Grievance Redress Mechanism

Maldives COVID-19 Emergency Response and Health Systems Preparedness Project

May 2020
I. Introduction

Transparency and accountability are core components of the Maldives Covid-19 Emergency Response and Health Preparedness Project. To this end, the project has established a Grievance Redress Mechanism (GRM). The goal of the GRM is to ensure timely, operational, and efficient resolution of complaints and grievances that satisfies all parties involved. It provides a transparent and credible mechanism for fair, effective, and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality and transparency in handling complaints and grievances;
- Avoids the need to resort to judicial proceedings (at least initially);

II. 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.
III. Scope and use of GRM

Scope
The Grievance Redressal Mechanism will be available for project stakeholders to submit questions, comments, complaints and/or suggestions, or provide any form of feedback on all project-funded activities.

Who can use the GRM?
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 can be used for the purpose of making complaints or providing suggestions and feedback.

Who is managing the GRM?
With regards to the Maldives COVID-19 Emergency Response and Health Systems Preparedness Project, grievances relating to the project will be handled at the Administration Division level of the Ministry of Health.

All grievances will be monitored by the Project Management Unit (PMU), more specifically, by the Social Specialist along with the Monitoring & Evaluation Specialist with direction from the Project Coordinator and the Project Director.

When can a complaint be made?
Complaints can be conveyed any time throughout the implementation period of the Project.

There is no charge for making complaints, comments and/or suggestions.
IV. Grievance Redress Procedures

Channels to make complaints

The project will establish the following channels through which citizens/beneficiaries can make complaints regarding project funded activities:

a. Via email: feedback.pmu@health.gov.mv
b. Via the project website:

c. Via mail/letter sent to:
	Project Management Unit (PMU), Ministry of Health, H. Roshani Building, Sosun Magu, Male’, Republic of Maldives
d. Via the 24/7 hotline for COVID-related issues (handled by MoH): 1676
e. Via feedback forms available at HCFs, quarantine centers, meetings, workshops and trainings.

Grievances may be submitted anonymously.

Confidentiality and conflict of interest

Confidentiality of the complainant will be ensured in all instances. For this reason and to avoid any possible conflicts of interest, multiple channels to make complaints have been established.
Collection/Sorting of complaints

The appointed focal point will receive, sort and investigate all complaints with the relevant committees.

1. Grievance regarding access
   1.1. Limitations in access to COVID-19 related information
   1.2. Limitations in access to receive adequate medical care/attention

2. Grievances regarding disruptions at project sites
   2.1. Disruptions in the vicinity of quarantine facilities
   2.2. Disruptions in the vicinity of isolation units

3. Grievances regarding violations of regulations
   3.1. Violation of project policies and guidelines
   3.2. Violation of World Bank and Asian Infrastructure Investment Bank (AIIB) regulations
   3.3. Violation of national laws and regulations
   3.4. Contract violations by project partners
   3.5. Contract of violations by project staff

4. Grievances regarding project finance
   4.1. Misuse of project funds
   4.2. Lack of transparency

5. Environmental grievances
   5.3. Waste generation and disposal
   5.4. Resource extraction
   5.5. Transport and labor camps

6. Social grievances
   6.1. Worker safety
   6.2. Community safety

7. Feedback
   7.1. Suggestions
   7.2. Appreciation
**Recording/logging**

Once the complaint has been categorized, the social specialist will log the details regarding the complaint into the tracking system.

Once a complaint has been logged and sorted, the following must be determined:

- 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, etc.

The investigation process is determined based on the nature, tier, and gravity of the complaint.

The grievance mechanism is divided into 4 tiers. At tier 1 and 2, the investigation will be led by the head of the facility. At tier 3, grievances will be submitted to a 5-member committee. This committee will comprise of the Social Specialist, a representative from the Human Resource Division, a representative from the Quality Assurance Division, a representative from the Accounts and Finance Division and a representative from the Legal Affairs Unit. If the resolution provided is not acceptable, the complainant may seek assistance from the judiciary (tier 4).

When determining who will be the investigating the grievance, the Social Specialist must 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 person responsible for managing the GRM records and enters this data into the grievance record sheet. The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications.
Notification to the complaint

The Senior Social Safeguard Officer will communicate the timeframe and course of action to the grievant by email within 3 (three) working days of receipt of the grievance.

Investigation

The Social Specialist will investigate the complaint and gather facts in order to generate a clear picture of the circumstances surrounding the grievance. Modes of verification normally includes site visits, review of documents, 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).

The results of the verification and the proposed response to the complainant will be presented for consideration to the Project Coordinator 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 Specialist identifies the actions to be taken along with the details of the investigation and the findings, and enters it into the grievance record sheet.

Response to complaint

The Social Specialist will communicate to the complainant the proposed action(s) and how to appeal the action(s) decided in the initial case via letter or email within 7-14 days.

The Social 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.
Publication

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

V. Awareness building

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.

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.

Proactive advertisement/regular public information campaigns

Annual information sessions will be designed by the Social Specialist to encourage the use of the GRM. The relevant information will be published on the project website, and information must be provided to the public via meetings, visits, etc.
VI. Staff awareness

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.

VII. Transparency, monitoring and reporting

Transparency

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

The Project Coordinator 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 Coordinator.
- 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.

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.
- 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.
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.