



# Complaint Attention Mechanism

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## I. Background

The Fund for the Promotion of Protected Natural Areas of Peru – Profonanpe is a non-profit institution of private law and public interest, established in 1992, with the purpose of managing the National Fund for Protected Natural Areas (FONANPE) and other resources that may be transferred, in accordance with the provisions of the regulations of the Protected Natural Areas (PNA) Law<sup>1</sup>.

Profonanpe is responsible for raising, managing and administering financial resources for the implementation of various interventions that contribute to the conservation of biological diversity, mitigation and adaptation to climate change.

It is currently the only Environmental Fund in Peru. It was accredited for the first time in 2014 by the Adaptation Fund, and renewed its accreditation in early 2021 as a National Implementing Entity (NIE). It has also been accredited by the Green Climate Fund (GCF) since 2015.

Profonanpe has an Environmental and Social Management System, consisting of a set of policies, strategies and tools to identify, monitor and evaluate the environmental and social risks of the implementation of interventions. The Complaint Attention Mechanism (MAQ) is a tool that integrates this system.

This mechanism is aimed at the different actors involved in Profonanpe's actions, as well as in the implementation of its interventions. It also contributes to the defense of human rights, the search for effective participation of the parties, access to information, and the promotion of social welfare and sustainable development.

Profonanpe's complaint attention mechanism is based on national legislation, the institution's internal guidelines, social and environmental policies, and Profonanpe's manual of mission processes and job profiles<sup>2</sup> (MOP). It also follows the international guidelines and recommendations of different cooperation funds, such as the World Bank, the Green Climate Fund, the Inter-American Development Bank, among others.

In addition, this document is based on the experience of Profonanpe's complaint attention mechanisms for the different interventions implemented by Profonanpe. These experiences have made it possible to strengthen the proposed complaint resolution process so that it is agile and robust, ensuring communication and satisfaction of the various stakeholders involved, as well as attention to their demands. Finally, the aim is to standardize the procedures that have been implemented at Profonanpe over the years.

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<sup>1</sup> Supreme Decree N°038-2001-AG

<sup>2</sup> Preliminary version June 2021

## II. Legal Framework

- Decree Law N° 26154, which creates the National Fund for Protected Natural Areas by the State (FONANPE), which designates Profonanpe as its administrator.
  - Supreme Decree N° 001-2021-MINAM, which approves the Internal Regulations of Profonanpe.
  - Law N° 27444, General Administrative Procedure Law, whose scope of application covers legal entities under the private regime that provide public services or exercise administrative functions.
  - Supreme Decree N° 002-2009-MINAM, approving the regulations on transparency, access to public environmental information and citizen participation and consultation in environmental matters. Article 22.
  - Unique Ordered Text of Law N° 27806, Law on Transparency and Access to Public Information, approved by Supreme Decree N° 043-2003-PCM.
  - Supreme Decree N° 072-2003-PCM, which approves the Regulations of the Law on Transparency and Access to Public Information.
  - Unique Ordered Text of Legislative Decree N° 728, Law on Labor Productivity and Competitiveness.
  - DS-008-2019-MIMP, National Gender Equality Policy
  - DS-003-2015-MINCU, National Policy for the Mainstreaming of the Intercultural Approach
  - DS-013-2019 - MINEDU, National Youth Policy
  - Ministerial Resolution 330 -2020 - EF/15, which approves the Operations Manual of the Green Climate Fund.
- **International Instruments:** Profonanpe's complaint attention mechanism is also built considering the following international legal instruments:
- The Universal Declaration of Human Rights.
  - The American Convention on Human Rights.
  - The International Labor Organization's Convention concerning Indigenous and Tribal Peoples in Independent Countries 169 (ILO Convention 169).
  - The United Nations Declaration on the Rights of Indigenous Peoples.
  - The United Nations Educational, Scientific and Cultural Organization (UNESCO) Convention Concerning the Protection of the World Cultural and Natural Heritage.
  - The Convention on Biological Diversity (CBD).
  - The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).



### III. Objective

The purpose of this complaint attention mechanism is to establish the roles and functions, as well as the procedures for resolving complaints generated within the framework of Profonanpe's processes and interventions, in order to address them in a pertinent and timely manner.

#### Specific Objectives:

- Identify and resolve the causes of complaints in a timely manner to mitigate potential social conflicts and/or environmental impacts.
- Provide information on the causes of complaints in order to prevent them, as well as strengthen monitoring and/or internal control mechanisms, as the case may be.
- Describe the instances, roles and functions in each phase of the complaint resolution process.
- Contribute to the implementation of environmental and social safeguards in Profonanpe's interventions, especially those related to stakeholder participation and involvement<sup>3</sup>.
- Contribute to the feedback of Profonanpe's internal processes, as well as to the monitoring of the interventions implemented.

### IV. Principles and approaches

The complaint attention mechanism is based on the following principles:

- **Accessibility:** promotes awareness and access to the mechanism by all stakeholders.
- **Predictable:** the procedures for dealing with complaints are clear and known to the stakeholders involved.
- **Transparent:** information on the mechanism is available in various channels, such as in person or online, as well as on the cases resolved.
- **Equitable:** affected parties are encouraged to have reasonable access to the sources of information, advice and expertise necessary to participate in the process of addressing their complaints in a fair, informed and respectful manner.
- **Based on participation and dialogue:** consultation with stakeholders involved in complaints is promoted, as well as dialogue as a means to address and resolve them.

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<sup>3</sup> See document "Safeguards Manual"

- **Continuous learning:** lessons are identified from the complaint handling process to improve the complaint mechanism and prevent future complaints and damages.
- **Legitimacy:** promotes trust and is recognized by stakeholders, as well as fair and impartial conduct in the complaint resolution process.
- **Confidentiality:** adopts measures to support the citizen making the complaint; keeping the personal data and information provided confidential.
- **Prevention:** promotes actions that prevent or mitigate the environmental and social impacts or risks of the intervention and possible generation of conflicts, through the resolution of doubts and consultations in a timely manner.

Likewise, the complaint attention mechanism contemplates the following approaches:

- Human rights-based approach; because the values, principles and universal norms of human dignity, such as life, liberty, equality, security, social welfare and any other aspect that seeks to guarantee human rights, whether individual or collective, as in the case of indigenous or native peoples, prevail.
- Equality approach; because it must be accessible and understood by the general public, guaranteeing equality between women, men and vulnerable populations. Promotes actions that mitigate negative situations that ignore the presence of women, prioritizing their interests and needs in a differentiated manner.
- Intercultural approach; because it must be understandable and accessible in native languages and contexts where the interventions are developed. It incorporates and values the different cultural visions, ancestral knowledge, respecting the identity of the population where the intervention is carried out.
- Intergenerational approach; because actions resulting from complaint management consider the impact on current and future generations.

## V. Definitions

### Complaint:

It is the manifestation of dissatisfaction or non-conformity formulated by a person or entity associated with the action or inaction in the different interventions in which Profonanpe participates.

The following are some examples:

- If the person responsible for providing technical assistance, within the framework of an intervention, repeatedly fails to comply with the established schedule without prior notice to the beneficiaries.
- If the population primarily speaks a language other than Spanish and the activities do not include local translators.
- Whether the institution's personnel have sexist or discriminatory attitudes.

- As part of the management of an intervention, when payments to service providers have not been made in accordance with the established schedule on a recurring basis.

### **Intervention:**

Includes the various actions in which Profonanpe participates and carries out directly or indirectly through programs, projects, subprojects, training, events, campaigns and activities within the framework of its assigned competencies and responsibilities.

## **VI. Scope**

The complaint attention mechanism covers all the actors involved in the interventions in which Profonanpe participates. Therefore, collaborators, consultants and suppliers that provide services, regardless of the contractual regime and/or source of financing, should be aware of and promote the dissemination of this management tool that contributes to the improvement of institutional processes.

It is important to note that under no circumstances can Profonanpe's present mechanism for dealing with complaints hinder the implementation of an intervention. On the contrary, the objective of this mechanism is to build bridges of dialogue and agreements between the beneficiaries and the population in general with the management units of the interventions; in order to conclude in proposals for improvement in favor of the environment and the quality of life of the populations.

### **Of institutional instruments:**

For the attention of the complaint, the code of ethics, administrative guidelines, the policy of equity, diversity and inclusion, Profonanpe's environmental and social policies, as well as the norms for the prevention and fight against corruption, terrorism and other internal control norms developed by the institution will be considered.

### **Of existing complaint mechanisms:**

Interventions that already have complaint mechanisms in place, for the resolution of complaints, will seek articulation and complementarity with the provisions of this Mechanism, without this generating non-compliance with the guidelines of the respective donors. Therefore, the following is established:

- **Of interventions related to the National Service of Protected Natural Areas (SERNANP):** They should consider Presidential Resolution N° 076 -2021-SERNANP for the resolution of complaints generated in the framework of the implementation process. This resolution establishes the procedure for dealing with complaints, queries and suggestions.

- **Of other interventions with operating mechanisms:** In these cases, the complaints received must be resolved through the complaint attention mechanism approved for such intervention.

Complaints that are sent and entered through Profonanpe's Consultation, Suggestions and Complaints Mailbox (hereinafter referred to as the "mailbox"), and that are linked to interventions that have a complaints mechanism in operation, will be referred to them after evaluation by Profonanpe. In this regard, it will be the DIME, through the social specialist, who will inform the coordinator of the intervention in order to resolve the complaint. However, it is important to emphasize that the procedure for these cases involves continuous follow-up until the complaint is resolved. Likewise, the citizen should be informed of the referral of the complaint.

#### Of the resolution of the complaint in special cases:

In case a common understanding is not reached between the parties involved for the resolution of a complaint, or if the affected person is not satisfied with the response given by Profonanpe, he/she may appeal to another instance that he/she deems appropriate.

If the complaint remains unresolved or unsatisfactory for the affected person, he/she may refer it to the complaint mechanisms of the international cooperation funds, as the case may be. Cooperation funds such as the World Bank, the Green Climate Fund, the Inter-American Development Bank, among others, have independent complaint mechanisms for interventions carried out by accredited entities that do not comply with their environmental and social policies. However, they appeal to the complaint mechanisms of the accredited entities to promote dialogue between the interested parties until a satisfactory solution is reached for those involved.

- **Of the Environmental Remediation Contingency Fund:**

The Contingency Fund was created in 2015 through Law N° 30321 and its purpose is the creation of the Fund for the financing of environmental remediation actions of sites impacted as a result of hydrocarbon activities, in the geographical area of the basins of the Pastaza, Tigre, Corrientes and Marañón rivers, located in the department of Loreto, and which involve risks to health and the environment and merit priority and exceptional attention from the State.

The decision-making body responsible for the execution of the Fund, as well as for monitoring, reporting and periodically disseminating the results of the remediation measures implemented is the Board of Directors. The Administrative and Financial Technical Secretariat of the Board of Directors is provided by Profonanpe, which keeps the minutes and agreements of the ordinary and extraordinary sessions.



Likewise, Profonanpe, through the Environmental Liabilities Program and in its role as Administrative and Financial Technical Secretariat of the Contingency Fund, is responsible for managing the resources of the Contingency Fund for Environmental Remediation, contracting consulting and remediation companies, monitoring the resources used in the remediation of impacted sites, reporting the progress made in the environmental remediation process, and coordinating and articulating the participation of indigenous organizations with the public entities involved in the process of environmental remediation of impacted sites.

In view of the above, any complaints that may arise within the framework of this intervention are subject to the Contingency Fund's own governance framework and its specific regulations, as they have the status of law. However, Profonanpe, in its effort to promote a pertinent attention to citizens, may mediate so that such complaints are attended to; but under no circumstances may it be directly responsible for the delay or non-resolution of such complaints, except in cases where the complaint is related to the functions performed by Profonanpe as Technical Secretariat.

#### Of the completion of a registration:

Once the corresponding actions for the resolution of the complaint have been carried out and the Complaint Resolution Form (*Form N°2, see Annexes*) has been completed, the registration of the complaint is considered completed and should be recorded in the Follow-up Matrix (*Form N°3, see Annexes*).

Likewise, a registration will be considered finalized if upon requesting key information for the resolution of the complaint, the citizen does not submit the information required by Profonanpe. The term stipulated for the citizen to comply is twenty (20) calendar days; otherwise, the registration will be considered terminated.

## VII. Typology of complaints

The typology of complaints may vary as interventions are implemented. However, as a baseline, the following typologies have been considered:

1. **Disclosure of information**, when there are insufficient and inadequate information dissemination mechanisms. For example, the activities to be carried out by the intervention in a given territory have not been disseminated by any means.
2. **Environmental and Social Safeguards**, linked to how the risks and negative and positive impacts generated by the implementation of an intervention are addressed and managed, as well as elements linked to Profonanpe's eleven (11) Environmental and Social Policies, which include aspects such as stakeholder

participation, gender, indigenous or native peoples, cultural heritage, among others.

3. **Administrative**, aspects related to management, transparency and accountability of administrative and financial issues.
4. **Integrity**, linked to inadequate attention and relationship with the intervention personnel, the existence of an action or omission in the attention or request made on the part of the actors involved in the intervention, conflicts of interest and other aspects that contravene institutional principles and the code of ethics<sup>4</sup>.
5. **Others** that are not considered in the previous items.

## VIII. Stakeholders

The following is a description of the actors involved in the process of complaint attention.

- Persons or groups benefiting from the interventions, associations, grassroots organizations and other local stakeholders involved in their implementation.
- Intervention Management Unit.
- Administrative assistant.
- Environmental and Social Policy Specialist.
- Social/environmental specialist of the Monitoring and Evaluation Directorate.
- Director of Monitoring and Evaluation.
- Head of Research and Development.
- Compliance and Integrity Officer.
- Administration and Finance Manager.
- Executive Director.

## IX. Communication channels for complaints

In accordance with the characteristics of the institutional actions and the target public of the complaint mechanism, 3 communication channels are contemplated, which are culturally relevant and accessible to the stakeholders involved:

- a) **In person**: The *Complaint Registration Form (Form N°1, see Annexes)* will be used in spaces such as assemblies, information sessions, workshops, training sessions, among others that bring together the stakeholders involved and where the intervention management unit, user areas or implementing entity

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<sup>4</sup> See <https://profonanpe.org.pe/integridad/>

participates. Complaints can also be made at the Profonanpe Office, located at Parque Gonzales Prada Ave. N°396, Magdalena del Mar-Lima; in the physical mailbox at.

- b) **Virtual:** Profonanpe's web page has a virtual mailbox through which stakeholders can submit their complaints. The link to access the virtual form is <https://profonanpe.org.pe/en/quejas/>. The following e-mail address is also available: [quejas@profonanpe.org.pe](mailto:quejas@profonanpe.org.pe).
- c) **Telephone:** this communication channel is relevant for the various stakeholders who have limitations with the use of the Internet or those who, due to distance, only have satellite telephones. This measure may be adopted in the medium term, given the costs that its implementation may generate. The hours for dealing with complaints by this means should be established and publicized. Likewise, personnel should be assigned to attend to this means of communication, and to complete *Form N°1*. It is suggested that the personnel assigned to this function be the person in charge of the Front Desk, who, once the complaint is received, will refer it to the social specialist of the DIME to continue with the corresponding levels of attention detailed in the present mechanism.

## X. Structure and operation

In order to ensure that complaints that may arise within the framework of institutional actions are dealt with, it is necessary to be clear about roles and functions. The following is a description of the general function according to Profonanpe's Mission Processes and Job Profiles Manual, and the following sections describe the details in detail:

- **Of the administration of the mechanism:** The Monitoring and Evaluation Directorate (DIME) is responsible for overseeing the functioning of the complaint mechanism. The social specialist is responsible for managing complaints received through the physical mailbox located at the Profonanpe office in Lima, the virtual mailbox located on the institutional website, as well as those derived from Profonanpe's different interventions. The social specialist, depending on the type of complaint, will coordinate with the corresponding areas to initiate the resolution process according to the respective attention flows.
- **Of the communication process:** The Office of Communication and Institutional Image, within the framework of its functions, will provide guidelines to ensure the strategic positioning, dissemination and reputation of the institutional

complaint mechanism. Likewise, each intervention will implement the mechanism's communication strategy, according to its scope of action<sup>5</sup>.

- **Of the follow-up and monitoring process:** The Office of Research and Development (OID) is internally responsible for supervising, following up and monitoring the complaint mechanism, through the social and environmental policy specialist. Likewise, for purposes of independence and transparency of the mechanism, the Compliance and Integrity Officer of the Compliance and Integrity Office (OCI) has permanent access to information on the resolution of the complaints filed. Follow-up and monitoring of the mechanism must be permanent and close coordination will be maintained with the DIME social specialist. If necessary and in order to provide feedback to the process, the OID will make adjustments to the flow of attention, in coordination with the OCI and the DIME, in order to provide better attention and speed in the resolution of the complaint.

## 10.1. Procedure for resolving complaints

In this section we present the procedure for handling complaints, which consists of three levels:

- **Operational level of care:** is the first level of care and are linked to actions that contemplate an intervention, and are received by the team in charge in the territory. The maximum period of attention is 10 working days.
- **Management level of care:** this is the second level of care and complaints are linked to the functions of the institution's line and support bodies. At this level, solutions may lead to an investigation by line and institutional support bodies. The maximum term of attention is 20 working days, counted from the end of the operative level of attention.
- **Executive level of attention:** is the third level of attention and the complaints that reach this level go through an investigation by the control bodies in order to adopt institutional corrective measures. And the term of attention is 15 working days from the end of the management level of attention.

The details of each level are described below:

- **Operational level of care (Level 1):**

The complaint attention at this level should be addressed by the intervention management unit within a maximum period of 10 working days. The procedure

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<sup>5</sup> In cases where interventions have a complaint mechanism in place prior to the issuance of this mechanism, the communication strategy should be implemented considering this mechanism.



described below varies according to the personnel designation in each intervention. However, the functional responsibility for final reporting of complaint resolution rests with the coordinator or intervention manager.

Procedure:

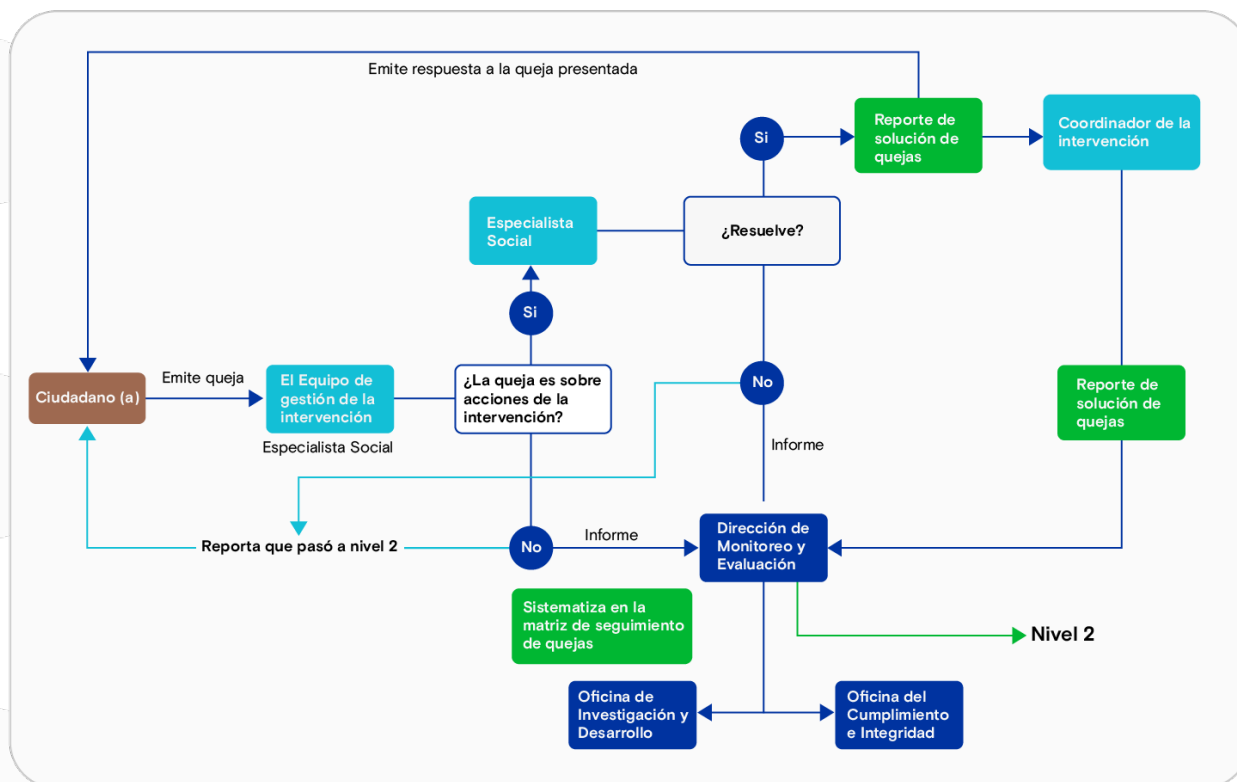
- The social specialist of the intervention, or whoever assumes a similar role, receives and records the complaint in *Form N°1*. He/she then evaluates whether it is related to the intervention's actions.

If positive, the specialist resolves and issues a report to the intervention coordinator on the actions and measures taken, attaching *Form N°2*.

- The intervention coordinator or whoever he/she assigns makes the contents of the report form his/her own, ensures that the citizen is informed of the measures taken, and issues the form to the DIME, who records the occurrence in *Form N°3*.
- DIME informs the OID and the OCI of the results of the process by e-mail.
- If negative, i.e., the complaint does not refer to actions of the intervention; through a report prepared by the coordinator of the intervention and sent to the complaints mail ([quejas@profonanpe.org.pe](mailto:quejas@profonanpe.org.pe)) the DIME, through the social specialist, is requested to continue with the respective procedure at the second level of care.
- Likewise, if even though the complaint is referred to the intervention, and cannot be technically resolved by the management unit, the coordinator requests technical support to the DIME at the next level of attention, through a report that must be sent to the complaints mail, and is reported to the citizen.

The procedure is represented graphically as follows:

**CHART N° 1:  
OPERATIONAL LEVEL OF CARE (LEVEL 1)**



In case the complaint is about the technical staff of the intervention, the intervention coordinator will request that the DIME resolve it through the social specialist at the second level of care, sending the details to the complaints mail. This will allow the resolution of the complaint to be impartial and transparent. Likewise, the coordinator or the person assigned will inform the citizen of the action taken.

▪ **Management level of care (Level 2):**

This level of attention considers those complaints that could not be resolved at the first level and are referred to this second level of attention. Likewise, those that are entered in the physical mailbox located at the Profonanpe Office, as well as those coming from the Virtual mailbox of the institutional web page (<https://profonanpe.org.pe/en/quejas/>) or e-mail (quejas@profonanpe.org.pe).

At this level of attention, the complaint must be addressed within a maximum period of 20 working days, counted from the registration of receipt by DIME, because it could open a more detailed investigation.

Procedure:

- The DIME social specialist receives the complaint from the first level of care, the physical mailbox, the virtual mailbox of the institutional website or e-mail, as

appropriate. Once the complaint is received, an e-mail is sent to the OID and OCI for their knowledge.

- The DIME social specialist then performs two evaluations:

a) *If it corresponds to an intervention with operating mechanism.*

If applicable, the coordinator is notified by e-mail, with a copy to the specialist responsible for handling complaints about the intervention, to the OID and OCI. The citizen will also be informed of this referral.

When the complaint is submitted to Profonanpe, a record is generated in the follow-up matrix, so in the "Observations" field, information on the mechanism to which the complaint was referred will be entered. This contributes to the follow-up of complaints in which Profonanpe is involved, and to the fulfillment of its role of contributing to the improvement of service to the citizen or beneficiary.

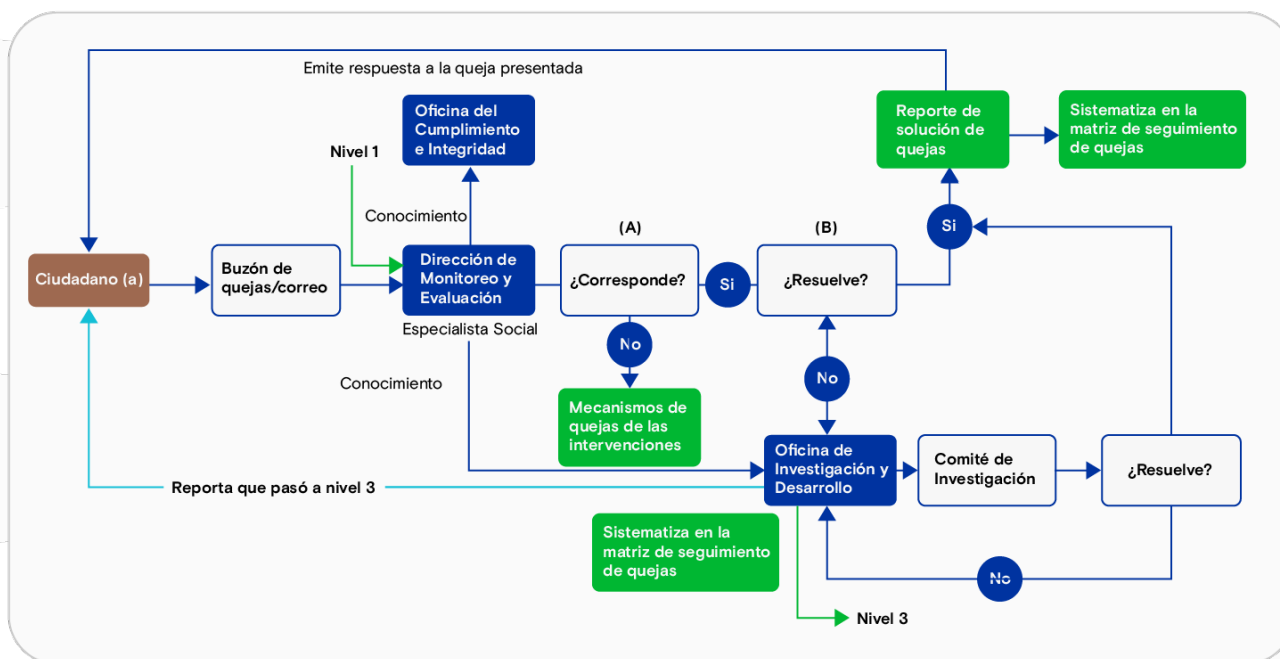
b) *If it corresponds to a social, environmental, administrative or other issue.*

The social specialist assumes the resolution of the complaint within the framework of his/her competencies. If it is environmental, the complaint is referred to the environmental specialist for resolution or coordination with the pertinent instance. If it is administrative, the complaint is resolved by the Financial Administration Manager (GAF). If it is an integrity issue, it corresponds to the OCI and will go to the next level of attention.

- The specialist coordinates with the corresponding authorities for the completion of *Form N°2* and informs the citizen of the following.
- It is then recorded in *Form N°3* by the DIME social specialist, who informs the OID and the OCI by e-mail.
- If unresolved, the social specialist requests action by the OID. The OID forms an investigation committee depending on the subject of the complaint.
- If the complaint can be resolved with the results of the investigation, the OID prepares the complaint resolution report and informs the DIME for registration in *Form N°3*.
- If the results of the investigation do not resolve the complaint, the citizen is informed that the complaint moves to the next level of attention (Level 3).

The procedure is represented graphically as follows:

**CHART N° 2:**  
**MANAGEMENT LEVEL OF CARE (LEVEL 2)**



▪ **Executive level of attention (Nivel 3):**

It is expected that this level of attention will be the least recurrent, given that the mechanism seeks to provide an agile solution to any complaints that may arise.

This level of attention considers those complaints that could not be resolved at the second level of attention. Complaints related to integrity are resolved at this level of attention given the functions of the Internal Control Organ (OCI).

Procedure:

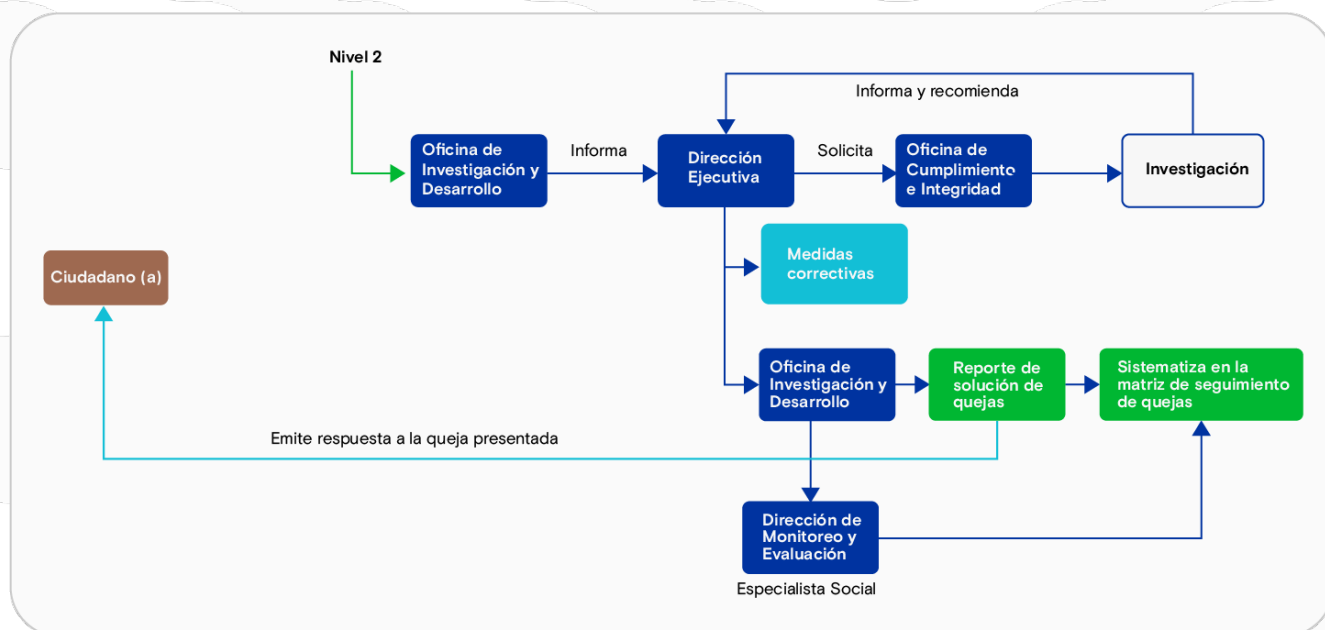
- The head of the OID informs the Executive Directorate (ED) about the complaint and, if applicable, about the results of the investigation carried out by the committee formed at the second level of care.
- The ED requests the Compliance and Integrity Officer to take action to resolve the complaint.
- The OCI conducts the relevant investigation (at this level, the investigation is linked to internal control, administration and finance, or human rights issues mainly) to respond to the complaints filed. In case the complaint is not resolved, such investigation shall provide the necessary grounds indicating the reasons for the non-resolution.



- The results of the investigation are reported to the ED and it recommends pertinent actions and corrective measures. Likewise, the OCI informs Profonanpe's Executive Committee of the actions taken in the process of resolving the complaint.
- The ED requests the head of the OID to prepare *Form N°2* based on the results of the OIC investigation, and to inform the citizen.
- The OID then sends *Form N°2* to the DIME to record the occurrence on *Form N°3*.

The procedure is represented graphically as follows:

**CHART N° 3:**  
**EXECUTIVE LEVEL OF CARE (LEVEL 3)**



It should be noted that in the case of a complaint against the Executive Directorate, the results of the investigation carried out by the OCI will be communicated to Profonanpe's Executive Committee so that the appropriate actions can be taken.

▪ **Procedure by Exception**

This procedure, considered by exception, is developed when the ED receives a complaint directly. In this case, the ED requests the DIME to deal with the complaint according to the levels of attention described in the previous sections, as appropriate.

## XI. Follow-up and monitoring

Follow-up and monitoring of the resolution of complaints allows us to provide feedback on internal institutional processes and generate strategies to mitigate the causes of complaints.

As described above, the OID is responsible within the institution for the follow-up and monitoring of the complaint mechanism, as a support and advisory body within the organizational structure. While the OCI monitors the mechanism from an external point of view, in order to guarantee its independence.

DIME, as the line agency, is in charge of the operational management of Profonanpe's complaint mechanism. One of its functions is to integrate the reports on the status of complaints, for which reason it must keep *Form N°3* updated. In this regard, close coordination between the OID social and environmental policy specialist and the DIME social specialist is key to the complaint monitoring process.

The monitoring matrix is a key tool for adopting measures to provide feedback on internal institutional processes and on the interventions in which Profonanpe participates. The matrix gathers relevant information on the actors involved in the complaint resolution process, allows to visualize the relevant information of the complaint, the measures adopted for its resolution, and the status of each one of them. For operational purposes, DIME is responsible for filling out *Form N°3*, while ODI and OCI can only view it for monitoring purposes.

In this phase, it is also important to communicate in a timely and culturally relevant manner to the population, community, citizen who filed the complaint.

## XII. Implementation Strategy

### Guidelines for the systematization of complaints:

Within the framework of the implementation of this mechanism for registration, organization and monitoring purposes, the coordinator of the intervention that has a complaint mechanism in operation, or whoever he/she designates, must send the Complaint Follow-up Matrix (Form No. 3) to the DIME on a quarterly basis. And for one time only, after the approval of this mechanism, they must send within a period of no more than two (02) months the same Follow-up Matrix with the information of those complaints that have been presented in the last three (03) years within the framework of their interventions, as the case may be.

The strategy for implementing the complaint mechanism seeks to achieve the principles of legitimacy and participation as a priority. Likewise, it will seek to reduce gender gaps, cultural diversity and the differentiated situation of young people. In this

sense, the implementation of the mechanism employs various strategies to promote relevant information so that citizens can access the mechanism. One of the strategies envisaged is the use of the *Complaints Registration Form* (Form N°1) on an itinerant basis, i.e., the technical teams should take this form with them to their activities, so that citizens can access it whenever they consider it necessary.

#### **Actions to be considered in the mechanism's implementation strategy**

- The development of an activity must be coordinated with due anticipation and respecting the organizational structures of the communities, associations, etc.
- The calls for proposals must guarantee the representativeness of women and young people from the public, private and civil society sectors.
- The development of assemblies, trainings, among others, must contemplate schedules and timetables that guarantee the participation of women, as well as generate strategies for the care and feeding of children during the programmed activities.
- Information should be collected and differentiated by gender, language, ethnicity and age group.
- Consider local translators, where one or more languages other than Spanish are identified.
- The development of communication materials incorporates elements according to the culture and language of the target audience, as well as elements that address gender discrimination or sexual diversity.
- The use of inclusive language is promoted, avoiding generic masculine words in certain circumstances, as well as the use of sign language when required.

It should be noted that in a context marked by the COVID 19 pandemic, where inequalities have become more visible, it is relevant that the implementation strategy of the complaint mechanism contemplates actions that seek to reduce information gaps.

On the other hand, in order to achieve the success of the strategy for the implementation of the mechanisms, two (O2) priority actions must be implemented: training and dissemination, as follows.

### **12.1. Training:**

Capacity building for the proper implementation of the complaint mechanism is proposed on at least three levels and is aimed at groups of actors according to their relationship with the mechanism.

The training is aimed at intervention management units, implementing partners, civil servants, specialists, and technicians from Profonanpe's line and support bodies. However, the training methodologies, the number of hours taught and the training materials should be planned according to the target audience and the place where the training will be implemented. In this regard, the restriction measures adopted by the Peruvian State within the framework of COVID 19 will be taken into account, seeking alternatives that will allow the implementation of activities.

### **First level:**

The objective is to introduce participants to the general and basic aspects of the complaint process. Suggested topics at this level are those related to human rights, gender, interculturality, inequality gaps, key concepts for conflict management, participation and transparency, the national regulatory and binding management framework, the structure of Profonanpe's environmental and social management system, and the policies of the cooperation funds, as appropriate.

### **Second level:**

The objective is to strengthen the knowledge of institutional policies, and to make known their linkage to the attention of complaints. The topics to be developed are the framework on which Profonanpe's complaint handling mechanism is implemented. Institutional policies such as social and environmental policies, the environmental and social safeguards manual, the code of ethics, and guidelines to prevent conflicts of interest are discussed. An induction is made to the mechanism of attention to complaints presenting the principles, objectives, and scope of its implementation.

### **Third level:**

The objective is for participants to identify their role in the implementation of the complaint mechanism, as well as to understand the benefits and its importance in the institutional structure. At this level, the structure and operation of the mechanism, the flow of attention, roles and functions of the parties involved, as well as the development of case studies are disseminated. The respective forms for registration in both mechanisms are also presented.

## **12.2. Dissemination**

The dissemination process seeks to strategically position this mechanism and to keep stakeholders informed about its access, operation and benefits.



Dissemination of the mechanism will be carried out taking into account the institution's communications guidelines, as well as those of each of the interventions. And it must ensure that the process is inclusive at all levels of implementation, promoting the active participation of the actors involved in the institutional action.

Dissemination should be continuous and carried out in all areas where interventions are implemented. The objective of the dissemination is to bring the mechanism closer to the general public who perceive that their rights are not being violated with the implementation of an activity in charge of the institution.

Dissemination of the mechanism is developed according to levels of care:

- **At the operational level**, where the stakeholders involved are the operators of the interventions and direct beneficiaries. Dissemination of the mechanism may take place during assemblies, meetings and/or training sessions held as part of the implementation of the intervention.
- **At the institutional level**, whose stakeholders are Profonanpe's collaborators in general. Dissemination should take place during monthly or quarterly meetings of the work teams.

In both cases, dissemination can be done in person and/or virtually.

#### **Regarding dissemination materials:**

As previously mentioned, the dissemination and training processes must be culturally appropriate and accessible to any citizen, especially when the target audience is indigenous or native peoples, or people living in rural areas. In this regard, dissemination and training materials to promote care mechanisms should use inclusive images and graphics, with a gender perspective, and if necessary, be in different native languages.

# Annexes



## FORM N°1: Complaint registration form

Register	
N°:	
Date:	

Mark with "X" your answer and fill in the requested fields with clear and legible handwriting. Complaints made through this form are CONFIDENTIAL.

What is a complaint: A complaint refers to the dissatisfaction or non-conformity formulated by a person or entity associated with the action or inaction in the different interventions in which PROFONANPE participates.

DETAILS OF THE PERSON FILING THE COMPLAINT	
Name and Last Name (Optional): _____	
Identity Document (Optional): ( ) DNI: _____ ( ) Other: _____	
Sex: ( ) Male ( ) Female ( ) Don't want to say	Self-identification: ( ) Mestizo ( ) Indigenous ( ) White ( ) Afro-Peruvian ( ) Asian Descendant ( ) Other: _____
Contact information: (MANDATORY completion of at least one of them)	
Telephone N°: _____ Cell phone N°: _____ E-mail address: _____	
COMPLAINT INFORMATION	
Enter the name of the intervention (project/program) or area about which the complaint is being made _____	
If applicable, if the complaint refers to an individual, enter his or her data (Optional): Name and Last Name: _____ Position and/or area: _____	
Describe the specific facts giving rise to this complaint, very clearly (You may write on the back sheet if necessary):          	
Attach documents supporting the complaint to the following email <a href="mailto:quejas@profonanpe.org.pe">quejas@profonanpe.org.pe</a> , with the complaint registration number (Optional): ( ) Letters/Official letters ( ) Minutes/Reports ( ) Audio/video/photo ( ) Others (Specify): _____	
ADDITIONAL INFORMATION ON THE PERSON FILING THE COMPLAINT	
Language: ( ) Spanish ( ) Indigenous and native language Other (Specify): _____	
Place of residence, as applicable: Address (Optional): _____ (Optional) ( ) Native Community ( ) Peasant Community District: _____ Province: _____ Community Name/ Village Center Department: _____ (Optional): _____ Annex (Optional): _____	

### FIELDS TO BE FILLED BY PROFONANPE:

TYPOLOGY OF COMPLAINT:	
( ) Disclosure of Information	( ) Administrative ( ) Other: _____
( ) Social and Environmental Safeguards	( ) Integrity

\_\_\_\_\_  
 Signature of complainant

Name and Last Name: \_\_\_\_\_

Position/Area: \_\_\_\_\_

 \_\_\_\_\_  
 Signature of the person receiving the complaint

Name and Last Name: \_\_\_\_\_

Position/Area: \_\_\_\_\_

## FORM N°2: Complaint resolution form

Register	
N°:	
Date:	

This Form must be filled out by Profonanpe staff, depending on the level of attention, it can be the intervention team (Program/Project) or the team at the Lima headquarters.

DETAILS OF THE PERSON REGISTERING/RECEIVING THE COMPLAINT		
Name and Last Name: _____		
Position/Area: _____		
DETAIL THE MEASURES IMPLEMENTED		
Actions performed	Date	
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
DETAILS OF THE PERSON IMPLEMENTING THE FINAL COMPLAINT MEASURE		
Name and Last Name: _____		
Position: _____		
Describe and attach the means of verification: _____		
TYPOLOGY OF COMPLAINT		
<input type="checkbox"/> Disclosure of Information	<input type="checkbox"/> Administrative	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Social and Environmental Safeguards	<input type="checkbox"/> Integrity	

### FORM N°3: Complaint follow-up matrix

N°	REGISTRATION INFORMATION					DETAILS OF THE PERSON FILING THE COMPLAINT				COMPLAINT INFORMATION				ADDITIONAL INFORMATION ON THE PERSON FILING THE COMPLAINT			RESOLUTION OF THE COMPLAINT				REMARKS							
	Date	Detail if complaint/ inquiry/suggestion	Name of person who registered/received the complaint	Registration channel (in-person mailbox, virtual mailbox, telephone, Typology (Information Disclosure, Environmental and Social Safeguards, Administrative, Institutional, Other)		Full name	DNI	Sex	Self-identification (mestizo, indigenous, white, Afro-Peruvian, Asian descendant, other)	Contact information: Telephone, cell phone, e-mail, etc.	Name of Intervention (Program/Project)	If the complaint refers to a person, enter his/her full name.	If the complaint refers to an individual, enter his/her	Brief description of the case	Means of Verification	Language (Spanish, indigenous language or native language, other)	Place of residence: Address	Department/ province/ district/ community/ annex	Organization (if applicable)	Name of person responsible		Position	Measures implemented for resolution	Means of Verification	Implementation status (Start, in process, completed)	Closing date		