



MALDIVES ENHANCING EMPLOYABILITY AND RESILIANCE OF YOUTH
PROJECT (MEERY)

Operational Guidelines - Grievance Redress Mechanism (GRM)

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THE MINISTRY OF ECONOMIC DEVELOPMENT
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1. Introduction

Transparency and accountability are core components of the Maldives Enhancing Employability and Resilience of Youth (MEERY) Project. To achieve this objective, the project has established a Grievance Redress Mechanism (GRM). The goal of the GRM is to strengthen accountability to beneficiaries and provide channels for project stakeholders to provide feedback on project activities. It provides a mechanism that allows for the identification and resolution of issues affecting the project, including safeguard related complaints, misuse of funds, abuse of power or unfair treatments. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as important feedback and learning mechanism that can help increase the impact of the project.

The GRM established under the MEERY Project is accessible to the public. The mechanism focuses not only receiving and recording complaints, but also on how complaints are resolved. The GRM is supported by information sessions and trainings. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this manual.

2. Definition of GRM

For the purposes of this operations manual, a grievance redress mechanism (GRM) is a process for receiving, evaluating, and addressing project-related complaints from affected communities at the level of the project.

The terms 'grievance' and 'complaint' are used interchangeably.

3. GRM Management

3.1 Scope

The MEERY Project includes a grievance redress mechanism that is available for project stakeholders to submit questions, comments, complaints and/or suggestions, or provide any form of feedback on all project-funded activities

3.2 GRM Users

Project beneficiaries, project affected people (i.e., those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry. The GRM is used for the purpose of making complaints or providing suggestions and feedback.

3.3 GRM Owners

The GRM for the MEERY Project is owned and managed jointly by the Project Management Units (PMUs) based in Ministry of Higher Education (MoHE) and Ministry of Economic Development (MoED). The grievances lodged related to each implementing agency's activities is managed by their respective PMUs.

All communication channels such as the website and social media platforms of the project must be accessible to designated staff of both PMUs. All grievances are managed and addressed as per the Grievance Redressal Procedure.

3.4 GRM Eligibility Criteria

The complaints and grievances are eligible to be reviewed if below conditions are met:

1. The complaint relates to MEERY project (components, activities) that is under preparation, active, or has been closed for less than 15 months.
2. The complaint is submitted by individuals or communities affected by MEERY project (components, activities), or by their authorized representative; and
3. The complainant(s) allege that they have been or will be affected by the MEERY project (components, activities).

4. Grievances/complaints related to the design or suitability of the MEERY activities and policies.

There is no charge for making a complaint or conveying comments and/or suggestions.

The following will not be handled under the Grievance Redress Mechanism:

- Grievances/complaints not related to the MEERY project.
- Grievances/complaints related to the government policies and procedures.

For grievances that do not meet the eligibility criteria, the complainant will be informed about it and the reason for not meeting the criteria.

4. Procedures

4.1 Complaint Channels

The project establishes the following channels through which citizens/beneficiaries can make complaints regarding project funded activities.

- a. Via email: feedback.pmu@mohe.gov.mv
- b. Via the MEERY project website: <https://meeryproject.mohe.gov.mv/>
- c. Via mail/letter sent to:
 - Project Management Unit (PMU)
 - Ministry of Higher Education
 - Fen Building, 4th Floor, Ameenee Magu,
 - Male', Republic of Maldives
- d. Via feedback forms from project related meetings, seminars, workshops, trainings, and events.
- e. Via feedback boxes at subproject sites.
- f. Direct messages through social media platforms
 - i. Facebook
 - ii. Twitter
 - iii. Instagram
 - iv. Viber (+960 9139292)

4.2 Complaint Information

- a. Identify the project subject of the complaint (Subject of a grievance) **(Mandatory)**
- b. Clearly state the project's adverse impact(s) (Substance of a grievance) **(Mandatory)**
- c. Identify the individual(s) submitting the complaint **(Optional)**
- d. Specify if the complaint is submitted by a representative of the person(s) or community affected by the project **(Optional)**
- e. if the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative **(Optional)**

Supporting evidence is not necessary but may be helpful in reviewing and resolving the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved.

4.3 Confidentiality

All inquiries will be kept confidential and aggrieved parties will be able to send complaints anonymously. To reduce and avoid any possible conflict(s) of interest, multiple channels are established to submit complaints and it can be submitted anonymously.

The GRM will not disclose any personal data that may reveal the identity of complainants without their consent.

4.4 Collection and Sorting of complaints

1. Upon receipt of a grievance, the **Social Safeguard Specialist** from the MoHE PMU is responsible to log the complaint in shared 'Grievance Registry' and sort the grievance to identify the responsible Ministry, and subsequently notify the identified Ministry via email within 2 working days.
2. Once emailed, the Grievance Redressal Procedure is initiated.
3. Once a grievance has been processed and handed over to the responsible Ministry, the **Social Safeguard Specialist** of the responsible Ministry, under the guidance and instructions from Project Director and Project Manager, will receive, sort, classify and investigate all complaints with the relevant committees.

Category	Classification
1	Grievances regarding violations of regulations
	1.1 Violation of project policies and guidelines
	1.2 Violation of World Bank regulations
	1.3 Violation of national laws and regulations
	1.3 Contract violations by project beneficiaries
	1.4 Contract of violations by project staff
	1.5 Contract of violations by project partners
2	Grievances regarding project finance
	2.1 Misuse of project funds
	2.2 Lack of transparency
	2.3 Fraudulence in grant dispersal
	2.4 Misuse of grant funds by recipients
	2.5 Other financial management concerns
3	Grievances regarding procurement
	3.1 Procurement of consultants
	3.2 Procurement of non-consultancies
	3.3 Procurement of goods
	3.4 Procurement of works
4	Grievances regarding abuse of power
	4.1 Abuse of power by project officials
	4.2 Abuse of power by government officials
	4.3 Abuse of power by a third party
5	Environmental grievances
	5.1 Construction level impacts at rehabilitation/construction sites
	5.2 Inadequacy of sanitation facilities and water supply
	5.3 Waste generation
	5.4 Resource extraction
	5.5 Transport and labor camps
	5.6 Air quality
6	Social grievances
	6.1 Worker safety
	6.2 Community safety
	6.3 Noise
	6.4 Enrollment rates
	6.5 Youth employment rates
	6.6 Female participation

7	Feedback
	7.1 Suggestions
	7.2 Appreciations
	7.3 Requests

4.5 Recording and logging

Once the complaint has been classified, the **Social Safeguard Specialist** of the respective PMU logs the details regarding the complaint into the shared 'Grievance Registry'.

Once a complaint has been logged and sorted in the shared 'Grievance Registry', the **Social Safeguard Specialist** shall determine the following:

- The persons responsible for the investigation of the complaint.
- The timeframe within which the complaint should be resolved.
- The agreed course of action (e.g., investigation, reply not requiring investigation, referral to Grievance Redress Committee (GRC), etc.).

The investigation process is determined based on the nature and gravity of the complaint:

- For Level 1 grievance, the investigation will be conducted by designated staff within 15 (fifteen) working days.
- For Level 2 grievance, the investigation will be conducted by the GRC within 28 (twenty-eight) working days.

When determining who will be investigating the grievance, the **Social Safeguard Specialist** for relevant PMUs in MoHE and MoED will ensure that there is no conflict of interest, i.e., all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the **Social Safeguard Specialist** for managing the GRM records and enters this data into the Grievance Registry. The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications.

4.6 Notification to the complainant

The **Social Safeguard Specialist** of relevant PMU will communicate the timeframe and course of action to the grievant by email within 5 (five) working days of receipt of the grievance.

4.7 Investigation

The **Social Safeguard Specialist** of relevant PMU is responsible to investigate the complaint and gather facts to generate a clear picture of the circumstances surrounding the grievance. Modes of verification normally includes site visits, review of documents, a meeting with the complainant (if known and willing to engage), and a meeting with those who can resolve the issue (including members from the implementing agencies and Ministries). For complex grievances, the investigation is referred to the Grievance Redress Committee.

The results of the verification and the proposed response to the complainant is presented for consideration to the Project Manager and Project Director.

Once the decision has been made on the course of action and on the response to be provided to the complainant, the **Social Safeguard Specialist** identifies the actions to be taken along with the details of the investigation and the findings and enters it into the Grievance Register.

The **Social Safeguard Specialist** of relevant PMU communicates to the complainant the proposed action(s) and how to appeal the action(s) decided in the case via letter or email.

The **Social Safeguard Specialist** will request feedback from the complainant as to whether she/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the response taken.

4.8 Possibility to Appeal

In the event the complainant is not satisfied with the response, the complainant is allowed to appeal against the decision within 7 working days.

Upon receiving an appeal, discussions will be held in group or individually to further clarify the positions at stake. Senior management will take part in these meetings and a final decision on the action(s) will be made.

The PMU will form a separate grievance committee, on an ad hoc basis that will hear appeals. The grievance committee shall be comprised of the technical committee members and the PMU (Persons from the relevant Ministries will be invited to the committee based on the nature of the complaint).

The terms of the grievance committee will be agreed prior to its formation.

4.9 Publication

Once the case is resolved, the complaint and the actions taken is disclosed on the project website. The identity of the complainant remains confidential.

5. Awareness-building

5.1 Information provided in an accessible format

Information about the grievance handling system will be distributed to all beneficiaries and project affected people through regular information channels used by the project, including initiating meetings at the start of the project, visits to the islands, meetings held with the locals in the pilot areas, trainings sessions and workshops, brochures and the project website.

The PMU will provide information on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when, and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

5.2 Proactive advertisement/regular public information campaigns

Annual information sessions will be designed by the Social Safeguard Specialist to encourage the use of the GRM. The **Social Safeguard Specialist** will publish all relevant information on the project website, provide information to the public via meetings and supervision visits to the pilot areas.

The campaigns should include information on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when, and how), the investigation process, the timeframe(s) for responding to the complainant, principle of confidentiality and the right to make anonymous complaints.

6. Staffing and capacity-building

6.1 *Roles and responsibilities of Social Safeguard Specialist*

As the person responsible for the management of the GRM system, **Social Safeguard Specialist** (with support from PMU) will be responsible to carry out following. These will be documented in the first Quarterly Progress Report and kept updated.

- Overall management of the GRM system
- Collection of complaints
- Recording/logging of complaints
- Sending notification to the complainant
- Sorting/categorization of complaints
- Investigation
- Decision-making based on the investigation results
- Processing appeals
- Publishing responses to complaints
- Organization and implementation of information materials and awareness campaigns
- Budgeting of the GRM.
- Reporting and feedback on GRM results

6.2 *Capacity-building*

Training for all relevant staff and relevant stakeholders will be held annually, or as otherwise agreed. New staff will receive training as a regular part of the onboarding process. The training will include all aspects of the GRM set out in this chapter. All trainings should include information on the GRM principles and procedures. The training will have an emphasis on accountability to the complainant. A key focus at the outset will be shifting from informal complaint resolution to the logging of all complaints/feedback into this system.

Dedicated trainings should be provided to staff directly engaged with beneficiaries, those handling the system, and those involved in the management and oversight of the system.

7. Transparency, monitoring, and reporting

7.1 Transparency

Policies, procedures, and regular updates on the GRM system, the complaints made and resolved, will be available online on the project website.

7.2 Regular internal monitoring and reporting

The Project Manager will assess the functioning of the GRM and undertake spot checks on all the process. Monitoring & Evaluation Specialist will do the following:

- Ensure accurate entry of GRM data into the management information system or any other system.
- Produce compiled reports to the format agreed with the Project Manager.
- Provide a monthly/quarterly snapshot of GRM results, including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track complaints not yet resolved and suggest any needed remedial action.

7.3 Reporting in quarterly and annual progress reports submitted to the Bank

Quarterly and annual progress reports shall include a GRM section which provide updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting, etc.).
- Quantitative data on the number of complaints received, the number of complaints relevant, and the number of complaints resolved.
- Qualitative data on the type of complaints and answers provided, and issues that are unresolved.

- Time taken to resolve complaints.
- Channels through which the grievances were received
- Number of grievances resolved at the lowest level, raised to higher levels.
- Satisfaction of the complainant with the action taken.
- Any procedure related issues.
- Factors that may affect the use of the GRM/beneficiary feedback system.
- Any corrective measures adopted.

The above reporting requirements for Quarterly Progress Reports and Annual Progress Reports will also be reported in Bank supervision mission Aide-Memoires.

7.4 Oversight and review

The status of the development of the GRM, the levels of use by beneficiaries/ citizens, the challenges of implementation, etc. will be discussed in semi-annual/annual portfolio meetings. The PMU will discuss with the Bank during implementation support missions any corrective measures that may be needed.

An independent review/audit of the GRM will be conducted prior to the mid-term review to assess the effectiveness and use of the mechanism and recommend and introduce improvements as necessary.

8. Budgeting

An earmarked budget for the GRM will be included in the budgets approved by the Bank. The budget will include the costs for the following GRM related activities as described above.

Complaints Handling:

- Establishment and management of the channels selected for making complaints
- Management of complaints collection
- Complaints recording and categorization
- Complaint investigation
- Communication with complainant
- The appeals process
- Publication of responses to complaints (if agreed)

Supporting costs:

- Capacity-building of the Staff assigned to the GRM.
- Management Information System
- Independent review (if needed)