HOW TO COMPLAIN ABOUT A PROJECT FUNDED BY THE UNITED NATIONS DEVELOPMENT PROGRAMME?

A guide to the UNDP's Social and Environmental Compliance Unit (SECU) and Stakeholder Response Mechanism (SRM)

If the United Nations Development Programme (UNDP) supported the project that is causing you harm or was implemented in violation of its environmental and social standards, you may be able to file a complaint through one or both of UNDP's accountability offices: the Social and Environmental Compliance Unit (SECU) and the Stakeholder Response Mechanism (SRM).

Understanding UNDP, SECU and SRM

WHAT IS THE UNDP?

The United Nations Development Programme (UNDP) is the United Nations' lead agency on international development, established in 1965. UNDP is headquartered in New York City, but works primarily through its offices in around 170 countries and territories.

The UNDP's mission is to support countries and communities as they work to eradicate poverty, implement the Paris Agreement on climate change and achieve the Sustainable Development Goals (SDGs), through providing funding and technical assistance for projects in areas such as climate and environment, democratic governance, and sustainable development.

WHAT IS SECU AND SRM?

The UNDP has an accountability mechanism, as part of the Office of Accountability and Investigations (OAI), with two complementary functions, which were established in 2015:

- SECU: The Social and Environmental Compliance Unit which leads the compliance review function, and assesses whether the UNDP has complied with its Social and Environmental Standards (SES) in the design and implementation of its projects.
- SRM: The Stakeholder Response Mechanism which leads the dispute resolution function, and helps facilitate dialogue between affected people and UNDP's project teams to try to resolve concerns in a collaborative, problem-solving manner.

SECU and SRM receive complaints related to the environmental and social impacts of UNDP-supported projects. If you are affected by a UNDP-supported project, you can file a complaint with SECU and the SRM.

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- What happens after you file a complaint?
- Real stories of communities who have filed complaints
- Assessing SECU and SRM's performance
- Contact SECU and SRM

As a complainant, you will be asked - at the time of filing - to decide whether you want to pursue dispute resolution, compliance review, or both. You may choose to engage one or both mechanisms - SECU and SRM operate independently and can be used at the same time or separately, depending on your needs.

ONLY DISPUTE RESOLUTION

The Dispute Resolution process at the UNDP is conducted by the Stakeholder Response Mechanism (SRM), and is a voluntary dialogue process designed to help resolve concerns raised by people affected by UNDP-supported projects. The SRM does not conduct investigations or determine whether UNDP followed its rules. Instead, it helps the parties come together to discuss the issues and explore possible solutions.

Dispute resolution is a voluntary and flexible process, which can include informal exchanges, joint problemsolving, or facilitated dialogue, depending on the needs and agreement of the parties. It depends on the willingness of all parties to participate.

If an agreement is reached, the parties may choose to document it and agree on how it will be followed up. If the process fails, you may still be able to submit a separate complaint to SECU, provided it meets SECU's eligibility criteria.

You can learn more about this phase below.

Q COMPLIANCE REVIEW

The Compliance Review process at the UNDP is conducted by the Social and Environmental Compliance Unit (SECU), and focuses on assessing whether the UNDP has violated its own Social and Environmental Standards (SES) in the design or implementation of a project.

During this phase, SECU examines whether UNDP's actions (or failures to act) have caused, or may cause, harm, and whether that harm is linked to a breach of UNDP policy. The process involves reviewing project documents, interviewing stakeholders, and may include a site visit.

If SECU finds evidence of noncompliance, it issues a Compliance Review Report with findings and recommendations. These are shared with UNDP management and the complainants (unless confidentiality is requested). UNDP is expected to take corrective action in response, and SECU may monitor follow-up steps.

You can learn more about this phase below.

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CAN YOU COMPLAIN TO SECU AND SRM?

Before filing a complaint, ask yourself the following questions. If your answer is **yes** to all of the questions, then your complaint should meet the criteria of SECU, SRM or both.

Project: Is the project or programme supported by UNDP?

You can file a complaint if the issue relates to a project or programme that is:

- Funded, implemented, or otherwise supported by UNDP, and
- · Linked to actual or potential social or environmental impacts.

The connection to UNDP does not need to be direct. UNDP may be working through partners (such as governments or NGOs), but if it has oversight, management, or support responsibilities, the project can still be eligible.

Tip: If you are unsure whether UNDP is involved, you can describe what you know about the project and its funders. The accountability offices can help clarify whether the complaint falls within their mandate.

Impact: Are you affected (or could you be)?

UNDP's mechanism accepts complaints from:

- Individuals, groups or communities who are experiencing, or at risk of, environmental or social harm from a UNDP-supported activity.
- Authorized representatives (such as NGOs, lawyers, or community leaders) with written permission to act on behalf of those affected.

You do not need to be a national of the country where the project is taking place, but you must have a clear connection to the harm, or potential harm, described in the complaint.

Important: Complaints cannot be submitted anonymously, but you can request confidentiality regarding your identity or sensitive information. If you fear retaliation, clearly explain those risks in your complaint so protective measures can be considered.

Harm: Is the harm related to environmental or social impacts?

Your complaint must describe an actual or potential environmental or social impact caused by the project.

For SECU, your complaint must describe how UNDP's actions (or failures to act) may have caused harm by violating its Social and Environmental Standards (SES) or related policies. A clear, plausible link between UNDP's conduct and the harm is needed. You do not need to cite specific policies, but your explanation should make clear how UNDP's actions (or failures to act) may have violated its responsibilities.

For SRM, you only need to describe your concern and how you'd like it addressed.

Attempted resolution: Have you tried addressing the issue?

For SRM, your complaint is only eligible if you have already made a good faith effort to raise your concerns with project staff or implementing partners first, unless you fear retaliation or face other barriers such as safety, language or access barriers. Explain any past efforts or barriers faced, to support a dispute resolution process (by SRM).

SECU, on the other hand, does not require you to have raised your concerns with the project team before filing. However, explaining any past efforts (or barriers you faced in trying) can help demonstrate your good faith attempts at raising issues and may support an investigation (by SECU).

If you fear retaliation or are unable to engage with project staff due to safety, language or access barriers, clearly explain those challenges in your complaint. Evidence of prior outreach, such as emails, meeting notes, or grievance forms, is helpful, but not required.

■ MODEL COMPLAINT LETTER

We have developed a model complaint letter tailored for the UNDP SECU and SRM. This template provides a practical starting point for your complaint, designed to help you effectively convey your concerns. Once submitted, SECU and/or SRM staff will review your complaint and may contact you for clarification or additional information.

▲ Download complaint letter

COMPLAINT FILING CHECKLIST

▲ Download checklist

- ☐ **Format:** Complaints can be submitted in writing via email or the online form available on the UNDP SECU and SRM website. Complaints may be submitted in any language. If not in English, translation support will be arranged.
- Complainant details: Your complaint should include the name of each person or organization filing the complaint, contact details for key community representatives. If you have a representative, include signed written authorization providing authority for the representative to represent you.
- □ Project details: Provide the name and location of the UNDP-supported project, along with any additional details (e.g. sector, company name, or project name). You can find information about projects on the UNDP Project Page or through the DeBIT tool or Early Warning System (databases you can search).
- □ Description of harm: Explain the harm you are experiencing or anticipate, supported by facts and evidence. Describe how this is connected to the UNDP-supported project. For SECU: your complaint must describe harm that may result from UNDP not following its own Social and Environmental Standards (SES) or other relevant policies. You do not need to cite the policies by name, but your description should explain how UNDP's actions (or failures) may have violated its responsibilities. For SRM: you do not need to reference a policy just clearly describe your concern and what outcomes you are seeking.

0	Choice of function: Indicate whether you are submitting your complaint to SECU, SRM or both. If both, the mechanisms will coordinate their activities but operate independently.						
0	Confidentiality: Indicate if you require confidentiality due to fear of reprisals or for other reasons. Clearly describe the risks you face and provide reasons for your request.						
0	Good faith: For SRM, add information about past efforts to raise your concerns with project staff, local grievance mechanisms, or UNDP personnel. This is not required for SECU, but can support your case.						
	Optional:						
	Including the following can strengthen your complaint:						
	 Your preferred outcomes or remedy, such as specific changes to the project or steps UNDP could take to address the harm. 						
	 Additional supporting material: maps, photos, media reports, copies of communications with UNDP or project implementers (even if they are unanswered), etc. 						
	 Information about past efforts to raise your concerns with project staff, local grievance mechanisms, or UNDP personnel. This is not required but can support your case. 						
	Your preferred communication method (e.g. email or post).						
	Any concerns about risks of retaliation or security issues.						
STRENGTHEN YOUR COMPLAINT BY REFERENCING UNDP POLICIES							
When filing your complaint to SECU, you may strengthen your complaint by referencing specific UNDP policies or standards that you believe were not followed. UNDP's Social and Environmental Standards (SES) and related policies are designed to prevent and manage risks linked to UNDP-supported activities, including protecting human rights, the environment and vulnerable communities.							
	investigates whether UNDP has failed to comply with its own policies, and whether on-compliance has caused - or may cause - environmental or social harm.						
0	Including references to these policies is optional but can strengthen your complaint by identifying how UNDP's failure to follow its own rules may have contributed to the harm you are experiencing or fear.						

UNDP POLICIES

Social and Environmental Standards

Effective January 1, 2021

The UNDP requires all its projects to comply with the following requirements. These standards apply to all UNDP-supported activities, regardless of how the project is financed or who implements it.

Standard 1: Environmental Sustainability

This standard ensures that UNDP-supported projects are environmentally sound. It requires projects to identify environmental risks and impacts early, apply the mitigation hierarchy (avoid, minimize, mitigate, and offset harm), and develop Environmental and Social Management Plans (ESMPs) to track and manage those risks. Projects must consult affected people in a meaningful way, monitor their environmental performance over time, and adapt if risks change. The standard also covers pollution control, resource efficiency, and efforts to reduce long-term environmental degradation.

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Standard 2: Climate Change and Disaster Risks

This standard requires that projects assess climate risks and disaster vulnerabilities from the start, and take steps to avoid worsening them. Projects must support climate adaptation and low-emissions development, integrate disaster risk reduction, and ensure that any activities are compatible with international climate goals, including the Paris Agreement. Activities that increase emissions or community vulnerability must be avoided.

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Standard 3: Community Health, Safety and Security

Projects must protect the health and safety of affected people, particularly vulnerable groups such as women and children. This includes minimizing exposure to pollution, hazardous materials, disease, or unsafe infrastructure. Where projects involve construction or pose risks to nearby communities, they must include emergency plans and safety measures. If security forces are involved, the project must manage the risk of violence or abuse and respect local norms.

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Standard 4: Cultural Heritage

UNDP-supported projects must safeguard cultural heritage—both physical (such as sacred sites or artifacts) and intangible (such as practices, languages, and traditions). Projects must assess any potential risks to heritage and work to avoid or minimize harm. Affected communities must be consulted and involved in decisions. Where Indigenous Peoples' heritage is involved, Free, Prior and Informed Consent (FPIC) must be obtained before proceeding.

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Standard 5: Displacement and Resettlement

UNDP aims to avoid forced resettlement. When displacement cannot be avoided, projects must provide compensation at full replacement cost, restore or improve people's livelihoods, and offer secure housing. Particular care must be taken to protect the rights of vulnerable people, such as women, Indigenous Peoples, and the landless. Projects must consult affected people throughout the process, obtain FPIC where required, and provide accessible grievance mechanisms and monitoring.

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Standard 6: Indigenous Peoples

This standard affirms the rights of Indigenous Peoples and requires that their identities, cultures, and institutions be respected and protected. Projects must identify Indigenous Peoples early, consult them meaningfully, and obtain FPIC before moving forward with any activity that affects their land, resources, culture, or livelihoods. Projects should ensure Indigenous communities benefit from development, rather than being harmed or excluded.

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Standard 7: Labour and Working Conditions

UNDP-supported activities must promote fair and safe working conditions. This includes prohibiting child labor and forced labor, providing decent wages and non-discriminatory employment, and protecting the health and safety of workers. Projects must respect workers' rights to organize and access grievance mechanisms without retaliation or discrimination.

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Standard 8: Gender Equality and Women's Empowerment

Projects must actively promote gender equality and women's rights. This includes conducting a gender analysis, involving women in project design and decision-making, and ensuring that benefits are equitably shared. Projects must not reinforce harmful gender stereotypes or inequalities. Where there is a risk of gender-based violence, projects must have prevention and response measures in place.

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Standard 9: Biodiversity Conservation and Sustainable Natural Resource Management

This standard protects ecosystems and the people who depend on them. Projects must avoid the degradation of natural or critical habitats and promote the sustainable use of biodiversity and natural resources. They must respect ecosystem services, apply the precautionary principle, and take steps to protect endangered species and sensitive ecological areas.

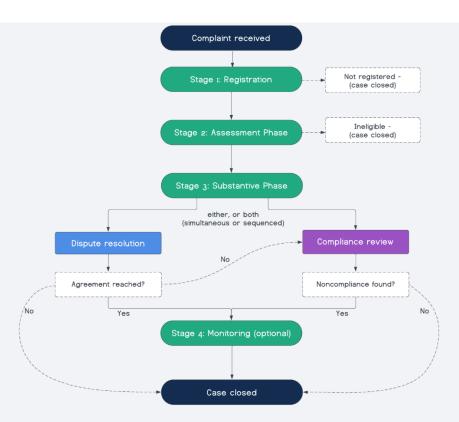
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UNDP Social and Environmental Screening Procedure

Updated July 2022

This procedure guides the project screening process, including how UNDP decides which Social and Environmental Standards will be applied. We recommend including this procedure if the UNDP has failed to refer to or consider a specific Standard that you think is relevant to the project.

X What happens after you file a complaint?



Stage 1: Registration

After filing your complaint, it is first reviewed for completeness by the SECU or SRM team, depending on which function you have selected (or both, if applicable). There is no centralized intake office; instead, complaints are submitted directly to SECU (for compliance review) and/or SRM (for dispute resolution).

To be registered, your complaint must clearly state who you are (or who you represent), describe the project involved, explain the harm, and indicate whether you are requesting dispute resolution, compliance review, or both.

Each function will confirm receipt of the complaint and may request clarification or additional information. Registration simply means the complaint has been received and logged, it does not mean it has been deemed eligible.

If you did not clearly indicate which function you are requesting (SECU, SRM, or both), the offices may follow up to confirm your preference. SECU and SRM are functionally separate but both are part of UNDP's Office of Audit and Investigations (OAI), and may coordinate administratively when both functions are requested.

Stage 2: Assessment Phase

After registration, your complaint enters the eligibility screening stage. Each function conducts its own assessment.

SECU: Will determine whether the complaint meets its criteria by verifying that:

- 1. The complaint involves a UNDP-supported project or programme.
- 2. The harm described is environmental or social in nature.
- The harm appears linked to non-compliance with UNDP's social and environmental commitments.

If a complaint meets these conditions, SECU proceeds to a full compliance review. If it does not, SECU will notify the complainant with a written explanation.

SRM: Will determine whether the complaint meets its criteria by verifying that:

- 1. The complaint involves a current or proposed UNDP project.
- Explain how you have been experiencing or may experience harmful socio-economic or environmental impacts from the UNDP project.
- 3. Indicate what steps you have already taken to resolve the complaint, such as communicating with the client, the project manager, the project board, or a grievance mechanism. A complaint may be found ineligible if no prior good faith effort has been made.

In developing response options, the SRM consults directly with the country office, and the country office may then have the "default" responsibility for leading the UNDP response.

While determining eligibility, SECU and SRM will consult with each other. If both processes are applicable, the complainant will be informed and provided the choice to proceed with either or both. If the complaint is found to be ineligible for one process, it may still be eligible for the other and may be referred to that function.

Stage 3: Substantive Phase

Once your complaint moves forward, it enters the substantive phase: which involves either **dispute resolution** or **compliance review**, depending on your chosen function. In some cases, both functions may happen simultaneously or sequentially.

ONLY DISPUTE RESOLUTION

Dispute resolution is a voluntary process where the SRM helps facilitate a "problem-solving" process between you (the complainant) and the project promoter (the organization implementing the project).

This process can involve dialogue, mediation, joint fact-finding or other collaborative steps. This process can and should be designed and implemented together. The aim of a dispute resolution is to reach an agreement between all the parties, and find a mutually agreeable solution to your concerns.

Q COMPLIANCE REVIEW

Compliance review is a fact-finding process where SECU investigates whether the UNDP followed its own environmental and social policies.

After deciding on eligibility, SECU will develop and publicly release a draft investigation plan. Interested stakeholders and the public will be able to comment on this plan. Once approved, SECU will begin the compliance process. This involves reviewing project records, conducting interviews with relevant stakeholders and possibly conducting site visits. SECU does not assess the conduct of

Voluntary: Since dispute resolution is voluntary, any party can choose not to participate and participation requires consent from all involved. If parties agree to participate, communities can share their concerns about the project directly with UNDP's client, and advocate for specific solutions to their concerns.

Outcome: If the parties reach an agreement, the SRM may help them in documenting the outcomes and determining how progress will be monitored. If no agreement is reached or the process is terminated early, the complainant may choose to pursue compliance review with SECU (if they have not already done so), provided eligibility criteria are met.

For more details on the dispute resolution process, refer to the UNDP Stakeholder Response Mechanism Guidance.

third parties - its role is to assess UNDP's own compliance with its responsibilities. In urgent cases, SECU may recommend temporary measures, such as suspending financial disbursements, to prevent imminent, irreversible harm.

After investigating, SECU prepares a draft compliance review report with findings and any recommendations and monitoring plans. These are shared with the director of the OAI. After this review, the report and note will be released to the complainant, UNDP staff, and the public for comment (unless confidentiality has been requested). SECU will put together and review comments received during the public comment period, publish comments that aren't confidential or sensitive, and respond to these comments alongside the final report.

SECU will then release a final compliance review investigation report, which will be released to UNDP management, the complainant and the public.

Note: In some cases, SECU may initiate investigations on its own, even without a complaint, particularly for high-risk projects where affected communities may face barriers to filing.

For more details on the compliance review process, refer to the UNDP Social and Environmental Compliance Unit Investigation Guidelines.

Stage 4: Monitoring

If your complaint goes through a dispute resolution process and results in an agreement, or identifies non-compliance during a compliance review, then the complaint may enter a monitoring phase.

DISPUTE RESOLUTION

If the SRM process leads to an agreement, the parties may jointly agree on how implementation will be monitored. The SRM team may support follow-up discussions and track progress, but there is no fixed

Q COMPLIANCE REVIEW

If SECU finds that UNDP was not in compliance with its policies, the UNDP administrator will make a decision as to what steps UNDP will take to bring the project or programme into compliance.

monitoring timeframe built into the process. The SRM will issue a monitoring report at least annually until the agreement has been fully implemented. All monitoring plans and reports will be available to the complainants and the public on the SRM website.

SECU will keep the case open and monitor the remedial measures taken by UNDP. While SECU does not have enforcement powers, it will follow up on the implementation of its recommendations and track whether UNDP has taken the necessary steps to address the harm or policy failures identified.

This monitoring may involve progress reports, onsite inspections and correspondence with the community. Monitoring plans will be described in the final report.

SECU closes a case once it considers its review and any necessary followup to be complete.

Real stories from communities who have filed complaints Ridge to Reef Conservation Project, Myanmar Q COMPLIANCE REVIEW

COMPARISON TO BEST PRACTICE

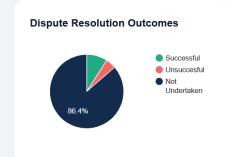
- Independence: SECU's reporting line is not independent from bank management; it reports to the Director of the Office of Audit and Investigations, which then reports to the UNDP Administrator.
- Independence: SRM's reporting line is also not independent from bank management; its roles and responsibilities are dispersed among country offices, regional bureaux and hubs, and the Bureau of Policy and Programme Support
- Transparency: SECU makes complaints, eligibility reports, final compliance reports, and follow-up monitoring reports public.
- Transparency: SRM makes follow-up monitoring reports public, and may publish summaries and outcomes of dispute resolution processes but only with the parties' consent.
- Remedy: SECU can make recommendations for corrective actions to address areas of noncompliance, but it does not explicitly have a mandate to recommend remedy for affected communities.
- Transparency: SRM policies do not clearly state whether complaints, eligibility reports, or dispute resolution reports will be made public.

A LOOK AT THE DATA

We have brought together some charts, based on the latest data available in the Complaint Dashboard, to offer a deep dive into the UNDP, SECU and SRM's performance.













RECOMMENDATIONS TO IMPROVE SECU AND SRM

- SECU should have a direct reporting line to the UNDP Administrator.

 Currently, it is required to seek approval from the UNDP Office of Audit and Investigations (OAI) on procedural and investigative matters that should be left strictly to SECU's discretion. This compromises the perception of SECU's independence, as well as its ability to meet procedural deadlines and promptly relay urgent matters to the UNDP Administrator. (GPP 5)
- SECU and SRM should more effectively interact to facilitate remedy. The SRM should be better resourced and more independent so that it is an effective avenue for communities to resolve their concerns. (GPP 38)
- SECU should have a stronger advisory function. It should have the ability to provide advice directly to the UNDP Administrator on ways for UNDP to improve its environmental and social due diligence and performance. (GPP 71)