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COCOA
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Guidelines for grievance management

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This practical guide provides step-by-step guidance on managing grievances reported to community-based grievance mechanisms. It draws on ICI's experience in implementing and overseeing these mechanisms to tackle the risk of forced labour in cocoa-growing areas in Côte d'Ivoire and Ghana.

This guide is intended for stakeholders involved in the set-up and management of community-based grievance mechanisms. It supports implementing partners in understanding how grievances are processed and assists grievance committee members in handling cases effectively and consistently.

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Grievance mechanisms: An overview

What are community-based grievance mechanisms?

A grievance mechanism is a formal process that allows individuals to raise complaints about actions that may have impacted their human rights or labour rights. These mechanisms can be used to resolve disputes, investigate allegations of abuse, provide solutions for those affected, and ultimately prevent further harm. This document focuses on issues linked to employer-worker relations and the rights of workers.

Grievance mechanisms can be set up in various contexts and can take multiple forms. In the cocoa sector in West Africa, where labour relations are often informal and individuals may face barriers to accessing formal complaint channels, grievance mechanisms at the community level are particularly well-suited to address these challenges. This approach makes it easier for both workers and employers to voice their concerns and raise complaints. It is also particularly suited to identifying, preventing, and addressing risks of forced labour at an early stage, given its proximity to workers and communities.

Community-based grievance mechanisms can be put in place through community-level committees, such as Community Labour Protection Committees in Ghana or Community Human Rights Committees in Côte d'Ivoire. These bodies typically consist of seven to nine adult volunteers representing various segments of the community, including traditional authorities, farmer or employer representatives, workers' representatives, religious leaders, youth and women's representatives. Committee members assume specific roles, such as chairperson, secretary, and ordinary members, which help structure the committee's work and ensure the effective and transparent management of grievances.

How do community-based grievance mechanisms work?

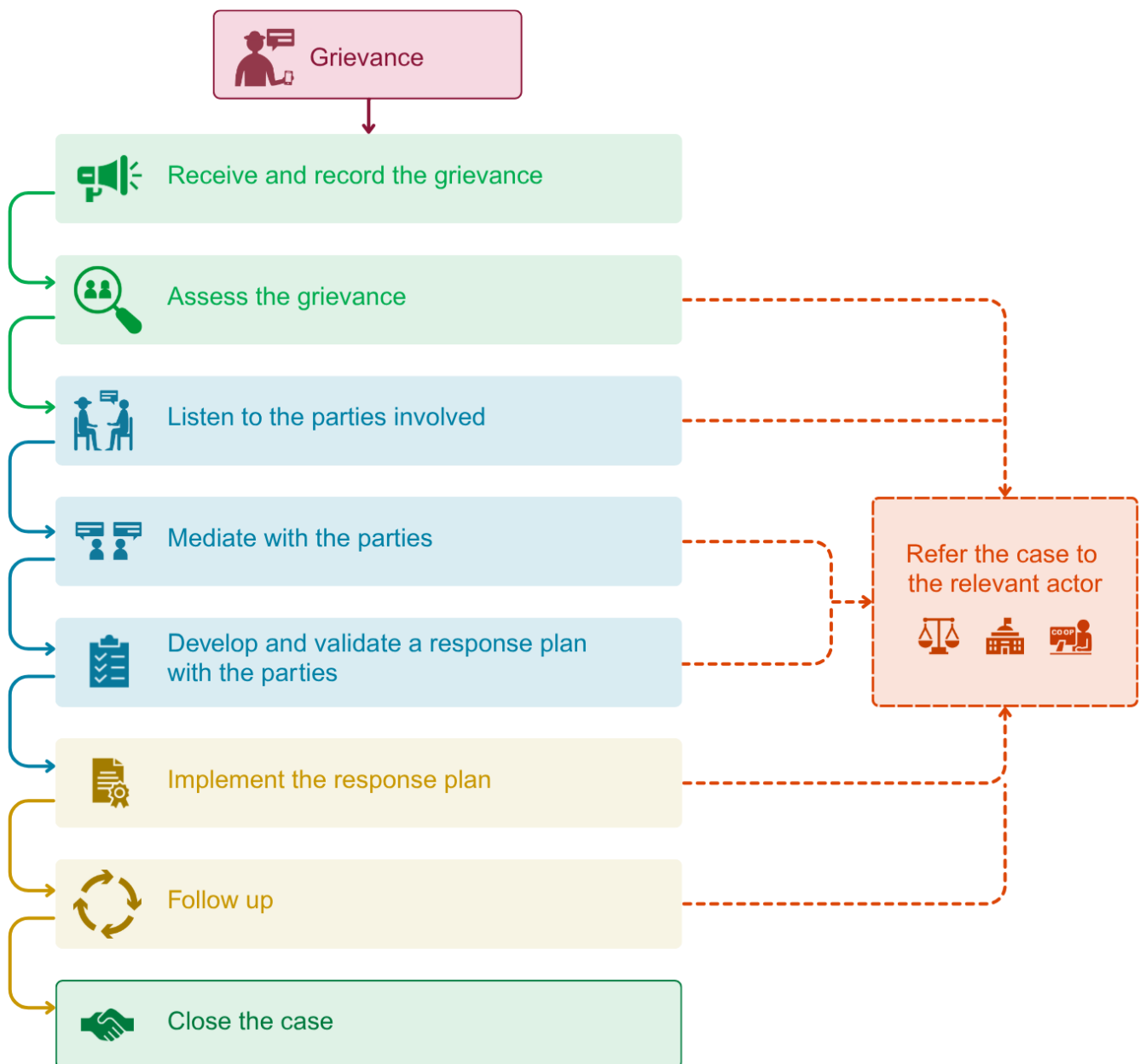
Community-based grievance committees listen to community members who raise grievances and work to resolve them. Common grievances in cocoa farming include withholding of wages, workers performing tasks that were not specified at the time of recruitment or workers refusing to perform tasks agreed upon at recruitment.

In cocoa farming, most worker-employer grievances can be successfully addressed through listening, mediation, and signing a formal employment contract, which can be handled by the community-level committees. However, some cases are more serious, for example, when there are threats of violence. In such instances, the committee refers the case to the relevant authorities, who have the mandate to resolve such cases.

In addition to managing grievances, community-level committees also engage in preventive activities. They raise awareness about labour rights and facilitate the signing of employment contracts between workers and employers to formalise working relationships and prevent any potential disputes. This approach helps ensure that labour rights are respected and reduces the risk of forced labour. Additionally, it helps build trust among community members in the committee and its crucial work.

How are grievances handled?

Community-based grievance mechanisms follow a structured process to ensure that grievances are handled consistently, fairly, and effectively. The diagram below provides an overview of the key steps involved in managing a grievance, from its receipt to its resolution.



This guide provides step-by-step guidance on managing grievances once they are reported to a community-based grievance mechanism. For further information on the roles and composition of community-based committees, their broader mandate, and practical guidance on setting up a community-based grievance mechanism, readers are encouraged to consult ICI's [Learning into Action](#) brief and [Implementation Guide](#) on how to set up community-based grievance mechanisms.

Handling grievances: Key principles and tools

The management of grievances must be guided by clear principles and supported by appropriate tools. These apply throughout all stages of the grievance management process.

Key principles

Impartiality and absence of conflict of interest

- Grievances must be handled **collectively** by the committee, and not by a single member, to ensure **transparency, fairness, and consistency**. Grievances must be handled by a minimum of 5 members.
- Committee members must act **impartially** at all times. Any member who has a conflict of interest in relation to a grievance must withdraw from handling that case.

Confidentiality

Confidentiality is a fundamental principle of the grievance mechanism and must be respected from the moment a grievance is received. Committee members must:

- **Never reveal the identity of a complainant** outside the committee without their consent.
- **Explain to the complainant who will have access to their information**, and what information will be shared.
- **Limit the number of people who have access to information** about the complainant's identity and the details of the grievance to the strict minimum, and only disclose information that is necessary to handle and resolve the grievance.
- Ensure **grievance data used for monitoring or improvement purposes is anonymised** and generalised, so that identities cannot be revealed, directly or by indirect association.
- **Inform complainants of the principle of confidentiality**, and of their protection against any form of reprisal. Also, keep them informed of the progress of their case.
- **Keep the [grievance recording workbook](#) in a secure location**, ideally a safe or secure box with restricted or locked access, to protect the personal and sensitive information it contains.
- **Do not allow visitors to access documented records** or take photographs of any section, given the personal and sensitive information they contain.
- **Sign a [confidentiality charter](#)** and commit to complying strictly with it, to protect complainants and committee members and to preserve the integrity of the committee.

Free of charge

Access to the grievance mechanism is **free of charge**. Committee members must not request or accept any payment or compensation at any stage of the process.

Tools

Handling grievances requires documenting information in a structured and secure manner. For this purpose, ICI has developed a [grievance recording workbook](#).

Each grievance must be recorded in the grievance recording workbook from the moment it is received through to its resolution or referral. Each grievance is assigned a **unique registration code**, which is used to track the case while protecting the identity of the complainant, where necessary.

The grievance workbook contains sensitive and personal information and must be **stored securely**, with access limited to authorised committee members (chairperson and secretary).

Besides the grievance recording workbook, ICI has developed a [Handbook for community-based grievance mechanisms](#) with guidance to support committee members in their roles, including detailed guidance on how to use the grievance recording workbook.

Definitions

- Complainant or aggrieved party – The person raising the grievance.
- Person against whom the grievance is raised or respondent – The individual whose actions are the subject of the grievance.

Handling grievances: Step-by-step guide

Step 1: Receiving and recording a grievance

Grievances may be submitted through different channels, including in person, by phone call, SMS, or via a grievance box – a post-box-like box placed in the community where grievances can be submitted. When a committee member **receives a grievance**, they should:

- Inform the complainant that access to the grievance mechanism is free of charge and that no fees may be requested at any stage of the process.
- Explain the principles of confidentiality, including who will have access to the information and how it will be handled.
- Where the complainant expresses a wish to remain anonymous, clearly explain the measures in place to protect their identity, including the committee's way of working, and that handling a grievance requires the involvement of several members who may have access to their information.

Upon receipt of a grievance, the committee member who receives it must inform the committee chair without delay. The chair or secretary must **record the grievance** in the official [grievance recording workbook](#), including basic details about the complainant and the person against whom the grievance is raised, as well as a brief description of the grievance. Recording the grievance generates a unique registration code, which must be communicated to the complainant.

If the complainant wishes to remain anonymous, no personal or identifying information should be recorded. The grievance registration code can be used to manage and track the case.

Recommended timeframe

Immediately, and within a maximum of 24 hours upon receipt of the grievance.

Grievance mechanisms should offer multiple accessible and trustworthy reporting channels to allow workers and employers to raise grievances. Community members may have different needs, literacy skills and trust levels, so it is essential that everyone can report grievances through a choice of methods that suit them.

Step 2: Assessing the grievance

Once the chair has been informed of a grievance, they should convene the committee to assess whether the case can be handled internally or whether it must be referred to an external body.

Committee members should make themselves available as soon as possible. **At least five members** should meet in person. Where it is not possible to gather at least five members to meet in person within a short timeframe, the chairperson or secretary must contact all the other committee members by phone to discuss any immediate actions.

At this stage, **access to personal and identifying information related to the grievance, such as the name of the complainant or the person against whom the grievance is raised, should be strictly limited.** Only the receiving committee member, the chairperson and the secretary should be aware of the identity of the complainant and the person against whom the grievance is raised. Other committee members should be

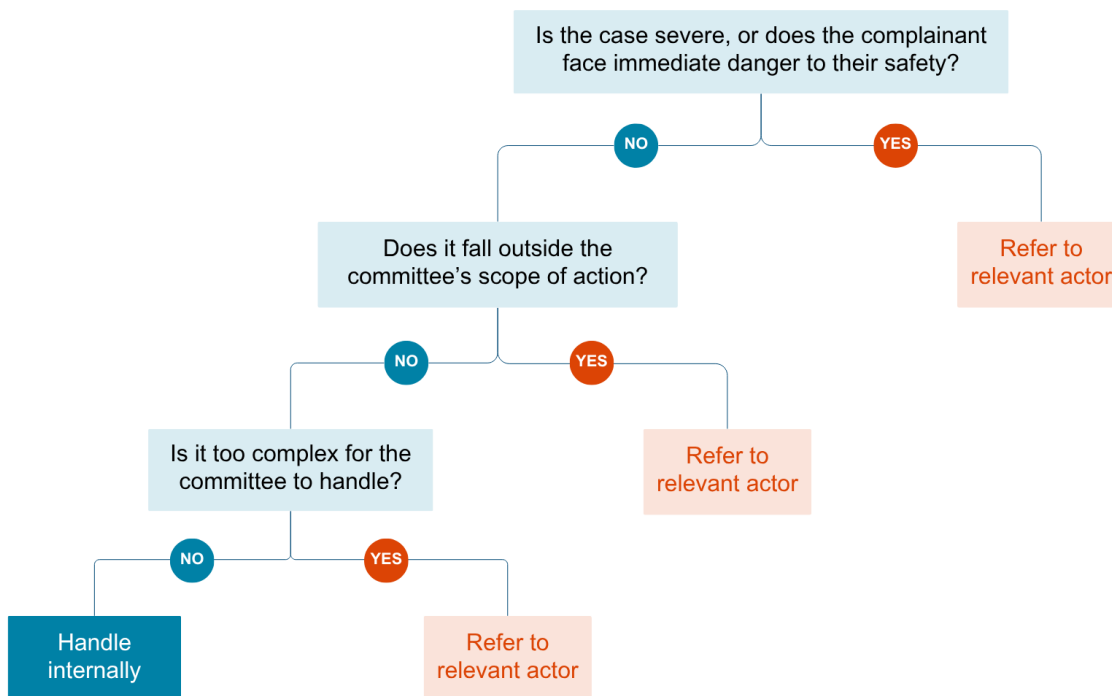
informed only of the nature of the grievance (for example, non-payment of wages, lack of a contract, or poor working conditions) to carry out the **initial assessment**.

Recommended timeframe

Within 48 hours (2 days) of receiving the grievance.

To determine whether the case can be addressed by the committee or needs to be referred to an external body, the committee assesses:

1. The severity of the grievance, including whether the complainant faces any immediate danger
2. Whether the grievance falls within the committee's scope of action
3. The complexity of the case



2.1 Assessing the severity and immediate danger

The committee must first evaluate the severity of the grievance, including whether the complainant faces any imminent danger to their safety.

To do so, committee members should consider whether any of the following situations apply:

- Is the complainant facing serious and/or repeated physical violence (assault and battery, sexual violence)?
- Is the complainant unable to leave the farm freely? Is their movement restricted? Or is their presence involuntary (e.g., trafficking or kidnapping)?
- Has the complainant had their identity documents confiscated?
- Has the complainant received threats of deportation or denunciation to the authorities (migrant workers)?

- Has the complainant been obliged to use drugs, substances or alcohol to work?
- Does the complainant (or those close to them) feel in danger?

Beyond these questions, other factors may also indicate high severity or immediate danger. For example, when a situation involves:

- Serious violations of rights
- Repeated abuses over time
- The accumulation of several indicators which, taken individually, might not appear severe but, when considered together, point to a high level of severity

Committee members should therefore assess each case on its own merits, taking into account the specific circumstances reported, to determine whether the grievance is severe, including whether the complainant's safety is at immediate risk.

→ If the committee believes the case is severe or that the complainant is in immediate danger, the case must be referred immediately to the competent authorities.

Assessing the severity of a grievance, including whether a complainant faces imminent danger, is **not a one-off exercise**. The committee must remain attentive to changes in the situation throughout the management of the grievance. New information collected during discussions, mediation, follow-up, or changes in the complainant's circumstances may indicate severity or imminent danger and require referral to the competent authorities at any stage.

2.2 Assessing the scope

If the grievance does not involve immediate danger, the committee should analyse whether it falls within its scope of action.

The committee's scope typically includes grievances related to:

- **Employment and contractual relations**, including disputes between the employer and the worker, or between workers, issues linked to occupational health and safety (unsafe working conditions, lack of protective equipment), labour rights abuses (including restrictions on freedom of association, salary disputes, working hours, etc).
- **Harassment and abuse**, including verbal abuse, insults or intimidation as well as threats of physical violence or assault, sexual or psychological abuse – these situations may indicate severity or imminent danger and require referral to the authorities (see above).
- **Child protection**, including child labour-related cases, when part of the mandate of the committee.

Cases outside the committee's scope of action can include issues linked to the management of cooperative premiums or family disputes, land tenure system, issues of spirituality, etc.

→ If the committee concludes the grievance is outside its scope of action, it should refer the case to the appropriate authorities or structures, with the complainant's agreement, or guide the complainant towards the competent services. This may include, where relevant, referring grievances related to the operation of the cooperative (such as the management of premiums) to the cooperative's complaint mechanism, such as Assess & Address or HRDD committees.

2.3 Assessing the complexity

If the grievance falls within the committee's scope and does not involve immediate danger, the committee should assess whether it has the capacity to handle the case.

Whether a grievance is considered too complex will depend on the committee's experience, capacity, and ability to address the situation effectively. A grievance may be considered complex, for example, if:

- The situation is particularly sensitive and difficult to address at the community level (e.g. cases involving children, persons in a situation of vulnerability, or minority groups)
- Many people are involved, making the situation difficult to manage or mediate
- The grievance involves multiple or interrelated issues, or an accumulation of indicators which, while not indicating severity on their own, go beyond the committee's capacity to address effectively
- Specialised expertise, protection measures, or institutional authority are required to handle the case appropriately

The assessment of complexity is based on the committee's judgment and perception of its own capacity.

→ If the grievance is too complex, it should be referred to the appropriate authorities or structures. If the committee is uncertain about its ability to handle a case effectively, it should refer the grievance.

What should the committee do when a case must be referred?

Where the committee determines that a grievance must be referred to the competent authorities, whether due to its severity, because it falls outside the committee's scope, or because it is too complex to handle, the committee must take the following actions:

- 1. Inform the complainant** that their case is being referred to the authorities and reassure them. Referrals should normally be made with the informed consent of the complainant. However, where obtaining consent is not possible or would delay action and increase the risk of harm, the committee may proceed with the referral. In such cases, the complainant should be informed as soon as it is safe to do so.
- 2. Refer the case to the competent authorities or structures.** Where the grievance involves immediate danger or risk of harm, referral must be made without delay. Not doing so may engage the liability of committee members for failure to assist a person in danger. In all other cases, referral should be carried out as soon as possible.
- 3. Inform implementing partners,** where applicable, for support and assistance throughout the process.
- 4. Inform the cooperative, buyer, or Licensed Buying Company (LBC),** where applicable. When the referred grievance is raised against a member of a cooperative, a buyer, or LBC, the committee chairperson may need to inform the cooperative, buyer, or LBC leadership to enable them to carry out their own due diligence. This information-sharing must take place only after the case has been referred to the competent authorities and may be carried out only by the chairperson or the secretary of the committee. When doing so, the chairperson or secretary must ensure that:
 - The information shared is strictly limited to the nature of the grievance and the name of the member against whom the grievance is raised.

- Information about the complainant is not shared with the cooperative, buyer, or LBC, except if the complainant is a member of the cooperative, buyer, or LBC and has consented.
- The complainant is informed in advance that information related to the grievance and the person against whom the grievance was raised will be communicated to the cooperative, buyer, or LBC.

The purpose of this information-sharing is to enable the cooperative, buyer, or LBC to conduct their own due diligence and take appropriate follow-up actions in line with the outcome of the official procedure. The investigation process remains under the responsibility of the competent authorities. The cooperative, buyer, or LBC must not interfere with this process, except where support to victims is required.

- 5. Follow up on the referral.** The committee should also follow up with the complainant to ensure that the referral has been effective and that the case is receiving appropriate attention. This applies whether the referral was made directly by the committee (with the complainant's consent or at their request) or by the complainant themselves. Referral updates should be recorded in the grievance recording workbook.

What should the committee do when the case can be handled internally?

Grievances must be handled collectively, rather than by a single committee member, to ensure that decisions are discussed and agreed by several members and that each step is properly documented, supporting transparency, impartiality, and consistent handling of cases. At least **5 members** should be involved for standard cases.

However, where a complainant is concerned about disclosing their identity to a larger group, the case may, in exceptional circumstances, be handled by a restricted group of three members, generally including the chairperson, the member who received the grievance, and one additional member. This arrangement applies after the initial assessment, which is always conducted collectively and on an anonymised basis.

If a complainant refuses to allow the involvement of the minimum number of committee members required, the committee may only play an advisory role. In such cases, the grievance is discussed collegially by the committee in anonymised form, and proposed solutions or advice are communicated to the complainant by the receiving member.

The member who received the grievance should serve as the **focal point for communication** with the complainant throughout the process.

What happens if a grievance is reported by a witness?

When a grievance is reported by a witness, the committee should listen to the witness and assess the case, in line with the criteria above. Where appropriate, the committee should seek to contact the potential aggrieved person in a safe, secure, and confidential manner to gather additional information and to ask whether they wish to receive the committee's support or be referred to other services. Where it is safe to do so, the committee may also conduct a field visit to better understand the situation. If the committee is unable to contact the person because of a risk to the person's safety, the committee should refer the case to the competent authorities. If the person cannot be reached for other reasons, for instance, if they have left the area, the case may be closed, and the witness informed accordingly.

The identity of the witness must be protected at all times and must not be disclosed without their consent.

Step 3: Listening to the parties involved

Once a case has been deemed appropriate for handling by the committee, the committee organises a meeting with the complainant to listen to the grievance and gather any additional information as needed. Following this exchange, members discuss possible solutions and inform the complainant of the next steps.

The committee also organises a meeting with the person against whom the grievance is raised to inform them that the matter has been referred to the committee and to invite them to share their account of the events.

If one of the parties wants to involve a witness, the committee organises a meeting with that person to gather additional information. This may take place either separately or as part of a joint discussion with the other parties, depending on the situation and the parties' preferences.

Recommended timeframe

Within 72 hours (3 days) of receiving the grievance.

Step 4: Mediating with the parties

Following the individual meetings with each of the parties involved, the committee facilitates a mediation process to support dialogue and the identification of possible solutions.

The committee invites the parties involved in the grievance to meet together. Witnesses may also be invited if needed. During these exchanges, the parties are given the opportunity to present or clarify their account of the events and are informed of their rights and responsibilities, particularly in relation to labour relations.

If the parties do not wish to meet jointly, the committee may organise separate meetings with each party.

If one or both parties refuse to engage in mediation or are unwilling to discuss the grievance, the committee should advise the complainant to report the case to the competent authorities. In such cases, the committee should support the complainant by providing relevant contacts or facilitating referral to the appropriate structures or authorities.

Recommended timeframe

Within 48 hours (2 days) of the individual meetings (step 3).

What does mediation look like in practice?

- Mediation may require several meetings. Committee members should meet as often as necessary to support a fair and effective resolution.
- The committee may adjourn mediation sessions, gather additional information from the parties or witnesses, and hold further discussions, jointly or separately, as needed.
- If a party raises concerns about the impartiality of one or more committee members, those members must recuse themselves and abstain from participating in the handling and resolution of the grievance.
- Information related to the mediation process, including meeting dates and committee members involved, should be recorded in the grievance recording workbook.

Step 5: Developing and validating the response plan

At the end of the mediation process, the parties are encouraged to propose solutions, ideally jointly. In exceptional cases, solutions may be proposed separately, but the committee must find a middle ground to the solution. If the parties are unable or unwilling to propose solutions, the committee may suggest possible options.

Based on the mediation discussions, the committee members jointly develop a final response plan outlining the agreed or proposed solutions. The response plan may be developed during a mediation session with the parties or finalised subsequently by the committee members in consultation.

What are examples of possible solutions?

The response plan may include one or more of the following measures, depending on the nature of the grievance:

- Signing a contract
- Financial compensation
- Restitution of wages owed
- Restitution of identity documents or other assets
- Termination of the working relationship
- Share-cropping arrangements (farm or beans)
- Provision or return of equipment
- Involvement of technical and financial partners (e.g. referring the case to a specialised institution, NGO, cooperative, or service provider for support such as training, equipment, or financial assistance)

Once the response plan has been developed, the committee presents it to the parties for validation. This should ideally take place in a joint meeting, although it can also happen separately in exceptional cases.

The parties are invited to review the proposed solutions and approve them. Once approved, committee members update the grievance recording workbook.

If either one of the parties refuses to approve the plan, additional mediation sessions may be organised. If further mediation efforts are unsuccessful or if no resolution can be reached, the case should be referred to the relevant authorities.

Recommended timeframe

Within 24 hours of the last mediation session or exchange with the parties (step 4).

Step 6: Implementing the response plan and following up

Once the response plan has been validated by the parties, the agreed actions should be implemented in line with the commitments made.

Committee members should support and **regularly follow up** on the implementation of the response plan until the case can be declared solved or closed. The committee's level of involvement will depend on the nature of the agreed actions. In some cases, this may be limited to checking in regularly with the parties to ensure that the response plan is being implemented as agreed. In other cases, committee members may be more directly

involved, for example, by facilitating the signing of a contract. In other cases, the committee members may facilitate the process for payment of wages or other benefits that may have been withheld.

Follow-up should be done regularly, not as a one-off action, until the case can be declared solved or closed.

If implementation proves impossible due to a lack of cooperation or if commitments are not respected, the committee should advise the complainant to refer the case to the competent authorities and support referral as appropriate.

Recommended timeframe

Actions should ideally be initiated within one week of the response plan being validated by the parties.

Step 7: Closing the case

Once the grievance has been resolved, the committee closes the case and records all relevant information in the grievance workbook, including meeting dates, response plan, resolution information.

A case may also be closed once it has been effectively referred to and handled by the competent authorities.

Once the case is closed, the committee should inform the complainant accordingly.

What happens if a complainant wants to withdraw the case?

Raising a grievance to the committee is voluntary, and a complainant may decide to withdraw their grievance at any stage of the process. In such cases, the grievance should be closed and recorded accordingly.

However, if the withdrawal appears suspicious, for example, if it may be linked to fear of reprisals, threats, or intimidation, the committee should assess the situation carefully and may need to alert the competent authorities and refer the case.

Recommended timeframe

After follow-up and complete resolution

Additional resources

- [Learning into action: Community-based grievance mechanisms to address forced labour risks](#)
- [Implementation Guide: Setting up community-based grievance mechanisms in cocoa communities | ICI Cocoa Initiative](#)
- [Grievance recording workbook](#)
- [Handbook for community-based grievance committees to address forced labour risks](#)

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