



# GRIEVANCE REDRESS MECHANISMS & REPORTING

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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.

# Webex Training Functions

### Raise Hand

Participants Chat Recorder

Participants

Speaking:

Panelist: 1

Thomas John Callan... (Host, me)

Attendee: 0

Audio

Chat

Polling

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### Chat

Participants Chat Recorder

Participants

Chat

Send to: All Participants

I've got a question

Send

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Participants Chat Recorder

Participants

Chat

Recorder

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Participants

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GRM\_...

Poll Questions:

1. What is your favourite colour

- a. Blue
- b. Green
- c. Purple
- d. Orange

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# Recap: Stakeholder Engagement & Information Dissemination

## Why engage?

- Improves project outcomes
- Hearing from diverse voices means things don't get missed
- Listening to suggestions bring improvements

## Take-home Messages

- Identify stakeholders
  - Affected
  - Interested
  - Vulnerable Groups
- Consider different stakeholders needs and how best to engage
- Be clear and transparent about how the project will engage
- Change and adapt over the course of the project

# Recap: Stakeholder Engagement & Information Dissemination

## ESS 10 Objectives:

- Establish a *systematic approach to stakeholder engagement* that helps Borrowers identify stakeholders and maintain a *constructive relationship* with them
- Assess *stakeholder interest and support* for the project and enable stakeholders' views to be taken into account *in project design*
- Promote and provide means for effective and inclusive engagement with project-affected parties *throughout the project life-cycle*
- Ensure that appropriate project information is disclosed to stakeholders in a *timely, understandable, accessible and appropriate* manner

# Stakeholder Engagement and Grievance Management

- **Stakeholder Engagement and Information Dissemination** – actively seek input/feedback, share information and manage expectations
- **Grievance Management** – actively source and manage project related complaints in a timely manner.



# QUIZ

**1. How many times is the word 'grievance' mentioned in the World Bank Environmental and Social Framework?**

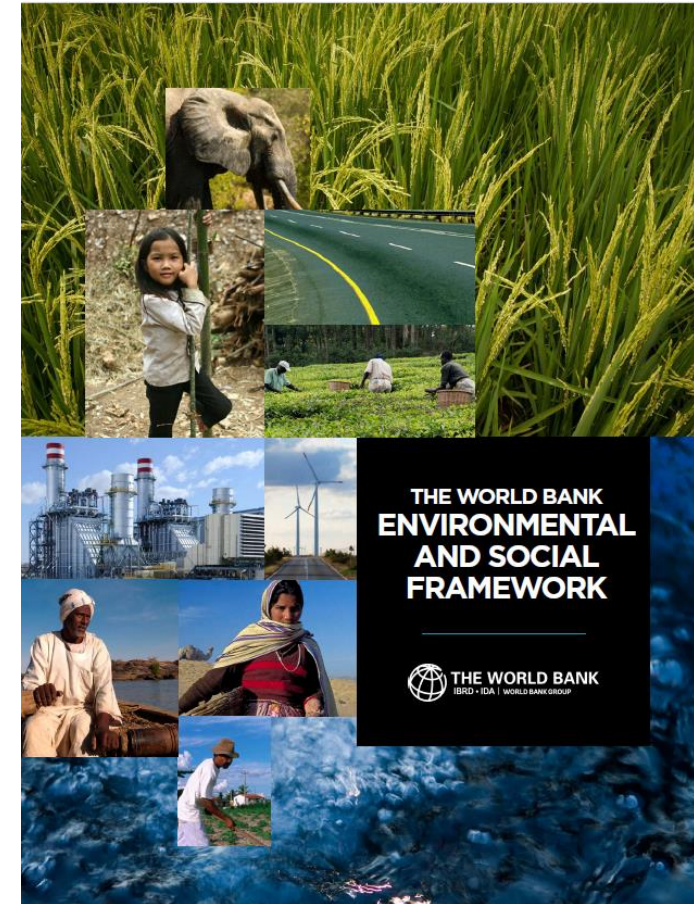
- a) 24
- b) 53
- c) 86
- d) 104



# Grievance Redress Requirements

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

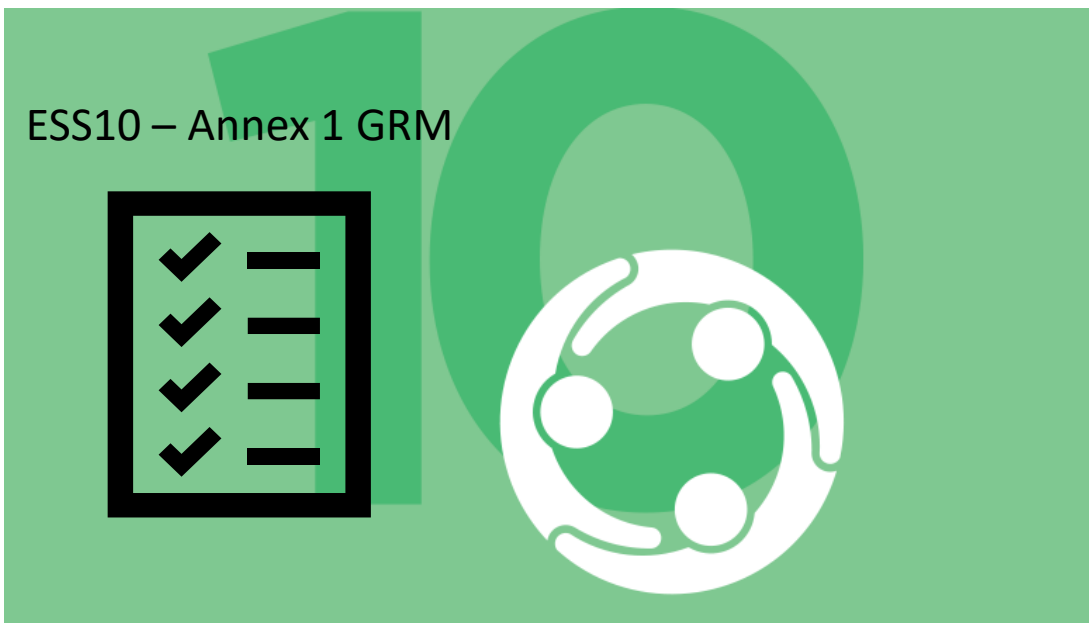
- **Project-level Grievance Redress Mechanisms (GRMs)**
- World Bank's [Grievance Redress Service \(GRS\)](#), and
- World Bank's [independent Inspection Panel \(IP\)](#).





# Grievance Redress Requirements

## ESS 10 – Stakeholder Engagement and Information Disclosure



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

## ESS 5 Land Acquisition, Restrictions on Land and Involuntary Resettlement



GRM established in accordance with ESS10 as early as possible

To address specific concerns about **compensation, relocation or livelihood restoration measures** raised by displaced persons (or others) in a timely fashion.

Outlined in relevant instruments (i.e. RPF, RAP/ARAP or Process Framework)

# Grievance Redress Requirements

## ESS 7 – Indigenous Peoples



GRM established in accordance with ESS10

Is culturally appropriate and accessible to affected Indigenous Peoples

Takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples

# Grievance Redress Requirements

## ESS2 – Labor and Working Conditions



- A grievance mechanism will be provided for all direct workers and contracted workers..
- This grievance mechanism will be provided separately from the grievance mechanism required under ESS10.

# Grievance Redress Requirements



## Grievance Mechanisms: A Critical Component of Project Management<sup>1</sup>

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.<sup>2</sup> 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 unmet needs 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 non-compliance brought about by an organization's activities is addressed between the complainant and the institution or private enterprise.

<sup>1</sup> 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 and its contents are used interchangeably here.



## Good Practice Note Addressing Grievances from Project-Affected Communities

GUIDANCE FOR PROJECTS AND COMPANIES  
ON DESIGNING GRIEVANCE MECHANISMS



This 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 Australian Government's Environmental and Social Safeguard Policy and the Australian Aid 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 manage adverse impacts on people and communities, improve the outcomes of aid investments, and reduce the risk of project delays. The voicing of grievances is part of complex development processes, and, in fact, could be a source of concern. During planning and implementation, grievances are very likely to arise in program investments. Grievances can arise in investments involving displacement and re-settlement but are also common in investments where people are perceived to have an adverse impact on the environment or communities. The timing and amount of compensation for displacement or resettlement may be questioned. Some people may feel that they 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 can 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 safe and credible channel for seeking to resolve complaints, increasing the likelihood that their needs 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

**2. 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



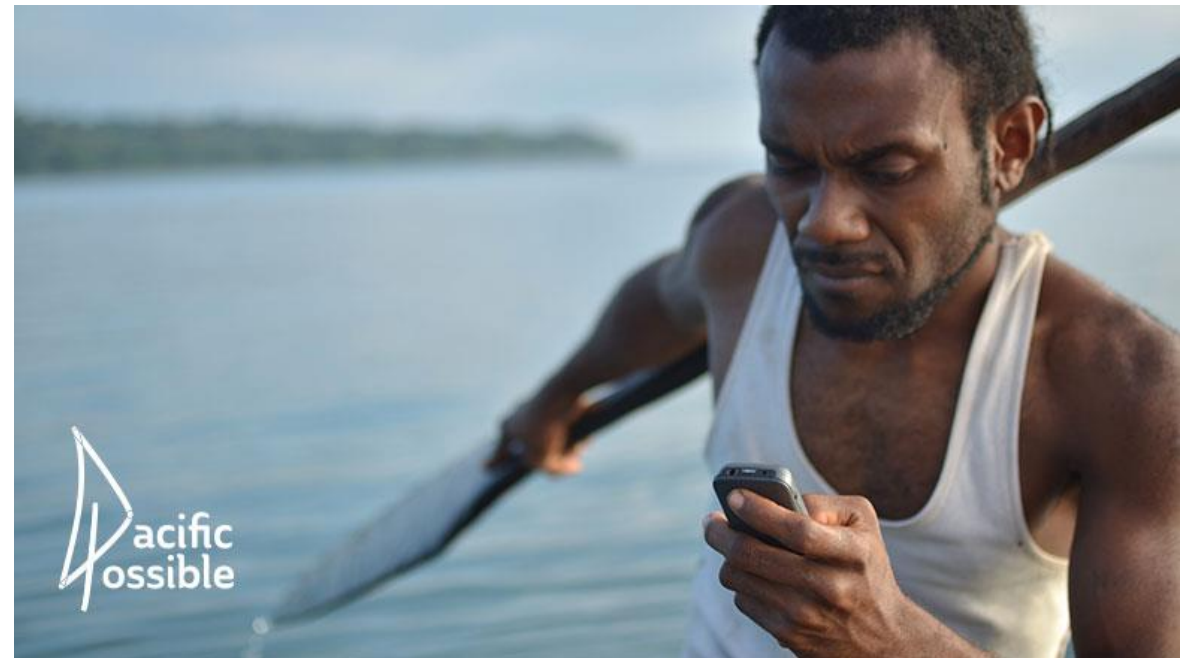
# What is a Project GRM?

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.

IS NOT a substitute for legal or administrative systems or other public or civic mechanisms,

# Purpose of Project GRMs

- 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.

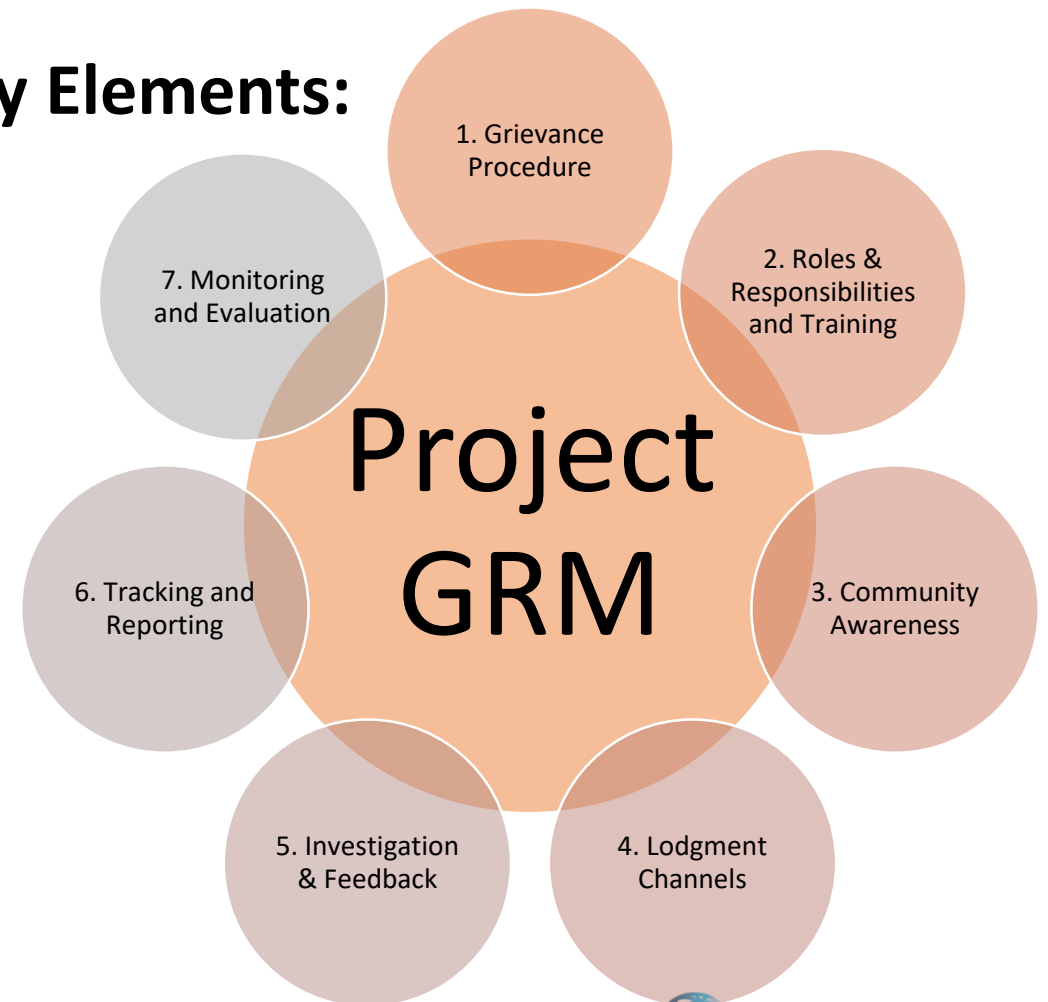
Questions?

# Developing a robust project GRM

## 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:

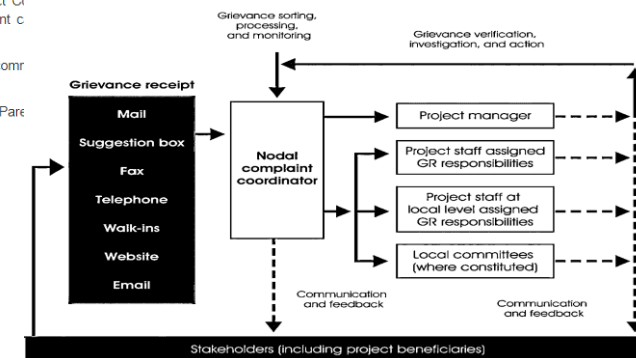
Stage 1: any person aggrieved by any aspect of the project can lodge an oral or written grievance directly to the Project Management Unit (PMU)\* or via a nominated local representative. The PMU will seek to resolve the complaint through an established grievance redress process. If the complaint cannot be resolved within 30 days of receipt, it advances to stage 2 of the grievance process.

Stage 2: if the aggrieved person is not satisfied with the outcome of initial stage consideration, the aggrieved person can refer the issue to the PREP Coordinator. If the complaint cannot be resolved within 7 days of receipt, it advances to stage 3 of the process.

Stage 3: if the aggrieved person is still dissatisfied with the stage 2 process, the Project Coordinator, MEIDECC CEO, Project Coordinator and the PMU Safeguards Specialist. If the complaint committee, it advances to stage 4 of the process.

Stage 4: if the aggrieved person is still dissatisfied following review by the grievance committee in accordance with national laws and procedures.

\* Feedback or complaints relating to school reconstruction activities can also be directed to the Pacific Ministry of Education and Technology's Emergency Response Unit.



# QUIZ

**3. The implementation of the project GRM is the sole responsibility of the project safeguards officer?**

- True
- False



# Developing a robust project GRM

## Roles and Responsibilities & Training

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



# QUIZ



**4. The best way to raise awareness of a project's GRM is through community consultations**

- True
- False

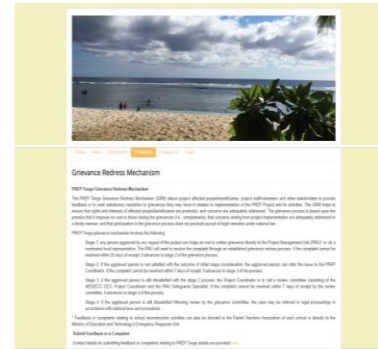




# Developing a robust project GRM

## 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

## Lodgment Channels

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



# QUIZ

**5. It's important to record all details of a project related grievance and ensure this information is recorded on the grievance registry and stored on the project shared-drive.**

- True
- False

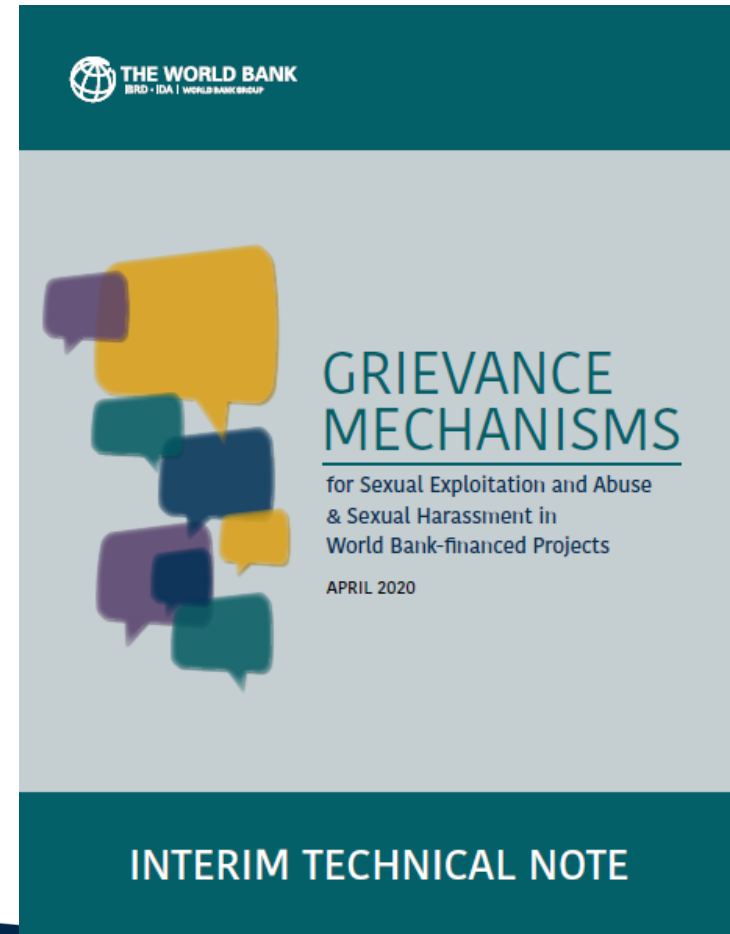


# Developing a robust project GRM

**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

## 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									
	<b>Name / Anonymous</b>	<b>Contact details</b>	<b>Gender M / F / Unkno wn</b>	<b>Date Received</b>	<b>Method: Phone/email/mai l/ complaints box</b>	<b>Issue Type: Request for Information Feedback Concern Grievance</b>	<b>Summary of Issue</b>	<b>Responsibility: contractor / PM / Safeguards /</b>	<b>Action Log Include Date and Action.</b>
2									



### Record of Complaints & Grievance



# Developing a robust project GRM

## 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 \_\_\_

# PANEL DISCUSSION



# GRM: Conditional Cash Transfer Program

## Skills and Employment for Tongans Project

- **Stakeholder group:** Families with school aged children
- **Risk:** Real/perceived inequity
- **Key features:**
  - PMU led
  - Inquiries + appeals + grievances
  - MIS System to record and track
  - Grievance resolution indicator

## Challenges/Opportunities

- MIS as register integration
- Managing high levels of info requests





# 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 3 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

- Utilizing traditional village mechanisms
- Operating across 30 wards; 5 provinces

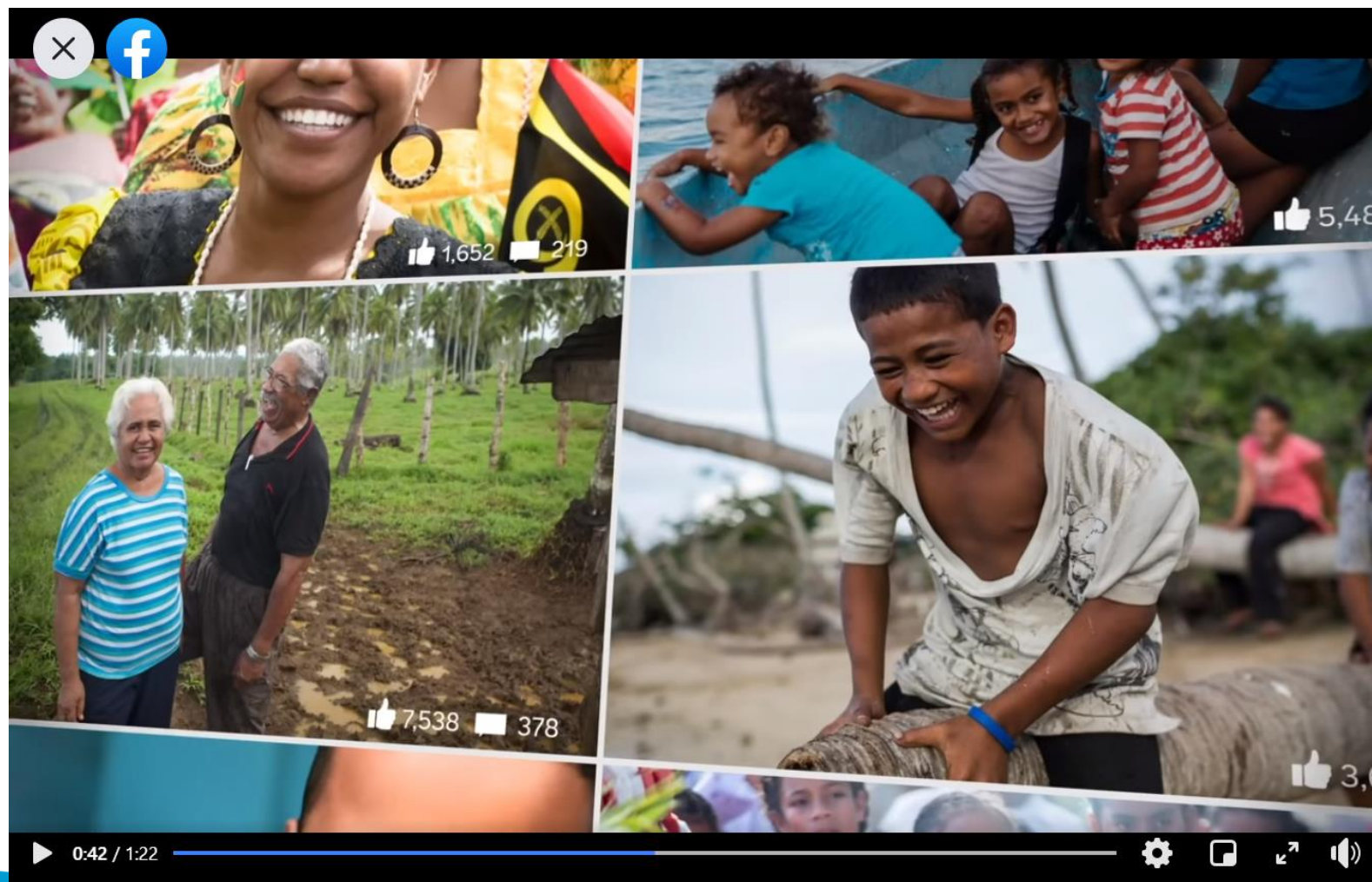


**Questions?**

# 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](#)

# Group Photo?



# Next Webinar:



## ESS 5 LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT (LAND OWNERSHIP)

2<sup>nd</sup> December, 2020

