

GRIEVANCE REDRESS MECHANISM



PRODUCED BY THE PROJECT COORDINATION UNIT

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Table of Contents

1.	INTRODUCTION	1
2.	SCOPE OF THE GRIEVANCE REDRESS MECHANISM	2
2.1	DVRP Roles and Responsibilities	3
2.2	Grievance Reporting Channels	4
2.3	Categories of Complaints	4
3.	THE GRIEVANCE MECHANISM PROCESS.....	5
3.1	Receive Grievance	5
3.2	Record	5
3.3	Screen.....	5
3.4	Acknowledge	6
3.5	Investigate	6
3.6	Actions and commitments.....	6
3.7	Follow up and Close Out	7
3.8	Escalation	7
3.9	Reporting	7
3.10	Records.....	8
APPENDIX 1	GRIEVANCE LODGEMENT FORM	10
APPENDIX 2	GRIEVANCE REGISTER	11

1. INTRODUCTION

The purpose of this document is to formalise the management of grievances of external stakeholders to minimise the environmental, health, safety and social risks resulting from the Disaster Vulnerability Reduction Project (DVRP). The grievance process, outlined in the document, provides an avenue for external stakeholders to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between internal stakeholders and external stakeholders. Table 1 provides definitions of key terms used throughout the grievance process.

Table 1: Grievance Mechanism Definitions

Term	Definition
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the project in a formal manner.
Grievance Mechanism	A formalised way to accept, assess, and resolve individual or community complaints concerning the performance or behaviour of the project, its contracted entities or employees. This includes adverse economic, environmental and social impacts.
Internal Stakeholders	Internal Stakeholders are those directly involved in the work of the project, such as the Project Coordinator, Project Team, Implementation Support Team, Ministry of Housing and Lands, the World Bank.
External Stakeholders	Individuals or community groups who are not directly linked to the project's implementation but can influence the activities of the project through various ways. This includes neighbours, NGOs, the government, political groups, local councils, and the surrounding communities.

2. SCOPE OF THE GRIEVANCE REDRESS MECHANISM

The Grievance Redress Mechanism applies to all external stakeholders during the life of the project.

For grievances filed, there will be a normal response time of 5-10 working days for each case starting from the date the grievance is officially received by safeguards specialist, however high-level cases may require up to 10 or more working days for a response.

The PCU shall meet and discuss, inter alia, grievance and resolutions to determine the level of the complaint (Level 1, Level 2, Level 3) noted in Table 2 under the screening section of this document. This process is led by the project Social Safeguards Specialist with support from the relevant team members including; Environment Safeguards Specialist, 1 IST Safeguards Adviser and Project Manager/Coordinator.

In particular for grievances classified as level 2 and 3 cases, the Social Safeguards Specialist will direct the matter to the Project Manager with the support of the Implementation Support Team (IST).

The internal team will meet regularly to work through the outstanding and difficult grievances and decide jointly on the actions required and communications to the complainant. If this group finds that they are not able to resolve the matter they can seek guidance from the relevant Permanent Secretary from specific Ministries.

If the grievance continues to be unresolved a grievance committee meeting will be initiated with the following participants; the complainant, a member of civil society or council, the relevant Permanent Secretary, the Project Coordinator, Safeguards Specialist and IST Safeguards Adviser.

2.1 DVRP Roles and Responsibilities

Role/ Position Title	Responsibility
<ul style="list-style-type: none"> • Environmental/Social Safeguards Specialist 	<ul style="list-style-type: none"> • Investigating the grievance and liaising with the external stakeholder/s. • Developing resolutions and actions to rectify any issues. • Follow up and track progress of grievance. • Document any interactions with external stakeholders. • Monitor the grievances and assign a safeguard specialist. • Makes sure the grievance mechanism procedure is being adhered to and followed correctly. • Maintains grievance register and monitor any correspondence • Raise internal awareness of the grievance mechanism among contractors, employees contracted firms and relevant external stakeholders. • Provide training to the Village Councils on the Grievance Redress Mechanism, to include use of the Grievance Forms.
<ul style="list-style-type: none"> • Project Coordinator • Implementation Support Team (IST)Safeguards Advisor • Internal experts e.g.: procurement, finance, valuations 	<ul style="list-style-type: none"> • Provide information and assistance in developing a response and close out of a grievance. • Developing resolutions and actions to rectify any issues.
<p>Kalinago Village Council</p>	<ul style="list-style-type: none"> • The councils should understand the procedure • Receive, record and forward to the DVRP PCU • Explain the GRM process to the community when necessary • Assist in monitoring the status of reported grievances following resolution, to ensure maintenance
<ul style="list-style-type: none"> • Contractors 	<ul style="list-style-type: none"> • Report grievance to the Environmental/Social Safeguard Specialist • Understand the process and can communicate to stakeholders when asked. • Explaining the mechanism to their employees and ensuring they all understand how to receive and report grievances

2.2 Grievance Reporting Channels

The PCU will communicate this procedure to its external and internal stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external stakeholders to vocalise their grievances formally include:

- **Email:** A community member can email any member of project staff to complain [at email address: pccrdvrp@dominica.gov.dm](mailto:pccrdvrp@dominica.gov.dm)
- **Telephone: 1 767 266 3139**
- Complainants can call the DVRP's Project Coordination Unit at:
 - Social Safeguards Specialist 266 3133
 - Environmental Specialist: 266 3133
 - Communication, Monitoring & Evaluation Specialist 266 3158
- Complainants can visit the Disaster Vulnerability Reduction Project's Project Coordination Unit at 38 Cork Street, Roseau (First Floor) and register their complaint directly to the:
 - Social Safeguards Specialist
 - Environmental Specialist
 - Communication, Monitoring and Evaluation Specialist

Project team and Contractors: The contracted firms should have their own grievance procedure in place that links to this GRM. However, the firms and their employers should be trained and briefed on this grievance procedure. If they receive grievances from a community member, they should either process them through their existing community grievance procedure or record and pass on their grievance to the PCU safeguard specialist.

All complaints or grievances received by the PIU will be registered and assigned to Social Safeguards Specialist/Environmental Safeguards Specialist for further action.

2.3 Categories of Complaints

The following general categories of complaints/grievances will be considered to be within the scope of the project's GRM:

- **Communications** – information or consultation related issues
- **Project and process** – any grievance related to the project description, process e.g.: (eligibility) design or scope of the project.
- **Project performance** – a grievance related to the project performance, failure to implement as promised commitments of the project.
- **Legal** – grievance accusing the project or personal of breaking the law or government regulations
- **Health safety or environment or community (HSEC)**– complaints related to any of the safeguard standards

3. THE GRIEVANCE MECHANISM PROCESS

Figures 1 and 2 describe and illustrate the steps that will be taken to resolve grievances.

Figure 1: Grievance Mechanism



3.1 Receive Grievance

There are various methods of receiving grievances from the public; in person verbally, official letter, email, by phone, during meetings and through the village councils.

The Environmental/Social Safeguards Specialist receives all grievances and ensure that the relevant information is provided in order to record, assess and respond to the grievance. The safeguard specialist can use the grievance form as a template for ensuring all needed information has been gathered.

3.2 Record

The safeguard specialist will record the grievance in the grievance log. In addition, the safeguard specialist will be responsible for filing any official grievances correspondence in the grievance filing system. (see Appendix 2) The Grievance Forms (Appendix 1) will be completed by the complainant or the Social/Environmental Safeguards Specialist.

3.3 Screen

The safeguard specialist will do the initial assessment of whether the grievance is a Level 1,2 ,3. If they suspect it may be a level 2 or 3, they will need to include the relevant parties into further analysis of the grievance. Grievances will be screened depending on the level of severity in order to determine the next steps of action required to resolve the complaint or if further investigation is required. See Table 2 below, categorising the different levels:

Table 2: Grievance Category

Category	Description	Internal response	Responsibility
Level 1	When an answer can be provided immediately and/or DVRP is already working on a resolution.	Respond immediately to complainant. Record and report as part of overall reporting process. Does not require internal consultation	Social Safeguards Specialist / Environmental Safeguards Specialist Stakeholder Specialist
Level 2	One off grievance that requires considered response and actions/commitments to resolve complaint.	Needs input from IST and other internal team members and specialists.	Supervisor level or above
Level 3	Repeated, extensive and high-profile grievances that may jeopardise the reputation of DVRP	Needs input from CREAD and relevant Ministries permanent secretaries.	Executive level

3.4 Acknowledge

A grievance will be acknowledged, by the safeguard specialist, within two working days of a grievance being submitted. Communication will be made either verbally or in written form (stakeholders will outline their preferred method of contact as indicated by complainant).

The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

3.5 Investigate

The safeguard specialist is responsible for investigating the grievance within five working days. The investigation may require the safeguard specialist to make site visits, consult employees, contact external stakeholders and complete other activities. Meetings, discussions and activities all need to be recorded and documented during the investigation. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance. Where possible and applicable, photographs should be taken to record sites, activities or other relevant information/data and included in reports.

3.6 Actions and commitments

Following the investigation, the safeguard specialist will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The safeguard specialist is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the safeguard specialist feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

3.7 Follow up and Close Out

The safeguard specialist will contact the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder, the safeguard specialist will verify that the outcome was satisfied and also gather any feedback on the grievance process. Minutes of the meeting will be recorded and saved in the grievance filing system.

If required the safeguard specialist may need to follow up with the external stakeholder on numerous occasions to confirm all parties are satisfied.

3.8 Escalation

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the safeguard specialist needs to escalate the matter. This grievance should have IST escalate the situation to executive management team as unresolved. The executive team will review the grievance and all documentation gathered throughout the investigation and determine whether further actions are required to resolve the grievance.

The Project is fully committed to resolving an external stakeholder's grievance so if the PCU is unable to resolve a complaint or a stakeholder is unhappy with the outcome, the PCU may seek advice from other independent parties. This can include the Permanent Secretary of the relevant Ministry.

If internal discussion with senior advisors does not come to a resolution with the complainant then a Grievance Committee can be called with the following parties: the complainant, a member of any legitimate civil society body as nominated by the complainant¹, the Project Co-ordinator/Manager, IST and Project Safeguard Specialist. This committee will come together to discuss the situation and seek to find a resolution. The Project Co-ordinator will chair the meeting but will not have the final say on the outcome of the meeting.

If this continues to remain unresolved the project will inform CREAD and seek their advice.

If this remains unresolved the complainant will continue to have the opportunity to take up the grievance with the Attorney General's office.

3.9 Reporting

The Project Management Team will receive quarterly updates on overall stakeholder grievances. Information outlining the number of grievances, time to resolution and outcomes of grievances will be communicated. The PCU will use a reporting template that outlines the relevant information. The Grievance procedure will be revisited every two years (or when required) to continually improve its stakeholder engagement and effectiveness.

The World Bank will be informed of all Level 3 complaints and if there is a complaint which is considered to pose a serious risk to the community (or a community member) or the project.

The overall grievance reports can be shared at key intervals during community consultation to demonstrate transparency. ²

¹ This could be; a religious organisation, local council, a Not for Profit organisation or community association that the complainant trusts.

² With no personal information that would breach the privacy of a complainant.

3.10 Records

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed in a password protected, project grievance filing system to ensure privacy and confidentiality is maintained for all parties involved.

All names or contact details of complainants will be held confidential and will not be released to an external party without the complainant's permission.

Commonwealth of Dominica DVRP - Grievance Redress Mechanism

Figure 2: Grievance Mechanism Descriptive Flowchart



APPENDIX 1

GRIEVANCE LODGEMENT FORM

Grievance Lodgement Form

Name:		Please do not use my name when talking about this concern in public. <input type="checkbox"/>	
Company: (if applicable)			
Date:		Time:	
Preferred Contact Method:	<input type="checkbox"/> Telephone <input type="checkbox"/> Email <input type="checkbox"/> Mail Please provide contact details:		
Supporting Documents / Photos Attached?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, list them:		

Please tick the general category of your grievance	Awareness <input type="checkbox"/> Eligibility <input type="checkbox"/> Payment Delays <input type="checkbox"/> Fiduciary <input type="checkbox"/> Missing Documentation <input type="checkbox"/> Compliance and Inspection <input type="checkbox"/> Construction <input type="checkbox"/> Community <input type="checkbox"/>
Please provide details of your grievance (State how often you have experienced this issue e.g. Once, 2 to 5 times, all the time etc.)	
Additional Information	
Stakeholder Reference:	NGO <input type="checkbox"/> Neighbour <input type="checkbox"/> Indigenous <input type="checkbox"/> Beneficiary <input type="checkbox"/> Local Government <input type="checkbox"/> Contractor <input type="checkbox"/> Consultant <input type="checkbox"/> Other <input type="checkbox"/> _____

Claimant Signature:

Date:

Stakeholder Contact/Specialist Signature

Date:

APPENDIX 2

Office Use only

GRIEVANCE REGISTER

Name of Complainant	Date Received	Grievance Description	Grievance Level (1, 2, 3)	Requires Further Intervention	Action(s) to be taken by DVRP	Resolution 'Accepted' or 'Not Accepted'.

APPENDIX 3:

Grievance reporting template

Date

To: (e.g.: PS, WB, Complainant)

Summary of overall new and outstanding grievances (in this reporting quarter/*insert time period e.g.: Q42019*):

Total number of Grievances	
Grievances not actioned	
Grievances in progress	
Grievances closed	

Levels of grievances in this reporting quarter

Number of Level 1	
Number of Level 2	
Number of Level 3	

Reporting on level 3 grievances

- 1. Number/title of grievance:**
 - 2. Date received**
 - 3. Short description of grievance**
 - 4. Summary of key milestones/actions taken to date**
 - 5. Current situation; including next steps or description of final resolution**
 - 6. Key obstacles (if any) in finding a resolution**
 - 7. Key risks (if any) to impacting project goals**
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