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**Bhutan Trust Fund**  
for Environmental Conservation

**Program Operation Norms 2019**

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## 1. INTRODUCTION

### 1.1. Bhutan Trust Fund for Environmental Conservation

Bhutan Trust Fund for Environmental Conservation (BTFEC) is the world's first environmental trust fund, established in 1992 as a collaborative venture between the Royal Government of Bhutan, United Nations Development Program, and World Wildlife Fund. Endowed with US\$20 million contributed by the Royal Government of Bhutan and multiple international donors, the BTFEC's is charged with an overriding goal to finance conservation programs over the long term in Bhutan.

The trust fund received an important boost in May 1996, when it was legally incorporated in Bhutan under the Royal Charter.

Governed by a high-level management board and supported by an efficient secretariat, BTFEC has evolved into an effective grantmaking organization, autonomous of the government.

### 1.2. Program Operation Norms (PONs)

The purpose of the PONS is to establish a succinct framework of norms for smooth functioning of BTFEC to effectively achieve BTFEC's mission, which is "to promote the socio-economic welfare of Bhutanese citizens by funding conservation of their flora, fauna, diverse eco-system and biodiversity; and addressing the adverse effects of development on Bhutan's natural environment"

The PONs has been derived from existing policies and frameworks of BTFEC including the Royal Charter, Operational Manual, etc., and international best practices.

The PONs was approved by the BTFEC at the 53<sup>rd</sup> Meeting of the Management Board on the 07<sup>th</sup> day of the December month of year 2019.

## 2. ADVOCACY POLICY

### 2.1. Background

Bhutan Trust Fund for Environmental Conservation (BTFEC) must seek high visibility primarily for the following purposes:

- i. To inform Bhutanese people of the existence of BTFEC and the grant opportunity it provides for environmental conservation initiatives.
- ii. To show case the achievement of the conservation programs funded by BTFEC
- iii. To garner donor support in order to enhance its endowment fund.

Recognizing the importance of such funding window, the Management Board during its 10<sup>th</sup> Management Board Meeting held on 11 October 2000, endorsed the Advocacy Fund for BTFEC. The Management Board approved 10% of BTFEC's annual Secretariat budget as the Advocacy Fund.

BTFEC Secretariat administers the Advocacy Fund and the proponent will apply for fund using the prescribed template (Annexure I).

### 2.2. Objective and Scope

The objective of the advocacy program is to promote visibility of BTFEC through creation of public awareness on BTFEC's funding opportunities and showcase its project impacts on environmental conservation and social well-being for fostering partnerships.

The scope of advocacy includes but not limited to media institution, public event organizer, individual, institution, community and grantees.

### 2.3. Strategy

BTFEC shall:

- i. Support advertisements and felicitations along with environmental messages at national and appropriate events;
- ii. Produce publications, reports, audio-visual materials and website content and other relevant communication materials;

- iii. Provide sponsorship of environmental education and community-based events, sports and games;
- iv. Use all forms of media and other avenues to promote BTFEC's visibility;
- v. Produce and distribute souvenirs that promotes BTFEC's visibility;
- vi. Clear all advocacy and communication materials and provide oversight over utilization of the advocacy funds;
- vii. Grantee shall ensure that BTFEC's visibility is promoted through projects;
- viii. Advocate project outcome(s), specifically innovations and new technological interventions promoted through projects;
- ix. BTFEC reserves the right to accept or decline advocacy request.

### 3. CONFLICT OF INTEREST POLICY

#### 3.1. Background

The Conflict of Interest (COI) declaration is one of the tools in managing corruption. Non-declaration of COI may lead to favoritism and even corrupt activities that are in breach of certain laws. Such practice may even lead to loss of public confidence and reputation to individual or agency.

BTFEC as the custodian and manager of public resources, its Governing body members, TAP, AMC, BTFEC management and Secretariat are mandated to institute corruption free decision and grant making systems, that is transparent and accountable. Therefore, any member of the Governing body, TAP, AMC, BTFEC management and Secretariat have the obligation to declare COI whenever necessary when carrying out their duties. The interest of the BTFEC must be above their personal interest, and above the interest of whatever organizations appointed or employs them.

Conflicts of Interest (COI) can be Actual, Perceived or Potential:

- i. An *actual conflict of interest* involves a direct conflict between a public official's current duties and responsibilities and existing private interests.
- ii. A *perceived or apparent conflict of interest* can exist where it could be perceived, or appears, that a public official's private interests could improperly influence the performance of their duties – whether or not this is in fact the case.
- iii. A *potential conflict of interest* arises where a public official has private interests that could conflict with their official duties in the future.

#### 3.2. Objective and Scope

The purpose of the conflict of interest policy is to ensure transparency, fairness, and high standards of ethical conduct culminating to objective decision making.

This policy is applicable to Governing body, committees, BTFEC Secretariat, partners, volunteers and interns.

### 3.3. Strategy

Governing body, committees, BTFEC secretariat shall:

- i. Uphold and manage COI with highest degree of integrity to safeguard BTFEC's interest and effectiveness;
- ii. Declare actual, perceived or potential conflict of interest whenever it demands as per the BTFEC's declaration of COI form (Annexure II);
- iii. Not participate in decision-making on any matter respecting which he/she has actual, perceived or potential conflict of interest;
- iv. Declare the nature and extent of any potential benefit to him/her or his/her family members;
- v. Only use property of the BTFEC for directly carrying out its duties and shall not use for purposes not directly related to the management of the BTFEC;
- vi. Record the incidence of violation of the policy and in the event of non-disclosure of actual or perceived COI, or the National Competent Authority (NCA)<sup>1</sup> has a reasonable cause to believe that an individual has failed to disclose and actual or perceived COI, it will inform the individual of the basis for such believe and provide him/her with the opportunity to explain the alleged failure to disclose. After hearing the response and making further investigation as may be warranted, the NCA determines that interested person has in fact failed to disclose and actual or perceived COI it shall notify to the appropriate authority.

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<sup>1</sup> National Competent Authority (NCA) is referred to Anti-Corruption Commission of Bhutan (ACC), Royal Bhutan Police (RBP), Royal Audit Authority

## 4. DISPUTE RESOLUTION AND MANAGEMENT POLICY (DRMP)

### 4.1. Background

The BTFEC promotes a healthy working environment through prevention, resolution, and processing of workplace disputes, grievance redresses including complaints of judgement. The DRMP's primary objectives are to provide the management, of employees and project grantees, an effective mechanism to successfully resolve workplace and grant contract disputes in an amicable, timely and proficient manner; while avoiding escalations and in turn, support a respectful, healthy and productive work environment.

Grievances/disputes in the workplace may arise for various reasons including, but not limited to; bullying, harassment or discrimination, grievances between a staff member/volunteer and their Manager/Supervisor or between staff members/volunteers; or issues related to internal BTFEC processes e.g. Performance & Career Development.

Grantee grievances may arise from a variety of sources from not getting funds released on time, to unfair evaluations. Often times such grievances are hard to resolve as grantees may not come forward to BTFEC for the fear of future retributions.

### 4.2. Objective and Scope

Dispute resolution and management norms are designed to ensure effective functioning and management of BTFEC and create a healthy working environment to promote individual and organizational growth.

This policy is applicable to Governing body, committees, BTFEC Secretariat, relevant stakeholders, grantees, volunteers and interns.

### 4.3. Strategy

- i. When possible, all disputes shall be resolved informally and internally.
- ii. A dispute that cannot be resolved will be elevated to the Management Team and further to the Management Board if the Management Team cannot resolve.
- iii. BTFEC's approach to grievance/dispute resolution is to:
  - a. Minimize the frequency of disputes;

- b. Provide clear procedures that allow every party involved in a grievance or dispute the opportunity to present their case; and,
  - c. Achieve a resolution that considers the points of view of every party.
  - d. Administer and comply with the prevailing Operation Manual, Agreements and policies.
- iv. Institute a grantee grievance redressal mechanism to address any complaints from grantees who are negatively affected by BTFEC grants.
- a. Designate an independent person (e.g. the auditor) as the focal person for receiving complaints from grantee (see annexure II for details);
  - b. Open channels for receiving complaints anonymously including dedicated telephone number, email, website;
  - c. The complaints can be written, video, or photos;
  - d. The focal person must register such cases into a database and resolve them at the soonest.

During the resolution of a grievance or dispute work is to continue as normal unless there is an imminent risk to the health and safety of any persons.

The resolutions of employee/grantee grievances/disputes managed through this policy are to be treated with strict confidentiality and are to be addressed promptly and fairly.

## 5. ORGANIZATIONAL INTEGRITY PLAN POLICY

### 5.1. Background

The Organizational Integrity Plan (OIP) is to ensure transparency, accountability and integrity of Bhutan Trust Fund for Environmental Conservation.

### 5.2. Objective and Scope

The purpose of the organizational integrity plan is to ensure and promote ethical competence of Governing body and committees, BTFEC Secretariat to reduce corruption opportunities through strengthened governance system.

This plan applies to all members of the Governing body, committees, and BTFEC Secretariat.

### 5.3. Strategy

Activity	Responsibility	Timeframe			Means of Verification	Remarks
		FY 20-21	FY 21-22	FY 22-23		
<b>AKRA 1: Transparent, accountable and integrity culture strengthened</b>						
1.1	Enforce administrative sanctions	HOA	X	X	X	HR, admin records
1.2	Conduct ethical leadership training	HOA	X	X	X	-do-
1.3	Lead implementation of Ethics & Integrity management tools in the respective Divisions/Units	HOA	X	X	X	HR records, Annual Compact Performance (CP) agreement
1.4	Strengthen the role or identify integrity focal person	HOA	X	X	X	Admin & HR records
1.5	Strengthen declaration & management of assets, conflicts of interest and gift; code of conduct; grievance redress mechanism/whistleblowing avenues/etc.	ADM-HRO	X	X	X	CP, admin & HR records
1.6	Conduct risk assessment in vulnerable services and implement recommendations emanating from proactive/reactive system studies, internal assessments, audits, etc.	ADM-HRO/Finance Division	X	X	X	same as above and finance records
1.7	Develop/enhance service delivery standards & communicate to users	Communication Officer/Data Manager/ADM-HR	X	X	X	Website, IIMS, publications
1.8	Institute open forum to disseminate HRC/Management decisions & enhance internal	Division Chiefs and ADM-HR	X	X	X	Minutes of meetings

	communication						
1.9	Institute/strengthen internal audit mechanism/functions of internal audit	HOA/Finance Chief	X	X	X	Audit reports	
1.1 0	Implement Integrity Vetting System/Fit and Proper check	HOA/ Chiefs/ ADM-HRO	X	X	X	HR records, CP	Actual implementation will be done by FY2020-21
1.1 1	Enhance system of documentation on disciplinary actions taken	ADM-HRO	X	X	X	HR and admin records, office orders	-do-
1.1 2	Strengthen audit trails systems to maintain confidentiality of data	HOA/Finance Chief/ADM	X	X	X	Relevant documents/ records	
1.1 3	Enhance the role of political parties, CSOs/NGOs, media & cooperatives in governance	HOA/Communi cation section	X	X	X	Publications/ project reports, website,	
1.1 4	Strengthen compliance to Service Regulations	HOA/ADM-HRO	X	X	X	Admin & HR records	
<b>AKRA 2: Integrity consciousness enhanced</b>							
2.1	Dedicate a day annually and sensitize on ethics, integrity and anti-corruption tools	ADM-HRO	X	X	X	CP, minutes of meetings,	
2.2	Include ethics and integrity programs in respective training modules	HOA/ADM-HRO	X	X	X	Annual Report, website	

## 6. PROJECT TIME EXTENSION POLICY

### 6.1. Background

The BTFEC funds Management Board (MB) approved grants of up to ngultrum 15 million for a maximum period of three years, Secretariat approved small grants (SC) of up to ngultrum four hundred thousand for a maximum period of 12 months and project feasibility and preparatory grants of up to ngultrum one hundred fifty thousand. In the event the proponent(s) request time extension for MB or SC grants, the requests are considered for approval on the following basis:

- i. Not able to complete the project due to an “unavoidable circumstance”.
- ii. Proposes new activities without seeking additional funding.

Qualifying “unavoidable circumstances” will include the following:

- i. unpredicted natural calamities such as extreme weather conditions.
- ii. Ad-hoc executive orders for government agencies/authorities.
- iii. Delay effected due to co-financing requirements.
- iv. Change in focal persons due to inevitable situation.
- v. Delay in fund release from the RGoB or BTFEC.

However, BTFEC has the right to decline the project time extension if justifications are not found to be genuine and adequate.

### 6.2. Objective and Scope

To ensure completion of project implementation and achievement of its outcomes.

This project time extension policy will apply to all BTFEC grantees and proponents.

### 6.3. Strategy

- i. A grantee shall apply for time extension at least 30 days before the project completion date;
- ii. All Government agencies non-governmental grantees shall directly apply to BTFEC Secretariat;

- iii. BTFEC shall vet and verify the justification and if required, field verifications may be carried out;
- iv. Director is the approving authority;
- v. Projects with co-financing modality, grantees should ensure the time extension requested is for BTFEC's funded components;
- vi. The maximum time extension is for 12 months and the BTFEC reserves the right to accept or decline the proposal.

## 7. WHISTLE BLOWER POLICY

### 7.1. Background

This policy is designed to address situations in which Governing body and committees, BTFEC Secretariat suspects another individual has engaged in un-ethical practices or questionable conduct involving BTFC's assets and mis-use of authority. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, mis-statements of any accounts to any manager or to BTFEC's auditors, or even an employee's conflict of interest that results in financial harm to BTFEC. BTFEC encourages Governing body members, TAP, AMC, BTFEC management and Secretariat to report such questionable conduct and has established a system that allows them to do so anonymously (contact point: [info@bhutantrustfund.bt](mailto:info@bhutantrustfund.bt))

If an employee suspects illegal conduct or conduct involving misuse of BTFEC assets or authority in violation of the law, he or she may report it, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination or retaliation for making such a report in good faith.

### 7.2. Objective and Scope

The objective of the whistle blower policy is to establish a mechanism for the reporting un-ethical practices or the misuse of BTFEC assets and mis-use of authority to pre-empt retaliation.

This policy is applicable to Governing body, committees, and BTFEC Secretariat.

### 7.3. Strategy

The BTFEC will pursue all reasonable steps to protect whistle blowers and witnesses acting in good faith and to ensure that they are not subject to any form of harassment/discrimination/retaliation. Some of these could be:

- i. Danger of physical harm to the person or family;
- ii. Discriminatory treatment at workplace in the form of transfers, biased appraisals, unfair work assignments, etc;

iii. Any other form of retaliation or harassment.

Any of the above acts whether actually taken or threatened require protection for the whistle blowers and witnesses.

Governing body and committees, BTFEC Secretariat who have either reported an alleged un-ethical practice or the misuse of BTFEC assets or authority and who feel that they are being subjected to or are likely to be subjected to some form of discrimination/retaliation as a consequence of the reporting can approach the national competent authority either personally or in writing and request for protection.

The competent authority would initiate appropriate actions within the organization or, if required, take up the matter with the appropriate authorities outside the organization to provide necessary protection to the whistle blowers/witnesses. It is essential that the actions being taken are likely to result in adequate protection and also minimize the apprehensions of the complainant.

The competent authority will inform the whistle blowers/witnesses of the actions taken or being taken leading to cessation of the protection responsibility.

## 8. FRAUD AND CORRUPTION POLICY

### 8.1. Background

The Bhutan Trust Fund for Environmental Conservation (BTFEC) adopts the Fraud and Corruption (F&C) Policy to ensure good governance and effective management. The policy will provide a framework for the Governing body members, TAP, AMC, BTFEC management, Secretariat, partners, grantees, volunteers and interns in the prevention, detection, reporting and management of F&C.

To facilitate the implementation of an effective corruption control system, the BTFEC Secretariat has other policies, such as Internal Control Policy, COI policy, Dispute Resolution Policy and Whistle Blower Policy.

The policy is based on the following principles:

- i. A sound ethical culture  
*Ensure and promote a sound culture of ethics and integrity.*
- ii. Leadership commitment  
*Leadership and senior management shall demonstrate a high level of commitment to control risks of F&C within the organization.*
- iii. Management and staff awareness  
*Every employee shall have general awareness of F&C and other related policies.*
- iv. F&C detection, reporting and protection mechanisms  
*There shall be in place an implementation system for fraud and corruption incidence reporting; and ensure protection of those reporting.*

### 8.2. Objective and Scope

The objective of the F&C policy is to comply with its zero-tolerance principle (Anti-Corruption Commission: ACC) and complying with all policies and procedures adopted to prevent fraud and corruption in the organization.

This F&C policy applies to the Governing body, committees, BTFEC Secretariat, grantees, volunteers, and interns.

### 8.3. Strategy

In order to implement the F&C policy, BTFEC:

- i. Requires the Governing body and committees, BTFEC Secretariat, partners, grantees, volunteers and interns to comply and adhere with all the relevant BTFEC policies.
- ii. Requires the Governing body and committees, BTFEC Secretariat, grantees, volunteers, and interns should be sensitized and trained on the implementation all the BTFEC relevant policies.
- iii. Will publicly communicate that it is committed to high standards of professional conduct and ethical management practices.
- iv. Seeks at all times to deal with its Board members, employees, grantees, volunteers, interns, partners, supporters and suppliers with honesty and integrity. It expects these individuals to treat each other, in the same manner.
- v. Will, where there is evidence or the possibility of fraudulent or corrupt activities, deal with them in a firm and controlled manner.
- vi. Will implement appropriate internal controls, which address the organization's operating environment and specific risks.
- vii. Where proven fraudulent or corrupt activity by an employee will be treated as gross misconduct and appropriate disciplinary action will be taken, up to and including termination of employment or grant. Whether an employee or a person external to BTFEC commits the fraud, it may also initiate civil action to recover losses.
- viii. Will institute a fraud investigation structure to demonstrate that the investigations function is executed within the organization and that it is independent and has access to report findings to the highest levels of the organization, if needed (Annexure III):
  - a. Designate a focal person for receiving and processing complaints and grievances;
  - b. Any incidence of fraud allegation will be referred to the board for further deliberations. If the board so decides, the case may be forwarded to the Anti-Corruption Commission (ACC) for investigation;

- c. The board will grant full authority and support to the designated investigation officer from the ACC to carry out the investigation(s) exhaustively;
- d. The investigation officer must report the investigation findings to the board who may decide to forward such a case to the ACC for further decision as per the ACC act of Bhutan.

## 9. INTERNAL CONTROL POLICY

### 9.1. Background

An effective internal control system provides reasonable assurance that the organization will achieve its mandates, in order to adequately safeguard its assets, provide reliable information, and meet compliance requirements. It may be important that the costs of internal controls should not exceed its benefits.

Internal control is an approach, effected by an organization's governing body, management and other personnel, devised to reasonably manage risk to achieve its mandate, and to adequately safeguard its assets, compliance, good governance, reporting and improved organizational operation.

### 9.2. Objectives and Scope

The purpose of internal control policy is to strengthen BTFEC's governance, safeguard its assets, ensure reliability of its financial system and other information, and prevent fraud and corruption. Specifically, the internal control policy shall:

- i. ensure compliance to the Royal Charter of 1996 and Bylaws-2014, Operation Manual, and all the other relevant policies.
- ii. enhance effectiveness and efficiency of the Secretariat's operations, including operational and financial performance goals;
- iii. improve and standardize internal and external financial and non-financial reporting with reliability, timeliness, and transparency;

This policy will apply to Governing body, committees, BTFEC Secretariat, relevant stakeholders, volunteers and interns.

### 9.3. Strategy

The BTFEC shall:

- i. Ensure that the internal control policy implementation shall include application and administering of all the other BTFEC relevant policies;
- ii. Demonstrate a commitment to integrity, transparency, accountability, sustainability

- and ethical values;
- iii. Require Governing body and committees, BTFEC Secretariat, partners, volunteers and interns be sensitized and trained on the implementation of all the relevant BTFEC policies;
  - iv. Put in place all necessary policies and system that ensure specific and segregated responsibilities to its staff, which provides effective check and balance that hinder embezzlement/fraud;
  - v. Record grants and contributions, complete all accounting requirements as a condition of grants, and comply with restriction/prohibitions on the use of the grant funds and the principles of the endowment;
  - vi. Identify and assess changes that could significantly impact the system of internal control;
  - vii. Provide timely, reliable and accurate financial and other information;
  - viii. Continuously improve the existing monitoring and evaluation system;
  - ix. Identify and analyze risks, and develop and manage appropriate responses to risks within acceptable levels and with a greater focus on anti-fraud measures;
  - x. Though the implementation and operationalization of all the other BTFEC relevant policies, create conducive environment to ensure implementation of best practices on the overall management system;
  - xi. Overall best practices management.

## 10. ANNEXURES

### Annexure I: Template for Advocacy fund request

Advocacy title	
Implementing agency	
Fund requested	
Start and end date	
Applicant	Name: Mobile number: Email: CID: Proof of past advocacy works:
Provide detail explanation on the following:	
1. Rationale <ul style="list-style-type: none"> <li>- The purpose of the activity proposed</li> <li>- Benefits of the activity</li> </ul>	
2. Program <ul style="list-style-type: none"> <li>- List of activities and its explanations</li> </ul>	
3. Target audience <ul style="list-style-type: none"> <li>- Who participates?:</li> <li>- How many?:</li> </ul>	
4. Advocacy message <ul style="list-style-type: none"> <li>- Proposed environmental advocacy message</li> <li>- Any other</li> </ul>	
5. BTFEC Advocacy <ul style="list-style-type: none"> <li>- How BTFEC can be promoted</li> </ul>	
6. Work Plan and Budget breakdown	
7. Advocacy fund report: details of how the fund was expended and outputs achieved (in soft of hard forms)	

**Annexure II: Conflict of Interest form**

**BHUTAN TRUST FUND FOR ENVIRONMENTAL CONSERVATION (BTFEC)**

**DECLARATION OF CONFLICT OF INTEREST**

This form must be signed by all members of the Board/GAC/AMC/TAP of BTFEC prior to any deliberations at the BTFEC Meetings.

**Purpose of the Meeting** : \_\_\_\_\_

**Date of the Meeting** : \_\_\_\_\_

I have no conflict of interest to report

I have the following conflict of interest to report (please specify):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

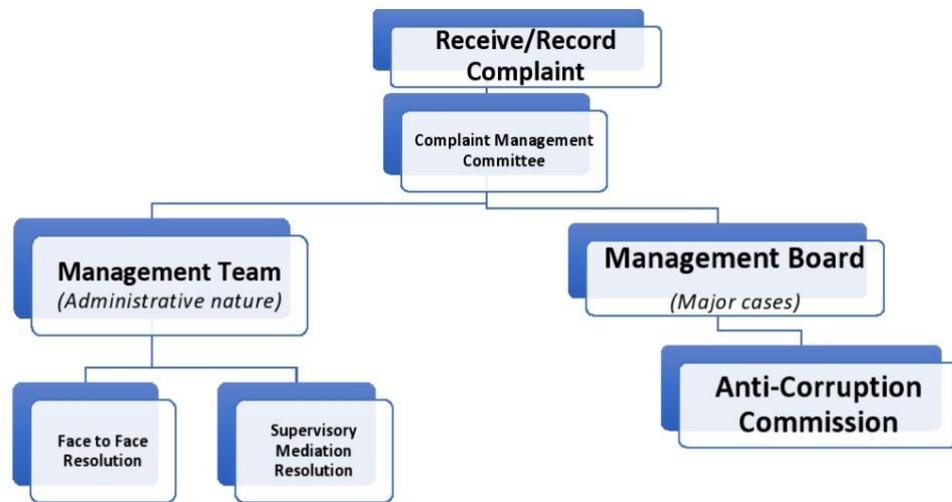
The undersigned, by their affixed signature, note their understanding of the implications of this declaration.

**Signature:** \_\_\_\_\_

**Printed Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

### Annexure III – Structure and Procedure for reporting grievances, Fraud and Corruption and investigation



**PROCESS:**

**Step 1:** Complaints made through electronic/postal mails shall be received and acknowledged by at least two BT FEC officials. Likewise, complaints received through verbal/telephonic mode shall be attended by at least two officials.

**Step 2:** All complaints shall be maintained/recorded in the BT FEC Complaint Register by the designated focal official.

**Step 3:** According to the nature of the case, the Complaint Management Committee shall forward the case either to the Management Team or the Management Board for further actions.

**Step 4:** Administrative nature cases shall be resolved within the BT FEC Secretariat through Face to Face discussion or Supervisory mediation. Unresolved cases shall be forwarded to the Management Board for further actions, which may further submit the case to the Anti-Corruption Commission for directives and actions.

**Complaints may relate to:**

- Fraud and Corruption on operations of the BT FEC
- Environmental and Social matters related to a BT FEC project
- Gender matters related to a BT FEC project
- Dissatisfaction with the BT FEC’s policy or procedure
- Disagreement with a decision of BT FEC
- Failure of appropriate administrative process
- Conduct/behavior of BT FEC secretariat staff

The BT FEC will pursue all reasonable steps within its mandate to establish an efficient and unbiased management of complains based on:

- **Accessibility**

Complaints can be made either verbally or in writing, in person, by telephone, by email but wherever possible, complaints should be confirmed in writing signed by the complainant complete with address.

- **Responsiveness**

Complaints shall be dealt with promptly and professionally. The process and time needed to resolve an issue vary depending on the nature and complexity of the issue.

- **Accountability**

BT FEC shall be responsible and accountable for handling the complaints

- **Confidentiality**

Confidentiality shall be respected at all times within the limitations of the need to fully investigate the complaint.

Download the **COMPLAINT FORM**. Send the completed form to [info@bhantrustfund.bt](mailto:info@bhantrustfund.bt)

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