

**DRAFT**

# **Grievance Management Mechanism**

**SHERIFF STREET-MANDELA AVENUE ROAD UPGRADE PROJECT**

**ATN/SF - 11841-GY & ATN/OC-11841-GY**

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## **ABBREVIATIONS / ACRONYMS**

EA	Executing Agency
EI	Environmental Inspector
ESS	Executing Agency's Stakeholder Specialist / Social Specialist
MSC	Multi-Stakeholder Committee
PCLO / CLO	Project Community Liaison Officer
SEF	Supervisory Engineering Firm
SF	Supervisory Firm

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## DRAFT GRIEVANCE MANAGEMENT MECHANISM

### Acknowledgement

Note: A “Blueprint” for a Grievance Mechanism was prepared for the East Bank Highway Project by IDB Consultant S. Mangal. The IDB approved this “Blueprint” and it has been used as the standard reference from which it has been adapted, modified and streamlined to serve as the Grievance Management Mechanism guideline for the Sheriff Street- Mandela Avenue Road Upgrade Project.

## I Introductory Notes

### (i) General Purpose

An effective Grievance Procedure is seen as an essential measure for fairly and equitably addressing complaints and grievances during the project cycle and as a safeguard against negative claims and actions by road users and stakeholders.

### (ii) Process Note

In order to serve as a practical and effective tool and to encourage participation & ownership in its development – it is required that the draft of the Grievance Management Mechanism be reviewed, adapted and adopted by relevant WSG project staff and the Multi-Stakeholder Steering Committee (MSC) during the design phase of the project so that it may be fully in place during the construction phase of the project.

### (iii) Standard Operating Procedures

The Grievance Mechanism outlines a suite of standard operating procedures to guide the implementation and application of the Grievance Management Mechanism.

## THE FOLLOWING ELEMENTS OF THE DRAFT GRIEVANCE MECHANISM ARE PROPOSED FOR CONSIDERATION

### 1. Grievances

#### 1.1 Definition of a Grievance

A grievance is defined as an actual or perceived problem that might have grounds for complaint.

#### 1.2 Types of Grievances & Potential Impacts & Effects

A sample of grievances and resulting impacts and effects are identified below but are not limited to the examples below:

- 1) Road congestion, queues or long traffic delays at road works
- 2) Restricted access to driveways, side roads off of Sheriff Street and/or Mandela Avenue
- 3) Construction noise, dust, and vibrations daytime and
- 4) Effects of the construction labor force on the neighboring villages, including local services and infrastructure
- 5) Pollution of local water with debris
- 6) Risks to community health and safety
- 7) Damage to surrounding environment
- 8) Damage to property not foreseen/discussed with stakeholders in the Construction Management Plan
- 9) Inappropriate conduct of construction workers towards stakeholders, particularly women and minors
- 10) Concerns about procedural irregularities / conduct of Contractors’ staff, Executing Agency staff, MSC members.
- 11) Prolonged or unplanned loss of utility service (water, electricity etc.)
- 12) Difference in final road designs as shown to stakeholders and what contractors are actually doing on the ground.

- 13) Claims of financial impropriety.
- 14) Non-response on employment inquiries.
- 15) Concerns about whether the project is meeting its objectives
- 16) Departure in Contractor's activities from what was discussed and is legitimately expected by stakeholders with respect to the overall Construction Management Plan, Traffic Management Plan, Communications Plan, Environmental Management Plan and any other relevant plans.
- 17) Any other matter related to the effects of construction.
- 18) Any other relevant matter deemed worthy of complaint.

### **1.3 Who May Submit a Complaint?**

*The following persons may submit complaints*

- 1) Persons resident or operating a business in the project site.
- 2) Road users who are directly impacted.
- 3) Persons who observe a situation that is a risk to any other stakeholder, contracted workers, contractors, government officials, or the public in general.
- 4) Persons will be able to submit a grievance to the Project if they believe the practice is having a detrimental effect on their community, the environment, their quality of life.
- 5) A person does not have to be the person directly affected to draw the attention of the Project to a particular adverse effect.

## **2 Procedures for Making & Receiving a Grievance or Complaint**

### **2.1 General Points of Contact & Avenues for Stakeholders to Lodge Complaints**

*The following avenues and general points of contact provide opportunities through which stakeholders can directly register a complaint:*

1. The Project Telephone Hotlines
2. System for direct communications/ contact mechanisms by every Contractors for stakeholders t
3. The quarterly Stakeholder Forums held by the MSC
4. Direct contact/visits to the PCLO's office
  - o The PCLO is responsible for logging complaints, passing them on for investigation, and responding to the stakeholder on the issues according to the procedures specified.

### **2.2 Grievance Management Responsibilities & Related Procedures**

***The Project Community Liaison Officer (PCLO) is expected to manage the flow of information around this process but the Responsibility for incident intervention should reside with the Supervisory Firm and contractor technical teams.***

(1) The PCLO would receive comments and complaints and shall sort them by complaints specific to contractors and complaints or comments about the project in general. The PCLO shall compile a weekly list of comments received for the Contractors and those concerning the project in general. This shall be part of their weekly reports and collated summary for the EA. Copies can also be provided for the MSC.

(2) All complaints about the project in general shall be forwarded to the EA's Social Specialist at the end of every week and directed to the attention of the relevant personnel for action. If the complaint is deemed one of a very serious nature, it should be forwarded within 24 hours.

(3) The PCLO shall explain to the stakeholder when logging the complaint to whom the complaint is being directed and, that depending on the nature of the complaint, the PCLO should also advise the stakeholder on the timeframe for response and follow-up action. The PCLO may also provide the contact information for the MSC to the complainant for further reference.

(4) The EA's Social Specialist shall bring any matters deemed serious Project Manager's attention. A complaint shall be considered serious if:

- a. It is likely to undermine any of the project's intended safeguards if it is not immediately attended to
- b. A breach of contract between the EA and any of the contractors
- c. It involves an illegality

(5) The Project Manager shall ensure that the complaint is investigated.

(6) The EA's Social Specialist shall send a Complaints Investigation Report to the PCLO within one week for the PCLO to send to the stakeholder and a copy to the MSC.

(7) If the complaint pertains to the MSC or is of a nature that is not urgent, then it should be tabled for discussion and resolution at the nearest date of the MSC meeting. The EA's Social Specialist should communicate with the PCLO and ensure that he/she notifies the stakeholder that the matter would be discussed at the next MSC meeting and that the stakeholder would receive a response within one week of the date of that meeting. The MSC and EA should make every effort to discuss the issue and provide a Complaints Investigation Report to the PCLO within 24 hours of their sitting so that it could be forwarded to the stakeholder.

(8) If the matter pertains to the MSC and is of an urgent nature the EA may call may request an extraordinary meeting of the MSC.

(9) In some cases the MSC may find it necessary to arrange a meeting with the stakeholder to address the issue raised. In this case no less than three members of the MSC must be present at the meeting and a summary report of the outcome should be provided to the wider membership.

(10) The MSC should be prepared to explain situations/ respond to the kinds of complaints and comments received at the Open Forums held following their site meeting.

(11) It should be noted that complaints about conduct and impropriety warrant a careful examination of any breaches in the project and correction to ensure that the project safeguards are not compromised. Where the breach concerns the conduct of a particular MSC member then the Internal Operating Protocols would specify the course of corrective action that should be taken.

(12) All complaints received by the project and the responses should be collated and made available to relevant personnel for the record and copied to the MSC. These reports should also be posted on relevant websites in keeping with transparency standards.

### **2.3 Grievance Log Book**

*The Project shall develop and maintain a Grievance Log Book that will be designed/utilised as follows:*

- Each complaint will be lodged in this Grievance Log Book and will have a Complaint Reference Number.
- The Log Book should be designed and printed with duplicate pages, (similar to that of a receipt book) in order that each complaint is recorded in duplicate with the date and summary of the complaint made, a Complaint Reference Number and contact information for the relevant project authorities to whom the complaint will be referred. An option would be available for the complainant's contact information to be

recorded, but only if so desired by the complainant, since confidentiality and anonymity is a guaranteed safeguard of the process.

- The duplicate page with the Complaint Reference Number, contact information for the relevant project authorities, date of entry and summary of complaint etc. should be given to the Complainant immediately after the complaint is logged.
- The Log Book should, for each complaint, carry a section on the results of investigation, follow-up action, date when the stakeholder was notified of the results of the investigation as well as a record of the outcome of any resolution or action taken etc.

### 3. Risk Assessment of Grievances / Complaints

#### 3.1 Risk Assessment Sheets

Simple Risk Assessment Sheets are recommended.

There should be a standard guide or template produced for assessing level of risks in three categories:

low risk; medium risk, high risk.

It is recommended that such a guide be produced and annexed to the ESMP for the project.

The key here is to make the initial risk assessment part of a rapid, practical and satisfactory response mechanism. It must be kept simple and effective.

- An assessment of the risk for each complaint / grievance registered must be done and recorded.
- The risk assessment must be shared by all on the Project team, contractors included, where relevant.
- The risk assessment must also be shared with the Multi-Stakeholder Committee.
  - Concerns need to be logged according to the level of risk and point persons triggered for responsibility for specific tasks.

#### 3.2 Assessment/Classification of Risks

*Below are the three categories of risk and recommended procedures to be followed.*

##### 1. **LOW** (Likely to be of minor impact, easily resolved/managed)

###### ***Procedures to be followed***

- The EI shall contact the Contractor's ESS and conduct an investigation.
- An investigation must be launched within 48 hours of the time the PCLO received the complaint.
- The results of the investigation and any resolution should be noted.
- If the complaint was found to be unsubstantiated, this should be noted. The reason shall be given
- *If the problem is assessed as likely to recur, then this must also be noted and mitigation actions stated to reduce risk of recurrence also noted for the record.*

##### 2. **MEDIUM** (Likely to pose medium level impact, may have arisen as a one-off situation requiring quick and targeted action to resolve, or requires an integrated series of actions to resolve the situation.)

###### ***Procedures to be followed***

- The EI shall contact the Contractor's ESS and decide which staff members should be assembled into a team to conduct the investigation.
- The investigation must be launched within 24 hours of the time PCLO received the complaint.
- The Project Site Manager may decide to stop work to allow for corrective action.
- The results of the investigation and any resolution should be noted.
- If the complaint was unsubstantiated, this should be noted.
- If the problem is assessed as likely to recur, then this must also be noted and mitigation actions stated to reduce risk of recurrence also noted for the record.
- If additional problems were discovered and dealt with, this should also be noted.

3. **HIGH** ( A serious violation or a serious risk to the stakeholders and/or general public directly or indirectly affected, serious impacts of an environmental, social or financial nature likely to jeopardize the integrity of the project.)

**Procedures to be followed**

- The investigation must be launched immediately and no later than 24 hours of the time the PCLO received the complaint.
- The EI shall contact the EA and organize a major investigation team comprised of the EA, the Contractor's ESS and other staff, and the NDC or M&CC Councilor.
- The EA shall request that work is stopped if necessary.
- The results of the investigation and any resolution shall be noted.
- If the complaint was unsubstantiated, this should be noted.
- If additional problems were discovered and dealt with, this should also be noted.
- All corrective actions shall be detailed, including those already implemented and a schedule for implementation shall be recorded.
- The EA's Environmental Engineer and Social Specialist shall be required to monitor outcome.
- The EI shall provide a close out report, which the PCLO shall keep in their records.

#### 4. Investigation of Complaints

##### 4.1 Inspection Team

*The Proposed composition of the Inspection Team may comprise at least three to four of the following personnel depending on the nature of the investigation with The Environmental Inspector (EI), The Environmental Engineer, (EE). the Project Community Liaison Officer (PCLO), The Social or Stakeholder Specialist (ESS), A representative of the Multi-Stakeholder Committee (MSC).*

##### 4.2 Inspection & Outcome Report of Investigation of Complaint

***The Inspection Team shall conduct an investigation into the Complaint within one week of receiving a Complaint, seek a timely resolution of the problem(s) and produce and submit a summarised Investigation Outcome report within one week after conducting the investigation. Maximum total turn-around time is two weeks from inspection to resolution and report.***

##### 4.2.1 Content of Investigation Outcome (Sheet) Report

- The Investigation Outcome Report should be kept simple and should state the particulars of the investigation, corrective actions taken and final outcome.
- It should also note if there were any confounding factors that should be handled by parties outside of the project.
- The Environmental Engineer should name the parties responsible so that the EA may follow-up.
- If any confounding factors are found the PCLO shall contact the EA's Specialist immediately and send a copy of the Investigation sheet.

##### 4.2.2 Procedures to be followed:

- The PCLO must be provided with a copy of an Investigation Outcome Sheet.
- The Investigation Outcome Report must be signed by both the Environmental Inspector and Contractor's ESS within seven days (7 days) from the time the complaint was logged with the PCLO.
- If more time is required for the investigation, an extension of a further 7 days may be requested and mutually agreed by the complainant.
- The maximum timeline for submission of the Investigation Outcome Sheet is set at fourteen days (14 days) from the time the complaint was logged with the PCLO.



- Once an investigation is complete, the EI shall forward the Investigation Outcome Sheet to the PCLO within twenty-four hours.
- The PCLO shall make a copy of the Investigation Outcome Sheet bearing the Complaints Reference Number and description of problem.
- The PCLO should write a polite cover letter to the stakeholder noting the outcome of the investigation and attaching the investigation sheet.
- This shall be done immediately upon receipt of the Investigation Outcome Sheet from the Environmental Inspector and no later than 14 days after the complaint was lodged.

#### **4.3 Confounding Factors**

Factors caused by parties outside the project are who are at fault or are responsible for issues that are:

1. Affecting the project directly
2. Affecting stakeholders in a manner that they are attributing the effect to the presence of the project
3. A threat to safety and health.

##### **4.3.1 Procedures to be followed re Confounding Factors**

- The EA should contact those parties within 48 hours of receipt of the report from the PCLO and seek a resolution to the problem.
- The EA's Social Specialist and other staff would have to assess/judge the severity of the issue (the classification of the Grievance should guide them) and may respond more urgently if necessary.
- The EA should seek a resolution within two weeks of first contact with the relevant parties.
- The EA's Social Specialist should forward in writing to the PCLO the outcome of the engagement noting
- any corrective action taken and/or contact information for the stakeholder to follow-up directly.
- The PCLO should then issue a letter to the stakeholder informing them of the outcome.

#### **4.4 Turn-around time for responding to complaints: The following schedules are recommended:**

- 24 hours timeframe for official acknowledgement of Complaint received/logged by PCLO.
- A maximum of 3 days for providing feedback/ update to complainant;
- A maximum of 5 days for Inspection/ Investigation to be mobilised and to make relevant site visit(s).
- A maximum of 14 days for taking relevant action / addressing the complaint and submission of report.
- If the complaint or grievance cannot be addressed or resolved within 14 days, then the relevant authority must provide a suitable response to the person lodging the grievance and offer a reasonable timeframe for its resolution.

#### **4.5 Disputes Arising from Inspections/Investigations & Actions of Grievances/ Complaints Logged**

##### **4.5.1 Stakeholder Dissatisfaction with Investigation and Corrective Actions**

In the event that a Stakeholder is dissatisfied with an investigation and/or corrective actions, the stakeholder should contact the EA's Social Specialist stating their concern.

##### **4.5.2 Procedures to be taken**

***The EA shall take the following steps:***

- (1) The EA's Social Specialist and Environmental Engineer shall assemble a Review Team to review the case within forty-eight hours of the dissatisfaction complaint logged.
- (2) Representation from the MSC is recommended as part of the Review Team

- (3) Depending on the severity of the situation, and based on the Review Team’s assessment, the EA would make an informed judgment of the situation and whether it needs immediate action to be taken, and if so would the EA would take such action with immediate effect.
- (4) Depending on the outcome of the review, and less immediate action required, the EA’s Environmental Engineer and Social Specialist should visit the site and conduct an independent inquiry within one week.
- (5) The EA’s staff shall provide a written Dispute Assessment Report with their findings and any corrective action requested. This report shall be sent to the PCLO, Environmental Inspector, and the Contractor’s ESS and Project Manager.
- (6) The EA’s Social Specialist shall send a response letter to the stakeholder within seven days notifying them of the findings and action taken.
- (7) The EA shall formally notify the MSC of the incident, relevant action taken and outcome in its bi-monthly report.

#### **4.5.3 Non-Cooperation of Contractors / Contractors’ Staff**

In the event that non cooperation by contractors or contractor’s staff poses the risk that the investigation of a claim could be compromised in quality and time in the course of an inspection and/or corrective actions to be taken, the Environmental Inspector or EA’s Project Engineer should immediately contact the Contractor’s Project Manager and seek a resolution.

- (1) If there is no change in the disposition of the Contractor’s staff within forty-eight hours the Environmental Inspector and/or the EA’s Project Engineer should contact the EA’s Social Specialist and/or PCLO requesting the EA’s immediate intervention in the claims investigation process.
- (2) The EA should engage the Project Manager and secure the Contractor’s cooperation forthright.
- (3) Failure of the Contractor to respond to the EA’s intervention within twenty-four hours should be viewed as a serious breach of safeguards and Contract. The EA should respond as is appropriate for the management of Contracts. The EA should provide an incident report to the MSC in its bi-monthly report.

#### **4.5.4 Under-Performance of the PCLO, Environmental Inspector, Social Specialist**

In the event that the Environmental Inspector finds that the PCLO is not passing on claims to all parties in a timely manner or similarly, if the PCLO finds that the Environmental Inspector is late in passing on the Investigation Outcome Sheet or Interim Investigation the following procedures are to be followed:

- (1) This should be brought first to the attention of the under-performing staff verbally, then in writing if necessary (if no change is observed and/ or the problem persists).
- (2) If the problem persists (at least three incidents or a quarter of all complaints) the matter must be brought to the attention the Supervisory Engineering Firm’s Project Manager for internal resolution.

### **5. Stakeholder Complaints to “Third Parties”**

- (1) From time to time the stakeholders may approach third parties – particularly the NDC, Contractor’s staff, members of the MSC, staff of WSG or the Ministry of Public Works to make complaints about the project. If this happens, the staff or members of each of these should be sufficiently aware and prepared to explain to stakeholders that:
  - a. Their concern is important and that the project will respond but,
  - b. The procedure for lodging complaints, which has a proper follow-up system and protection for the stakeholder, is through the PCLO by phone, office visits, during open houses, and/or MSC Open Forums.

- (2) The stakeholder should be given the number of the PCLO as well as the EA's Social Specialist in the event that there is no response from the PCLO.
- (3) The person approached by the stakeholder should contact the PCLO within twenty-four hours advising him/her of the complaint and possibly providing a contact number for the stakeholder.
- (4) The PCLO should not wait to be contacted by the stakeholder. He/she should instead contact the stakeholder within twenty-four hours, to inquire and possibly formally log a complaint.
- (5) NDC members, MSC members, Staff of Contractors, and staff of the Ministry of Public Works and Communications, should be adequately trained and/or made adequately aware that they should refer a stakeholder to the PCLO's office or Hotline.
- (6) All staff of the Contractors should receive training to direct the stakeholder to the hotline (there should be signs in the work site with the contact numbers) and/or their supervisor on site.
- (7) The Supervisor should advise the stakeholder but also contact the PCLO to trigger the investigation process. Even if the Supervisor can resolve the complaint on the spot, the supervisor should contact the PCLO within twenty-four hours advising him/her of the complaint for the record and the outcome. The Supervisor also should provide a contact number for the stakeholder so that the PCLO may follow up to determine whether the stakeholder was satisfied.
- (8) In circumstances where the Contractor's ESS/CLO receives a complaint, he should advise the stakeholder and also contact the PCLO with the details within twenty-four hours.
- (9) In the event that the ESS/CLO resolves the matter immediately (within twenty-four hours) he/she should still notify the PCLO that the complaint had been received, its nature, date, corrective action taken, and outcome. The PCLO should ensure that the incident is recorded in their weekly report and that the EI receives a copy. The incident should also be recorded by the ESS/CLO in their reports. This is important for the monitoring and evaluation and learning lessons and improvements for all WSG road projects.

## **6. Mediation Committee**

### **6.1 Composition**

A Mediation Committee will be established as part of the grievance management process to be comprised of three persons as follows:

- The Project Manager who will represent the IDB Safeguards Committee on the ground;
- One member selected by the Executing Agency, this person should not be a holder of a political office;
- One member from the non-governmental community in Guyana selected by the Multi-Stakeholder Committee (MSC).

### **6.2 Procedures**

- (1) The Mediation Committee shall be coordinated by the IDB Project Manager and shall convene a meeting within ten working days of receiving a request for mediation.
- (2) The Committee shall allow each side in the dispute to present their case and should seek to the greatest extent possible to find a solution and reach an agreement during the meeting

- (3) The Committee shall be guided by the intended social and environmental safeguards of the project, stakeholder involvement in social oversight, and the responsibilities of the EA as manager of the project.
- (4) If it is not possible to reach an agreement at the meeting the Committee should deliberate the facts and come to recommended course of action as a resolution and send the decision to the parties in writing within one week of the meeting.

### **6.3 Mediation Dispute Options**

#### **1. Mediation Committee**

The first measure for mediation of any unresolved grievance or complaint is for the grievance/complaint to be brought forward to the Mediation Committee as a first mandatory measure, as outlined above.

#### **2. External Arbitration**

As an optional alternative interim measure, an external mediation or arbitration process may be used or accessed by mutual consent if the project's Mediation Committee is unable to bring resolution to the issue at stake;

#### **3. Court of Law**

If there is no resolution of the grievance after due process through the project's Mediation Committee or by the optional recourse to external Arbitration, or the Arbitration option is not wished or used by the parties concerned, then the complainant shall have due recourse to seek representation in a court of law as a right under the Guyana Constitution.

### **6.5 Availability of Grievance Reports**

Grievance Reports must be available on request for tracking purposes by the IDB, the Executing Agency, Supervisory Firm or Contractor Company and the Multi-Stakeholder Committee.

### **6.5 Confidentiality and Anonymity**

The Standard Operating Procedure will provide protocols for safeguarding confidentiality and anonymity of complainants.

### **6.6 Handling Malicious or Mischievous Reports**

- (1) The PCLO shall keep track of the number of reports per month that are unsubstantiated and look for patterns that could be attributed to mischievous intent. The PCLO shall also track the calls received, noting calls that are malicious in any way and taking note of any relevant patterns.
- (2) All calls of a malicious or mischievous nature as well as "crank" calls should all be recorded in the Reports of the PCLO, including PCLO reporting to the MSC.
- (3) Depending on the nature and number and pattern of such calls and if any threats or other negative trends are included, such calls should also be reported to GT&T for investigation.
- (4) In any project one can expect some degree of this. If it is found that false complaints are of a repeat nature and show a pattern, a formal response and action may have to be taken, especially if such calls exceed 30% of the total complaints received.
- (5) If the situation is deemed very serious, the Supervisory Engineering Firm, via the appropriate legal channel, should request the call log from the phone company so that the numbers from which mischievous calls were made could be available to the MSC for legal action.

- (6) In the case of any persistent calls that amount to harassment of the project staff or intent to harm the project the EA should make a formal complaint for police investigation.

## 7. Awareness of the Grievance Mechanism

### 7.1 Internal Project Awareness

- A stakeholder Grievance mechanism cannot be successful if stakeholders are unaware of the details of how it should function, timelines for response, and contact points. Similarly, all the staff of the contractors and all members of the NDC should be made aware so that they can act their part whenever the need arises. All members of the MSC and the EA need to be fully aware in order to discharge their duties and fulfill their respective roles in the project safeguards process.
- The Grievance Mechanism should be reviewed and discussed with adequate time dedicated to this activity in the MSC Inception Workshop.
- The Grievance Mechanism, as part of the SEP, should also be part of the induction of any training of Contractor's staff required in the pre-construction period and staff training on the SEP required of the Engineering Supervisory Firm.

### 7.2 Public Awareness

- (1) **Posters** : Simple Posters providing key information about the Grievance Mechanism should be produced. Proposed poster information should highlight: to whom and where to take a complaint; and outlining the complaint procedures and the expected timeline for responses. Hotline numbers and contacts for the PCLO and EA Specialist should be clearly visible on such posters. These posters should be posted throughout the project site at the many shops and businesses in the site, the post office, schools, NDC office, health centres (churches, mosques and mandirs – with permission), contractors site offices, and police stations. These posters should be posted as soon as possible in the pre-construction period. (All Contractors' Site Office signs should carry the phone numbers of the hotline to call.)
- (2) **Billboards**: Billboards marking the project site should carry the phone numbers of the hotlines.
- (3) **Media**: The project's initial advisory and on-going communications to the media (television, radio, and newspapers) should reference the Grievance Mechanism: the procedure for making and resolving complaints. Hotline numbers and contact information for the PCLO etc.
- (4) **Websites**: The MSC website as well as the EA's and IDB's website should carry the relevant information as well. The entire Grievance Mechanism should be published on the MSC website with a clearly marked link. This link should lead to the mechanism and to the reports on complaints and outcomes tabled to the MSC.
- (5) **Wallet / Pocket Cards**: A small wallet or pocket card with the contact information should be printed and disseminated to MSC members, all staff on the project,
- (6) **Email Advisory**: An email advisory on the Grievance Mechanism should be sent to all database contacts.

## 8. Tracking Effectiveness of the Grievance Mechanism

The EA and the MSC should review the implementation of the Grievance Procedure every quarter for the effectiveness of response or any issues arising. Adjustments should be made if they would improve the performance of the system without prejudicing any stakeholders. or diluting opportunities for stakeholders to bring a complaint to the attention of the project.