

I. GRIEVANCES REDRESS MECHANISM (GRM)

A. Introduction

13. Grievance Redressal Mechanism (GRM) is designed to ensure sustainability, transparency, and involvement of stakeholder throughout the implementation of the project. This would generate significant level of feedback on areas to improve as the project progress during both construction as well as operation phase.

14. This GRM is designed to fulfil the requirement of the ADB SPS. This GRM is designed based on the principles of transparency, predictability, rights compatibility, accessibility, and engagement of stakeholders.

A. Scope and Objective of GRM

15. This GRM is aimed to record, monitor, and resolve grievances/complaints and accommodate where possible any request and suggestions proposed by the project affected parties. The scope of this GRM is to redress any grievances/complaints regarding the environment and social safeguards. Any grievance/complaints which may arise in the project area however not due to a direct or indirect intervention of a project activities will not be addressed under the GRM. The GRM will be implemented during the construction and operations phase of the project.

B. Grievance Resolution Process

16. The GRM built on four stages. The complaint will be followed in two tiers. Figure 16 shows the grievance resolution process.

C. Stages of GRM

17. The GRM comprises of four stages. GRM will also undertake in two tiers, first tier will be at contractor level and second tier at MOH level. Each tier will have different actors for decision making process.

18. **Stage 1: Received the compliant:** This stage involves recording of the complaint that is received on the project. The complaints may range from “issue or complaint’ to an enquiry or suggestions for further improvements. The complaints, enquires or suggestions is also registered at the registry and a case is to be created. At the end of this stage an acknowledgement of the receipt of complaints, enquires or suggestions is issued to the aggrieved party or individual with a case number.

19. **Stage 2: Assessing the Compliant:** At the second stage, the complaint is screened. Regardless of the nature of the complaint it would be categorized as either environmental or social issues. The criteria for determination of environmental issues are noise, pollution, dust, discharge of pollutants, health and safety or other parameters as determined by ESS Consultant of the project. The environmental and social safeguards related complaints/enquires/suggestions will be

taken forward in this GRM. The non-safeguard related issues will be sent to contractor for their action. The outcome of that action will be informed by them accordingly.

20. **Stage 3: Investigation the Complaint:** This stage involves collection of information about the complaints/enquires/suggestions, assessment of the information provided, and verification of the data provided with field investigation (if and where necessary). At this stage the First and Second tier of GRM will operate. After a report prepared by the contractor ESS focal point, the report and its recommendation is sent to either the Grievance Redressal Committee at contractor level (GRC-Contractor) or Grievance Redressal Committee at MOH level (GRC-MOH). Based on the discussion, a decision would be made and agreed by consensus. If corrective actions measures are needed the corrective measures will be informed to the site manager or contractor for their due actions.

21. **Stage 4: Resolving the complaint:** At the end of stage 3 irrespective of the tier the complaint underwent, the aggrieved party or individual will be informed on the outcome and information on the corrective measures will be also communicated if relevant. After such communication the case would be closed, and status of the cases would be updated in the registry.

D. Tier 1

22. To lodge a formal complaint under Tier I, compliant form should be submitted (see Appendix 4). These forms can be filed anonymously. Upon submission of the request, a formal acknowledgement from the Contractor shall be provided to the party or individual. If the party or individual want to submit in-person forms shall be available at the site. Any assistance such as filling the form if requested by the aggrieved person, should be guided by the admin office at the site. An acknowledgment receipt then should be signed, sealed, and handed with case number.

23. The admin office at the site, shall keep the registry up to date with cases number and status of the complaint. The formal complaint shall be then screened for environmental or social safeguard issues, based on the criteria's mentioned above. After the screening of the issue, the contractor after consulting with PMU shall prepare an investigation report, which is to be submitted before GRC-contractor. Table 26, shows the role and responsibility of the GRC-contractor.

24. Under Tier I, in 10 working days the outcome of the complaint must be informed to the aggrieved party or individual. The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 5 working days. If no acknowledgement is submitted from the aggrieved party within this period, then the decision will be considered as accepted. If a complaint requires more time to address, this requirement must be communicated to the aggrieved party in writing and the aggrieved party must consent and sign-off the request for the extension to take effect. An extension can be made to an additional 15 working days.

Table 1: Roles and Responsibilities of the GRC-Contractor

Nodal Person	GRC Membership	Roles and Responsibility
GRM focal point from Contractor	Project Manager of Contractor (<i>Chairperson</i>) Site Engineer Representative from HDC NGO Representative PMU ESS focal point	Review the recommendation provided by PMU on the inquiry submitted Identify policy implication associated with the inquiry inquired Provide guidance on the inquire through agreement of the outcome to be informed to aggrieved party or individual

E. Tier Two

25. Tier II can be applied by any party or individual or if the grievance cannot be resolved through Tier 1 to the satisfaction of the aggrieved party or if the issue is outside the jurisdiction of the Contractor, an aggrieved party may submit a complaint on the Tier II Complaint form. If the complaint is made due to unsatisfactorily response at Tier I, the application form and the outcome provided should be submitted. Like Tier I, upon submission of the request, a formal acknowledgement from the MOH shall be provided to the party or individual. If the party or individual want to submit in-person forms shall be available at the MOH. Any assistance such as filling the form if requested by the aggrieved person, should be guided by MOH. An acknowledgment receipt then should be signed, sealed, and handed with case number.

26. MOH will screen the grievance complaint in consultation with the PMU in accordance to the criteria for screening mentioned above. If it is unrelated, the aggrieved party must be notified in writing and the way forward must be outlined to them including the necessary government institutions to follow up.

27. After the screening of the issue, MOH after consulting with PMU shall prepare an investigation report, which is to be submitted before GRC-MOH. Table 27 shows the role and responsibility of the GRC-MOH.

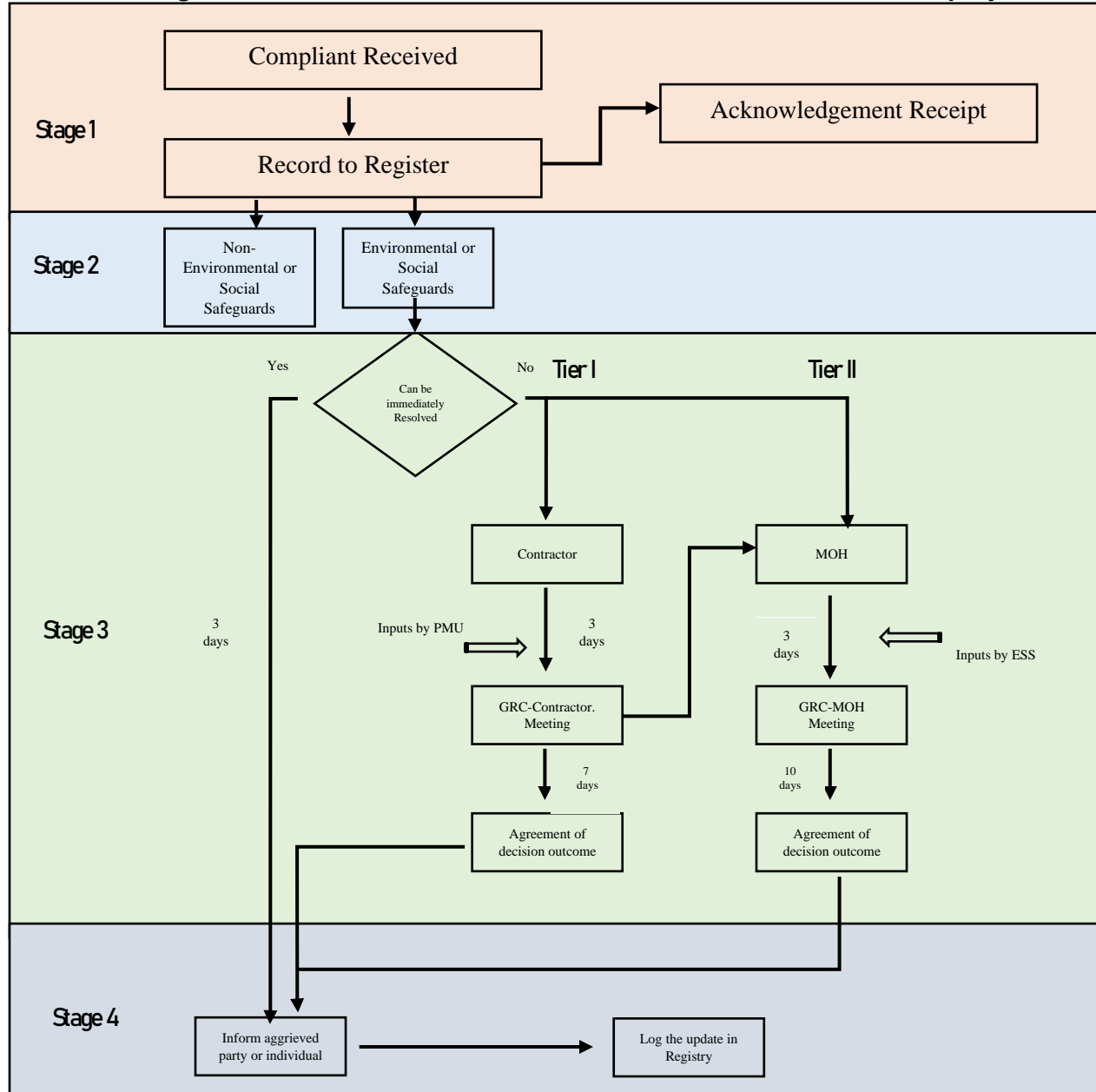
28. Under Tier II, in 15 working days the outcome of the complaint must be informed to the aggrieved party or individual. The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 5 working days. If no acknowledgement is submitted from the aggrieved party within this period, then the decision will be considered as accepted. If a complaint requires more time to address, this requirement must be communicated to the aggrieved party in writing and the aggrieved party must consent and sign-off the request for the extension to take effect. An extension can be made to an additional 15 working days.

Table 2: Role and Responsibilities of GRC-MOH

Nodal Person	GRC-MOH Membership	Roles and Responsibility
GRM focal point from MOH	Representative for MOH(<i>Chairperson</i>) Project Manager of Contractor NGO Representative PMU ESS focal point	Review the recommendation provided by ESS on the inquiry submitted Identify policy implication associated with the inquiry inquired Provide guidance on the inquire through agreement of the outcome to be informed to aggrieved party or individual

29. Where an affected person is not satisfied with the outcomes of all the levels of the project GRM, the affected person should make good faith efforts to resolve issues working with the South Asia Regional Department. As a last resort, the affected person can access ADB's Accountability Mechanism (ADB's Office of Special Project Facility or Office of Compliance Review). The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM

Figure 1: Grievance Redress Mechanism for the Maldives APVAX project



F. Grievance Registry

30. A grievance registry will be developed under this project. The following Table 28 include the format of the grievance registry.

Table 3: The format for the grievance registry

[illegible]

G. GRM During Operational Phase

31. During operations phase, the GRM will continue to operate through the MOH. The MOH shall ensure:

- i. GRM as described above shall continue to be operationalized
- ii. A GRM focal person within MOH will be assigned for environmental and social grievances reporting. This is particularly important during the initial phase of the project operation where the actual impacts of the project will be known on the ground.
- iii. Proper recording of grievances and their solutions should be kept with the site office and submitted to national agencies as and when sought.
- iv. Any grievances filed and how the grievances have been resolved shall be documented in the annual environmental monitoring reports during operations phase.