Coordinates appropriate complainant communication and, for PSEAH complaints, survivor-centered handling and referral under the applicable policy.
Institutional GRM	Grievance resolution and remedy	Receives, screens and addresses grievances through appropriate referral, facilitated resolution and monitoring of remedies. Refers allegations within the Independent Investigation Function's mandate to that Function for independent assessment.
Independent Investigation Function	Independent assessment and investigation	Independently assesses allegations and determines whether an investigation is warranted. The assigned investigator retains professional responsibility for investigative scope, methodology, evidence assessment, findings and the final report.
Management / Operational Functions	Implementation	Responsible for executing corrective actions and managing operational accountability.
Project /Activity-Level GRMs	Local Access	Accessible local entry points, where established, for activity-specific concerns. Their use is not a prerequisite for access to the RFUS Institutional GRM where direct access is appropriate under the GRM Policy, or to applicable external grievance mechanisms.
Communities / Affected Persons	Stakeholders	Ultimate beneficiaries and stakeholders to whom the architecture is accountable.

The Director of People and Culture serves as the integrated focal point for the Investigation Function, GRM and PSEAH complaints, coordinating these distinct mandates without automatically serving as the investigator. The focal point may conduct an internal investigation when appropriately designated, qualified and sufficiently independent under the Investigation Function Terms of Reference. As an ex officio, non-voting member of the Ethics and Integrity Committee, the focal point does not count toward quorum and shall not participate in Committee oversight or deliberations concerning matters they handled, except to provide requested factual or procedural information. Where the focal point is implicated or conflicted, the applicable alternative reporting and reassignment arrangements apply.

2. HOW THE SYSTEM WORKS

A. Institutional Grievance Redress Mechanism (GRM)

Primary role: Accessible institutional entry point for grievances and concerns.

Receives:

- Community and stakeholder grievances
- Environmental and social concerns
- Project/activity concerns
- Concerns regarding stakeholder engagement
- Operational complaints
- Concerns regarding discrimination, exclusion or abuse of power
- Other concerns related to RFUS activities

Core functions:

Receive → Acknowledge → Register → Screen → Refer/Resolve → Monitor → Close → Learn

The GRM does **not** conduct formal investigations where the matter falls within the mandate of the independent Investigation Function.

B. Investigation Function

Primary role: Independent fact-finding and investigation of allegations requiring formal investigation.

Receives referrals concerning:

- Serious misconduct
- Fraud and corruption, where applicable

- Serious violations of RFUS policies
- Harassment and other serious misconduct
- Safeguarding/SEAH matters within its mandate
- Retaliation
- Other allegations requiring independent investigation

Independence safeguards:

- Independent from the subject of the investigation
- Conflict-of-interest assessment
- Authority to obtain relevant information
- Appropriate confidentiality
- Direct escalation of sensitive matters
- External expertise where internal independence cannot be assured

The Investigation Function operates under its approved **Terms of Reference and Investigation Procedures and Case Management Guidelines**.

C. Protection of Whistleblowers and Witnesses Policy

Primary role: Protected reporting mechanism for individuals reporting suspected wrongdoing.

Covers, as applicable:

- Fraud
- Corruption
- Financial misconduct
- Serious wrongdoing
- Retaliation
- Other reportable misconduct defined by the Protection of Whistleblowers and Witnesses Policy

The Whistleblower mechanism operates according to the **RFUS Protection of Whistleblowers and Witnesses Policy** and may refer matters to the Investigation Function.

Key principle:

> A person does not lose whistleblower protections simply because the concern is initially submitted through another RFUS reporting channel.

D. Ethics and Integrity Committee

Primary role: Independent ethical and governance oversight in accordance with its approved Terms of Reference.

The Ethics and Integrity Committee may:

- Review significant ethical matters
- Receive escalated grievances
- Address matters involving senior leadership
- Address conflicts of interest affecting the normal process
- Review systemic ethical concerns
- Provide governance-level recommendations
- Escalate matters to the Board of Directors where appropriate

The Ethics and Integrity Committee does **not routinely conduct operational grievance handling or investigations**.

The Ethics and Integrity Committee exercises governance oversight and independent review within its mandate but does not direct the conduct, methodology, scope, findings or reporting of investigations assigned to the Investigation Function. Where a Committee member has an actual, potential or perceived conflict of interest, that member shall recuse themselves in accordance with the GRM Terms of Reference.

E. Project / Activity-Level Grievance Mechanisms

Primary role: Accessible first-level mechanism for concerns arising directly from specific projects, programs or activities.

Project-level mechanisms should:

- Be accessible to affected communities;
- Be culturally appropriate;
- Be available in relevant languages/formats;
- Provide clear reporting channels;
- Protect complainants against retaliation;
- Maintain appropriate records;
- Provide timely responses; and
- Connect to the RFUS Institutional GRM.

For GCF-financed activities, RFUS retains institutional responsibility for ensuring that appropriate grievance mechanisms are established and functioning.

3. REFERRAL AND ESCALATION PATHWAY

Stage	Description / Pathway
Stakeholders	Community Members, Affected Persons, and Stakeholders
Entry Point	Project/Activity-level GRM OR RFUS Institutional GRM
Screening	Initial Screening and Triage of the submitted concern
Path	**1. Routine:** GRM Resolution / Facilitated Remedy **2. Specialized:** Safeguarding / SEAH / Other Appropriate Mechanism **3. Formal:** Referral to Investigation Function
Findings	Independent Findings and Final Report (where applicable)
Remedy	Competent Authority for Remedy and/or Corrective Action
Implementation	Implementation and Monitoring of the agreed actions
Closure	Formal closure of the grievance following completion of the applicable process
Learning	Systemic Learning and feedback into the accountability architecture
Governance Escalation	Ethics and Integrity Committee / Board of Directors (as required by mandate)

Governance escalation is not an automatic stage in every grievance or investigation. A matter shall be referred or escalated to the Ethics and Integrity Committee, Board of Directors or another independent governance mechanism only where required by the nature or significance of the matter, senior-leadership involvement, an actual, potential or perceived conflict of interest, systemic institutional risk, a threat to the independence of the process, or a decision requiring governance-level authority. The Ethics and Integrity Committee and Board of Directors exercise oversight and decision-making within their respective mandates but do not direct the conduct, methodology, scope, findings or final reporting of investigations assigned to the Investigation Function.

SPECIAL INDEPENDENCE ROUTES

Situation	Independence Route / Escalation
Senior Management	Independent Route → Ethics and Integrity Committee
Executive Director	Ethics and Integrity Committee or Board of Directors-Designated Independent Mechanism → Board of Directors (where required)
Ethics and Integrity Committee Conflict	Recusal → Board of Directors
Board of Directors Member Conflict	Recusal → Non-Conflicted Board of Directors
Board of Directors Chair Conflict	Vice-Chair or Other Non-Conflicted Board of Directors-Designated Route
Independence Cannot Be Secured Internally	Independent External Mechanism

4. SPECIAL REFERRAL RULES

Situation	Primary route	Independent escalation
Complaint involving GRM personnel	Independent reassignment	Ethics and Integrity Committee, where required
Complaint involving senior management	Independent GRM route / Investigation Function, according to subject matter	Ethics and Integrity Committee
Complaint involving the Executive Director	Ethics and Integrity Committee or Board of Directors-designated independent mechanism	Board of Directors, where required
Complaint involving an Ethics and Integrity Committee member	Recusal + non-conflicted Ethics and Integrity Committee members	Board of Directors if independence cannot be secured

Complaint involving Ethics and Integrity Committee Chair / Committee as a whole	Board of Directors or an independent external mechanism designated by the Board of Directors	Independent external mechanism where required
Complaint involving a Board of Directors member	Non-conflicted Board of Directors members / independent mechanism	Independent external mechanism where required
Complaint involving Board Chair	Vice-Chair or non-conflicted Board-designated mechanism	Independent external mechanism where required
Conflict of interest generally	Recusal and reassignment	Independent external mechanism where necessary

5. INDEPENDENCE SAFEGUARDS

RFUS shall maintain the following safeguards across the accountability architecture:

1. Separation of functions

Receiving a grievance, investigating an allegation and making governance decisions are distinct functions.

2. Conflict-of-interest management

Anyone with an actual, potential or perceived conflict must recuse themselves.

3. Escalation outside management

Complaints concerning senior leadership shall have an independent escalation pathway.

4. Confidentiality

Information is shared only on a legitimate need-to-know basis.

5. Non-retaliation

Individuals raising concerns or participating in a process are protected from retaliation.

6. Access to independent expertise

RFUS may use external investigators, mediators, safeguarding specialists or other independent experts where necessary.

7. Governance oversight

The Board of Directors receives appropriate aggregate information and can intervene when institutional independence is at risk.

6. ACCOUNTABILITY FLOW

<table>
<tr><th colspan="3">STAKEHOLDERS & REPORTING</th></tr>
<tr><td colspan="3">Accessible Reporting Channels → GRM / Project GRM → Screening & Triage</td></tr>
<tr><th>RESOLVE</th><th>REFER</th><th>ESCALATE</th></tr>
<tr><td>Corrective Action</td><td>Investigation / Specialized Mechanism</td><td>Ethics & Integrity Committee</td></tr>
<tr><th colspan="3">GOVERNANCE & IMPROVEMENT</th></tr>
<tr><td colspan="3">Governance Oversight → Systemic Learning → Policy / Activity Improvement</td></tr>
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7. ACCOUNTABILITY TO STAKEHOLDERS

RFUS shall make accessible information available regarding:

- The existence and purpose of the GRM;
- Who may submit a grievance;
- How to submit a grievance;
- Available reporting channels;
- Confidentiality and non-retaliation protections;
- Expected timelines;

- Escalation options;
- Project-level grievance mechanisms;
- The RFUS institutional GRM; and
- Relevant GCF grievance and redress mechanisms for GCF-financed activities.

Information should be provided in formats and languages appropriate to the stakeholders concerned.

8. GCF ALIGNMENT

This governance architecture supports RFUS's ability to demonstrate:

GCF accreditation or integrity expectation addressed	**RFUS evidence**
Institutional grievance mechanism	Institutional GRM TOR and Policy
Independence	Governance structure, reporting lines and conflict-of-interest provisions
Adequate capacity	Designated GRM responsibility, training, resources and access to specialists
Accessibility	Multiple reporting channels and accessible public information
Fairness and impartiality	Screening, conflict-of-interest and escalation procedures
Predictability	Defined procedures and timelines
Transparency	Public GRM information and aggregate reporting
Protection against retaliation	Protection of Whistleblowers and Witnesses Policy and GRM protections
Independent investigation	Investigation Function TOR and Manual
Ethical oversight	Ethics and Integrity Committee TOR
Project-level accountability	Project/activity-level grievance mechanisms
Continuous learning	GRM trend analysis and governance reporting

9. GOVERNANCE PRINCIPLE

The RFUS accountability system is designed as an interconnected architecture rather than a single mechanism: the GRM provides accessible entry and redress; the Protection of Whistleblowers and Witnesses Policy provides protected reporting; the Investigation Function provides independent fact-finding; the Ethics and Integrity Committee provides independent ethical and governance oversight; and project-level mechanisms provide accessible resolution close to affected communities.

The mechanisms are complementary, not interchangeable.

10. DOCUMENT HIERARCHY

RFUS's bylaws and valid delegations establish organizational authority. Each approved policy and Terms of Reference governs its respective subject matter. Investigation Procedures implement the Investigation Function Terms of Reference; GRM procedures implement the GRM mandate; and project-level grievance procedures operate consistently with applicable institutional requirements. Whistleblower protection and safeguarding requirements apply across these processes. Governance maps summarize these arrangements and do not establish precedence between policies or amend their authority.