



PROJECT GRIEVANCE REDRESS MECHANISMS – PACIFIC CASE STUDIES

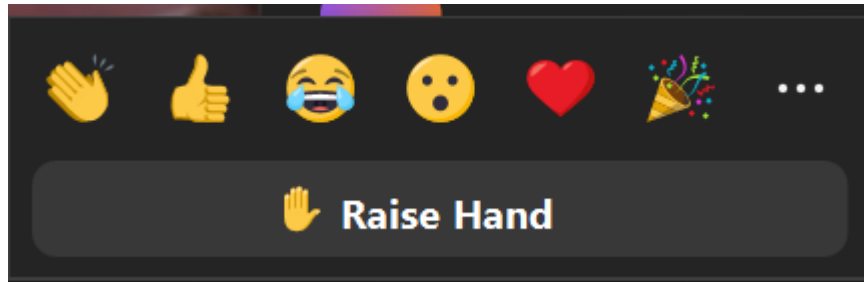
Pacific Learning Partnership for Environmental and Social Sustainability (PLP-ESS)

Learning Objectives

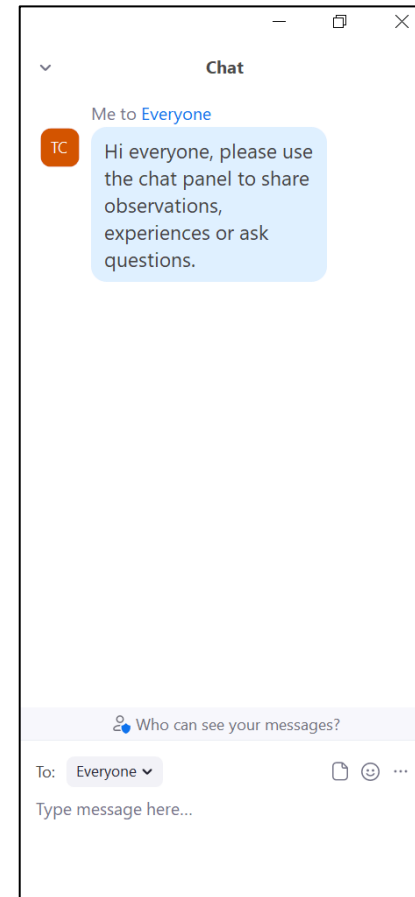
- Describe the Grievance Redress Mechanism requirements for World Bank-financed projects.
- Communicate why project GRM's are important
- Outline the key elements for developing and implementing robust project GRMs and be able to apply this to your work.

Zoom Functions

- Use the 'reactions' functions as we go



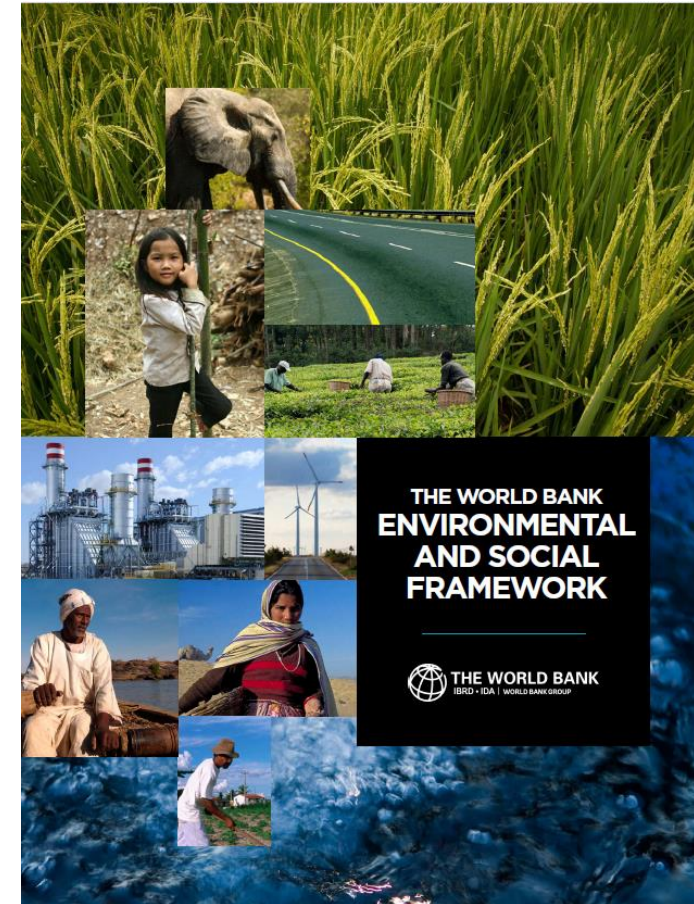
- Raise your hand if you want to speak
- Use the 'chat' function



Grievance Redress Requirements

Communities and individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to:

- **Project-level Grievance Redress Mechanisms (GRMs)**
- World Bank's [Grievance Redress Service \(GRS\)](#),
- World Bank's [independent Inspection Panel \(IP\)](#).



Grievance Redress Requirements

2. Management and Information Disclosure



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The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

The Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.

Grievance Redress Requirements



Grievance Mechanisms: A Critical Component of Project Management¹

The road to successful project implementation is paved with good intentions. But in our complex and increasingly transparent world, community and employee stakeholders do not always see eye to eye with project objectives, in spite of well-designed and executed plans. Whether the issue is compensation for the relocation of homes or the threat to long-standing cultural norms, project implementation can raise questions and create concerns. A well-functioning grievance mechanism can resolve problems faced by individuals, and it can provide valuable information for managers tasked with implementation.

Defining Grievance Mechanisms

Grievance mechanisms are systems or specified procedures for methodically addressing grievances or complaints and resolving disputes.² In recent years,

an increasing number of grievance mechanisms have been designed and implemented by private institutions at the local, national and global levels. Grievance mechanisms are used to identify and respond to issues on individuals, to ensure that the rights of parties are respected, and to increase the likelihood that project implementation will proceed without undue delay or complication.

Unlike judicial remedies in which the state is established process based on legal frameworks, nonstate-based grievance mechanisms are voluntary agreements between parties as a methodology for resolving complaints against another. An alleged abuse or wrong brought about by an organization's activities is addressed between the complainant and the institution or private enterprise.

¹ This paper was written by Doug Cahn, a consultant hired by the Asian Development Bank (ADB) during the period of September 2009 to February 2010. The paper discusses how grievance mechanisms and complaints are used interchangeably here.



Note is one of a series that provide information on the identification, assessment, and mitigation of environmental and social impacts of investments. The notes complement the Environmental and Social Safeguard Policy and the Environmental and Social Operational Procedures.



SUPPORT DEVELOPMENT AND IMPLEMENTATION OF REDRESS PROCEDURES

It is important – Setting up appropriate mechanisms to air and address community concerns can help to identify and address adverse impacts on people and communities, improve the outcomes of aid programs, and manage project risks. The voicing of grievances is part of complex development processes, in fact, could be a source of concern. During planning and implementation, grievances are very likely to arise in program investments. In investments involving displacement and re-settlement but are also common in investments that are perceived to have an adverse impact on the environment or communities. Compensation amounts or timing for displacement or resettlement may be questioned. Some investments have been wrongly classified as ineligible for some form of assistance. Other issues may include noise and vibration or the quality of housing at resettlement sites. Grievances may also arise as a result of unexpected damages to property by construction contractors in the vicinity of the project, or restrictions on access to community resources. An effective grievance redress mechanism serves two important purposes. For affected people, it provides a simple and credible channel for seeking to resolve complaints, increasing the likelihood that project goals and objectives can be achieved. Just as important, early identification of and response to grievances minimizes two risks to the investment: that grievances will escalate into judicial action or public controversy; and that they will result in lengthy delays in implementation and associated cost overruns. Investment experience shows that inadequate or untimely response to grievances can turn problems more costly and intractable than they need to be.



QUIZ



A Project GRM should be put in place by the borrower to receive, evaluate and address all grievances in communities where the project is being implemented.

- True
- False

TYPE YOUR ANSWER IN THE CHAT

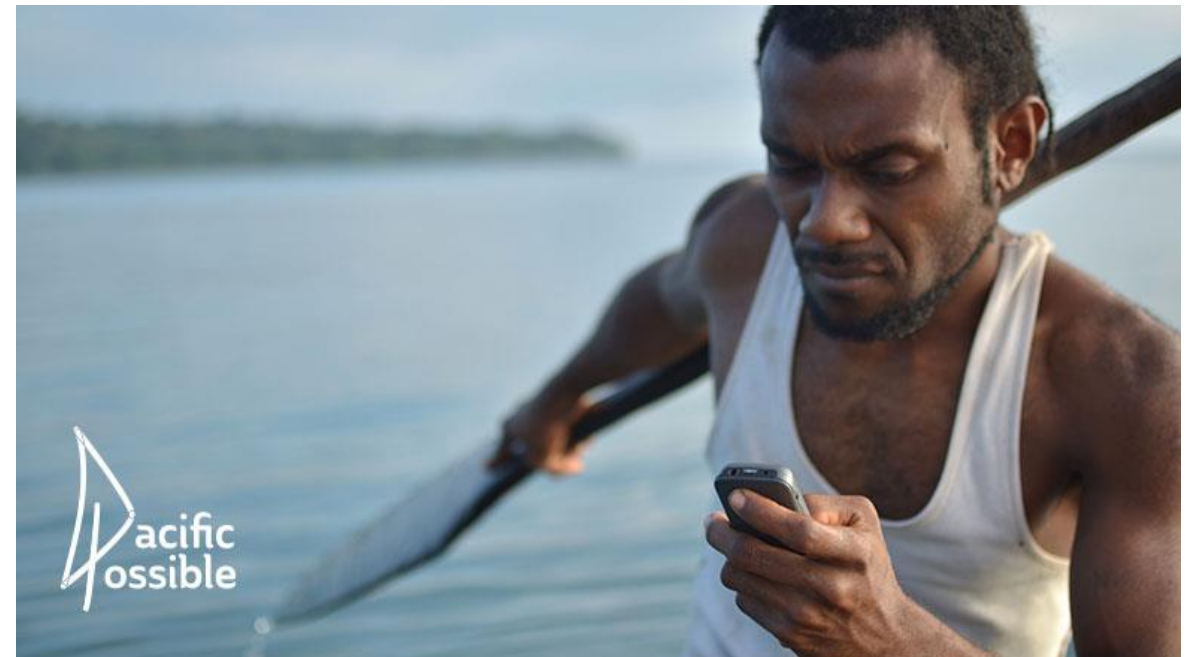


What is a Project GRM?

IS a process for receiving, evaluating, and addressing project-related grievances from affected communities or stakeholders at the level of the community or project, region, or country.

Purpose:

- Increase participation of beneficiaries
- Minimize adverse project related impacts on people and the environment
- Manage project-related issues to avoid implementation delays
- Ensure projects achieve their objectives.



Inadequate consultation

Impacts on cultural sites

Unsafe work site

Impacts on economic assets

Water Pollution

Land impacts

Speeding vehicles

Types of Project Grievances

Corruption

Unfair recruitment practices

Sexual exploitation

Dust

Noise pollution

Inequitable Access to benefits

Exclusion of IPs

Poor working conditions

Inadequate compensation

Why Don't People Complain?

What are some of the barriers to making a complaint for vulnerable or disadvantaged groups? (BRAINSTORM IN THE CHAT)

- Illiteracy
- Lack of knowledge about their rights
- Local culture and traditions (including powerful interests)
- Mistrust in government and fear of retribution
- Lack of access to technology
- Perceived hassle of complaining, and
- Belief that project authorities will not act upon their grievances.

Developing a robust project GRM

ESS10 Key requirements:

- Proportionate to the risks and impacts
- Accessible and inclusive
- Culturally appropriate
- Discrete/confidential
- Allows for anonymity
- Promptly and effective resolution
- Stakeholders informed/mechanism disclosed

Key Elements:



Developing a robust project GRM

1. Procedure

- Multiple lodgment channels
- Clear steps and governance arrangements
- Clear response/resolution timelines
- Utilizes existing/traditional mechanisms
- Clear, transparent and widely disclosed



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Grievance Redress Mechanism

PREP Tonga Grievance Redress Mechanism

The PREP Tonga Grievance Redress Mechanism (GRM) allows project affected people/beneficiaries, project staff/volunteers and other stakeholders to provide feedback or to seek satisfactory resolution to grievances they may have in relation to implementation of the PREP Project and its activities. The GRM helps to ensure that rights and interests of affected people/beneficiaries are protected, and concerns are adequately addressed. The grievance process is based upon the premise that it imposes no cost to those raising the grievances (i.e., complainants); that concerns arising from project implementation are adequately addressed in a timely manner, and that participation in the grievance process does not preclude pursuit of legal remedies under national law.

PREP Tonga grievance mechanism involves the following:

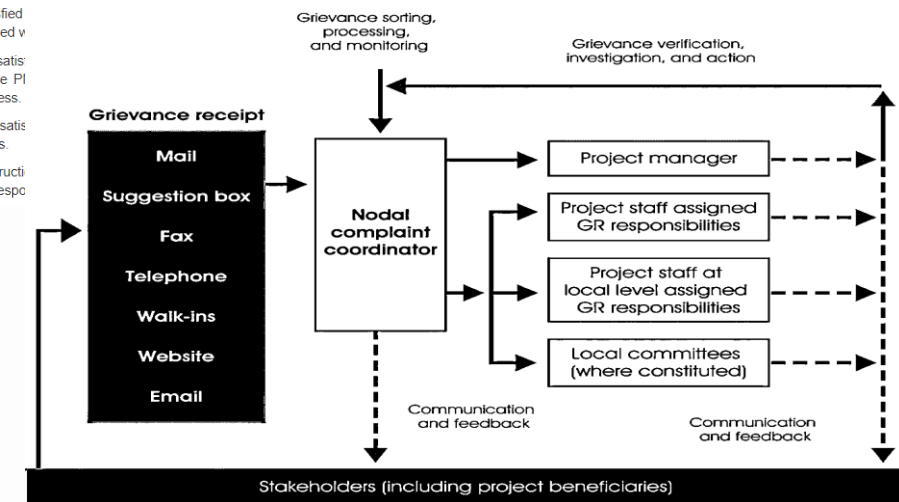
Stage 1: any person aggrieved by any aspect of the project can lodge an oral or written grievance directly to the Project Management Unit (PMU)* or via a nominated local representative. The PMU will see resolved within 30 days of receipt, it advances to :

Stage 2: if the aggrieved person is not satisfied Coordinator. If the complaint cannot be resolved v

Stage 3: if the aggrieved person is still dissatis MEIDECC CEO, Project Coordinator and the PI committee, it advances to stage 4 of the process.

Stage 4: if the aggrieved person is still dissatis accordance with national laws and procedures.

* Feedback or complaints relating to school reconstructi Ministry of Education and Technology's Emergency Respo



Developing a robust project GRM

2. Roles and Responsibilities & Training

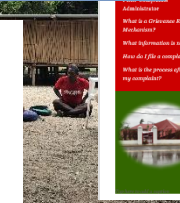
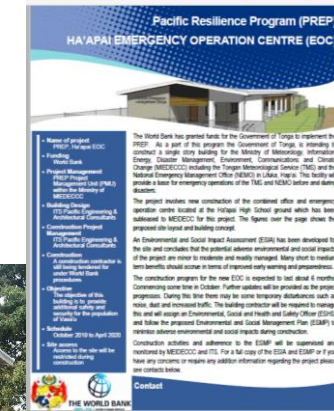
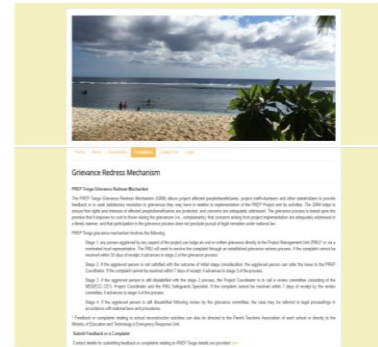
- Project staff, government, contractor, community responsibilities (outlined in TORs, contracts, agreements etc)
- Training for those with responsibilities



Developing a robust project GRM

3. Awareness Raising

- All project affected people/beneficiaries are aware of and can access GRM
- Culturally appropriate
- Reaches vulnerable/disadvantaged groups



Developing a robust project GRM

4. Lodgment Channels

- Multiple channels
 - Village representative
 - Suggestion box
 - Telephone
 - Text line
 - Email
 - Face-to-face
 - Social media
- Culturally appropriate
- Considers vulnerable/disadvantaged groups

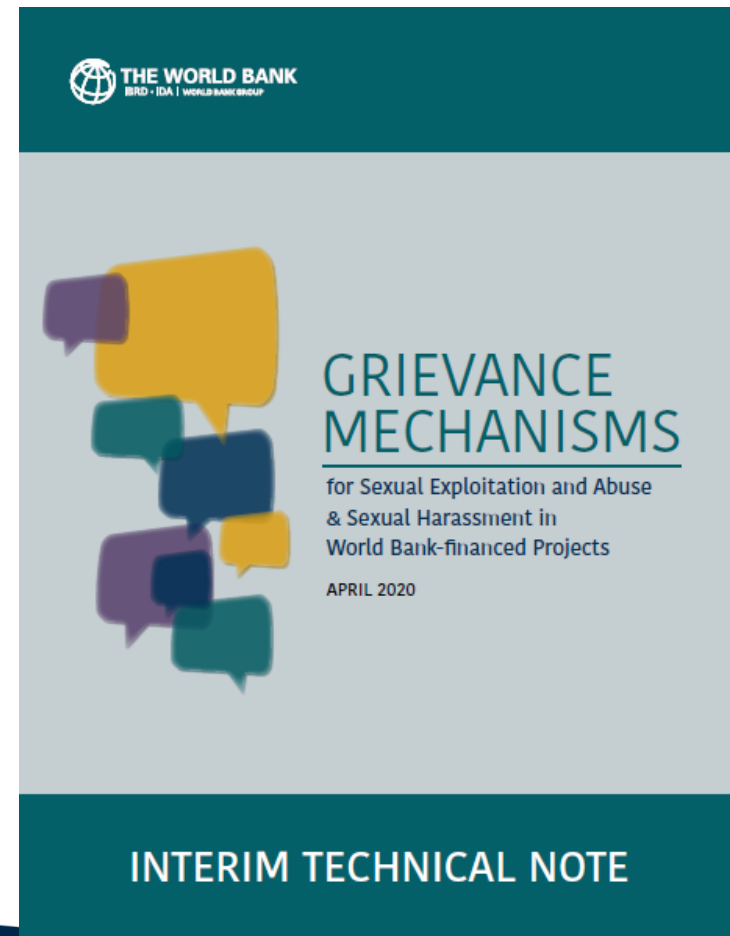


Developing a robust project GRM

5. Recording, prioritization, investigation, mediating/resolving and feedback

- GRM form
- Categorize and Prioritize
- Be clear on how the project will acknowledge, investigate and provide feedback

What's different about responding to a GBV complaint?



Developing a robust project GRM

6. Tracking and Reporting

- Grievance register and filing system
- Grievance reporting in progress reports

Complaints and Grievance Record.xlsx - Excel

File Home Insert Draw Page Layout Formulas Data Review View Tell me what you want to do

Clipboard Font Alignment Number Styles

UPLOAD PENDING Click Save to retry your upload. Save

J4 1/4/2017 Contractor has visited the school and has identified the times of day where no heavy machinery will be used.

	B	C	D	E	F	G	H	I	J
1									
	Name / Anonymous	Contact details	Gender M / F / Unkno wn	Date Received	Method: Phone/email/mai l/ complaints box	Issue Type: Request for Information Feedback Concern Grievance	Summary of Issue	Responsibility: contractor / PM / Safeguards /	Action Log Include Date and Action.
2									



Record of Complaints & Grievance



Developing a robust project GRM

7. Monitoring and Evaluation

- Is the project GRM working?
- How can info on grievances inform better project implementation?

HOMEWORK!

Evaluate your project's GRM using the new World Bank GRM checklist:

<http://pubdocs.worldbank.org/en/354161530209334228/ESF-Checklist-ESS10-GRM-June-2018.pdf>

Grievance Redress Mechanism Checklist

The appropriate level of complexity of a project's Grievance Redress Mechanism (GRM) depends on the risks and impacts of the project and the project context. The following checklist describes a complex GRM that adheres to good international practice, which may not be necessary for all projects. Nevertheless, this checklist helps to determine whether a grievance mechanism conforms to good international practice.

A. System issues

1. Does the project invite feedback/grievances? Yes ___ No ___
2. Does the organization have a policy on grievance redress? Yes ___ No ___
 - a. Is the policy available to all staff, beneficiaries, and potential users? Yes ___ No ___
 - b. Is the policy written in the local language(s)? Yes ___ No ___
3. Does the grievance mechanism have the following features?
 - a. A clearly understood procedure for people to provide feedback and/or submit grievances. Yes ___ No ___
 - b. A statement of who is responsible for dealing with feedback/grievances. Yes ___ No ___
 - c. Procedures for resolving or mediating and investigating grievances depending on their seriousness and complexity. Yes ___ No ___
 - d. A system for keeping complainants informed of status updates. Yes ___ No ___
 - e. A system for recording feedback/grievances and outcomes. Yes ___ No ___
 - f. Procedures for protecting confidentiality of complainants Yes ___ No ___

B. Staff management

1. Is there a grievance manual for staff?
2. Do the grievance policy and/or procedures provide guidance on:
 - a. What is a grievance/feedback? Yes ___ No ___
 - b. What information to collect from complainants? Yes ___ No ___
 - c. What remedies can or should be used to resolve grievances? Yes ___ No ___



GRM: Major infrastructure project

Solomon Islands

- **Stakeholder group:** unclear- complaint is anonymous
- **Risk:** claim lack of planning leading to health and safety issues. Lots of issues raised but not a lot of detail.
- **Key features:**
 - Multiple implementation agencies for GRM- developer, construction contractor, Government.
 - Transfer of responsibilities around time of complaint.

Challenges

- Limited engagement with complainant
- Potentially significant non compliances

Opportunities

- Can still investigate- ask relevant partners to report on claims and provide evidence.
- Send response to anon email address.
- How to close? Give adequate time.
- Be mindful of confidentiality- retaliation must not occur.

GRM: Road Rehabilitation

Samoan Climate Resilience Transport Project

- **Key Stakeholder group:**
Communities along road
- **Risks:** Land/assets, health & safety, Noise, dust, GBV etc... (potential to delay works)
- **Key features:**
 - Contractor/supervision consultant and government avenues
 - Site specific awareness
 - Web-based Register
 - GBV response

Challenges/Opportunities

- Contractor grievance management
- Coordination between 4 IAs
- Partnership with Ministry of Women to respond to GBV issues



GRM: Community Driven Development

Rural Service Delivery Project, Papua New Guinea

- **Key stakeholder group:** Eligible wards/communities
- **Risk:** Real/perceived inequity; community unrest; OHS etc...
- **Key Features**
 - Multiple levels: 1) community/ward; 2) Local Government; 3) Provincial; 4) PMU
 - Awareness – CDD approach
 - MIS System to record and track
 - Simplified do's and don't code of conduct

Challenges/Opportunities

- Raising awareness about the GRM
- Utilizing traditional village mechanisms
- Operating across 5 provinces; 20 LLGs; ~400 wards



Roles and Responsibilities

Implementation level	Governance structures	Staff	Roles and responsibilities
Ward/ Community	CDD Sub-Committee	Chairperson	Reports to the WDC on all project activities. Presents grievances to the WDC.
		Safeguards champion	Receives grievances at the community level and presents them to the chairperson.
	Ward Development Committee	Ward Member	Responsible in providing feedback and solutions to grievances at the Ward Level.
Local Level Government	Local Level Government	LLG Manager	Overall responsibility for implementing the GRM at the LLG level. Responsible in providing feedback and solutions to <u>unsolved</u> grievances received from the Ward Level.
		CDW	Awareness raising on GRM to the wider community. Facilitation and training of community representatives involved in handling grievances. Receiving, recording and resolving grievances at the community level or escalating grievances where necessary.
		TFs	Assist the CDW in receiving, recording and resolving grievances at the community level or escalating grievances where necessary.

Province	Provincial Project Office	Provincial Project Coordinators	Overall responsibility for implementing the GRM at provincial level. Providing reports of referred grievances to the Provincial LLG Advisor. Responsible in providing feedback and solutions to <u>unsolved</u> grievances received from the PPO level.
		RISs	Lead on-ground implementation of GRM in all LLGs.
		Admin Assistant	Manage grievances received (refer cases to DPM or CDDSS).
National	Project Management Unit	Project Manager	Responsible in providing solutions to <u>unsolved</u> grievances received from the PPO level that are of serious nature.
		Deputy Project Manager	Overall responsibility for developing/implementing the GRM.
		CDD & Safeguards Specialist	Ensure day-to-day implementation of GRM through the PPO team.
		Capacity Building Specialist	Ensuring all relevant staff are trained in GRM. Update training resources on GRM practices.
		M&E Specialist	Receive progress reports with GRM and maintains database.
		Admin Assistant	Manage grievances received (refer cases to DPM/CDDSS and on-ward referral to appropriate level/staff).
	DPLGA	Project Director	Responsible in providing solutions to <u>unsolved</u> grievances received from the PMU level that are of serious nature.

Top tips

- Start with what stakeholders already do- what already works, what needs to be added?
- Have GRM in place early, especially for projects involving land or change in access.
- Makes sure roles and responsibilities are clear- internally and externally.
- Be mindful of confidentiality.
- Meet deadlines and communicate if you cant.
- Record all grievances, even the little ones. Its all useful!
- Keep it simple- process, forms, recording...
- Design for most vulnerable
- No grievances? Something isn't working!

Questions?

Useful resources

- [World Bank GRM Checklist](#)
- World Bank [How to Note: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects](#)
- World Bank Interim Technical Note: Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects (available on request)
- World Bank (IFC/MIGA) Compliance Adviser Ombudsman: [GRM Toolkit](#)