



Kingdom of Tonga

MINISTRY OF EDUCATION & TRAINING

TONGA SAFE AND RESILIENT SCHOOLS PROJECT (P174434) and Additional Financing

STAKEHOLDER ENGAGEMENT PLAN

April 2022

Document history

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Abbreviations and Acronyms

AF	Additional Financing
CESMP	Contractor Environmental and Social Management Plan
COC	Code of Conduct
CRPD	Convention on the Rights of Persons with Disabilities
CSU	Central Services Unit (MOF unit supporting WB Project implementation)
EHS	Environmental Health and Safety
EMIS	Education Management Information System
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
E&S	Environmental and Social
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GOT	Government of Tonga
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
MET	Ministry of Education and Training
MEIDECC	Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications
MCCTIL	Ministry of Commerce, Consumer, Innovation, Trade, and Labour
MIA	Ministry of Internal Affairs
MLNR	Ministry of Lands and Natural Resources
MOF	Ministry of Finance
MOI	Ministry of Infrastructure
OHS	Occupation Health and Safety
PAP	Project Affected People
PMU	Project Management Unit
PREP	Pacific Resilience Program
PSC	Project Steering Committee
PTA	Parents and Teachers Association
SEP	Stakeholder Engagement Plan
SET	Skills and Employment for Tongans (WB project)
TOR	Terms of Reference
TSRSP	Tonga Safe and Resilient Schools Project (the Project)
WB	World Bank

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1 INTRODUCTION

The Government of Tonga (GOT) has requested funding for the Tonga Safe and Resilient Schools Project (TSRSP) under the WORLD Bank (WB) International Development Association 19 (IDA19) grant. The implementing agency (IA) will be the Ministry of Education and Training (MET) and funding will cover implementation of technical components, and project management. The 'Project' describes the Parent Project (which was approved in late 2021) plus Additional Financing(AF) which will both be supported by this document and will include the following four components, with funding to be refined during project preparation:

1. Improving Multi-hazard Resilience of Education

1.1. Resilient Infrastructure Investments

1.2. Strengthening Education Infrastructure Planning and Maintenance

2. Establishment of Education Management Information System (EMIS) and improved quality of teaching

2.1. Establish a comprehensive EMIS to inform policy decision making

2.2. Upgrading the quality of the teaching profession

3. Contingent Emergency Response Component (CERC) - Unallocated project funds may be requested for re-allocation to support response and reconstruction in case of a major crisis or emergency.

4. Project Management

Activities which will be financed by the TSRSP include (but are not limited to):

- Project Management Unit (PMU) positions
- Local technical consultants and firms to provide design or technical assistance for the project
- International technical consultants and firms to provide design or technical assistance for the project
- Civil works contractors to implement construction works under contract.

Activities to be undertaken under the Project are required to comply with the WB Environmental and Social Framework (ESF)¹ and the Project has been rated by the WB as having moderate environmental and social risks² given risks and impacts are not likely to be significant, large or complex and are expected to be predictable, temporary and reversible. Risks are expected to be easily mitigated in a predictable manner and the project is expected to be largely positive.

The Environmental and Social Standards (ESSs) within the ESF that are considered relevant to the Project are:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts

¹ 2016. World Bank Environmental and Social Framework. World Bank, Washington, DC.

<https://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

² Concept Environmental and Social Review Summary, Concept Stage (ESRS Concept Stage), Date Prepared/Updated: 02/26/2021 | Report No: ESRSC01848

- ESS2 Labour and Working Conditions
- ESS3 Resource Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8 Cultural Heritage (chance finds)
- ESS10 Stakeholder Engagement and Information Disclosure.

This document provides the SEP, to facilitate planning and implementation of ESS10 for the TSRSP (including the AF).

2 OBJECTIVES OF THE SEP

The WB ESF ESS10 recognizes the importance of open and transparent engagement between the TSRSP and stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability, enhance project acceptance, and make a significant contribution to successful project design and implementation.

ESS10 objectives are:

- To establish a systematic approach to stakeholder engagement that will identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected people (PAP).
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with PAP throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide PAP with accessible and inclusive means to raise issues and grievances, and allow the TSRSP to respond to and manage such grievances.

The project continues a number of activities which were undertaken as part of the Pacific Resilience Program (PREP) which undertook widespread consultation and was well supported. TSRSP benefits from the high awareness and positive support of PREP, with an expectation that it will also produce positive community benefit expected to improve education, access and infrastructure sustainability. There is a risk the project will fail to provide adequate information and involve the local community, staff and families in construction planning and programming. A staged construction program which would result in a continuous education service will reduce the risk of service interruptions, address contractor occupation of the site (works, administration, facilities etc) and student safety. This risk is minimal and unlikely, if the Project incorporates lessons learnt from the school's construction activities undertaken by the PREP and ensures the school community and administration is involved in project planning. During preparation, the MET will revise the SEP to identify/confirm existing

stakeholders, describe the process for sharing information on project activities, and seeking/incorporating feedback on project design and implementation.

3 TONGAN REGULATIONS

This SEP takes into account the existing institutional and regulatory framework within the context of the following Tongan legal instruments:

- Environment Impact Act
- Land Act
- Local Government Act.

4 PREVIOUS ENGAGEMENT ACTIVITIES

Component 1.1 is fundamentally a continuation of the PREP school's construction with current consultation activities building upon the broad public consultation that was previously undertaken to build project awareness and ownership of the project. This broad public consultation was undertaken during the development of the PREP ESIA/ESMP (CARDNO, 2019) then continued throughout project implementation by the PMU, contractors and TA.

Current consultation leverages the relevant engagement for PREP on the repair and reconstruction of 43 buildings (33 reconstructed), and 21 toilet blocks. Additional consultation was also undertaken during the implementation phase with the development of the CESMP. The same approach will be used for the TSRSP. With the disclosure of this document for public comment, consultation with key stakeholders for the design phase and then school and community engagement for the construction phase.

TSRSP targeted consultation has been undertaken by MoET focussing on the School Reconstruction component, actively engaging with school communities, Parents and Teachers Associations (PTAs) and key technical stakeholders. Broad engagement will be undertaken as part of the school selection and detailed design process and will include PAPs, vulnerable stakeholders and current school staff and families.

Key stakeholders include the Ministry of Infrastructure, contractors, design consultants, school communities, P&T and special interest groups (these groups were utilised on PREP as community reference groups, with a similar model planned for TSRSP) seeking feedback on construction plans & methodology, impact mitigation and WASH design.

Methods of engagement have included face to face site meetings, group consultations, technical working groups and surveys. PREP has provided key lessons learnt which will contribute to The Project's development with the PMU M&E officer engaging all schools under the reconstruction component (package 1-7) and WASH facilities (Package8) to seek feedback and to determine levels of stakeholder satisfaction.

In regards to TSRSP, technical working groups, sessions have been undertaken which have involved international consultants, Government staff, School P&T, PMU and WB representatives,

As the project progresses, the PMU, DSC and the contractors will continue to consult during design and development of the CESMP to communicate and elicit feedback to manage the impacts and risks associated with each of the specific construction sites. Section 8.2 details a broad programme for consultation and engagement.

All project documents, including this SEP, have been disclosed on the MET, Ministry of Finance (MOF), Central Services Unit (CSU) websites and the WB website.

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Meaningful consultations with different categories of stakeholders, and disclosure of relevant information to the different stakeholders in a timely manner, is an essential part of risk management and stakeholder ownership of the Project.

6 STAKEHOLDER IDENTIFICATION

In order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs, expectations, priorities and objectives in relation to the Project. This information will be used to tailor engagement to each key stakeholder.

Engagement will be directly proportional to the risks and impacts of each Project activity. As the extent of the risks and impacts of a Project activity on a stakeholder increases, the level and type of engagement needs to be assessed and adjusted. With the social risks associated with the Project identified as moderate and many of the risks associated with Component 1 (infrastructure), which is a continuation of the PREP under Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications (MEIDECC), the project consultation will build upon existing knowledge and support, and focus on targeted consultation, with project messages building upon existing information and understanding of previous works. Engagement will be targeted with the key stakeholders identified in Table 1, as the Project advances this list needs to be adjusted as new stakeholders are identified through assessment processes such as Environmental and Social Management Plan (ESMP).

Table 1 Key stakeholders

Stakeholder	Type of Engagement
World Bank	To be kept updated by the PMU on project progress and issues, and to be consulted on appropriate approaches with regards financial management, E&S, procurement and M&E
Ministry of Education and Training (MET)	To be kept updated by the PMU on project progress and issues and to disclose all Project documents on their website. To keep the PMU informed on any relevant ministry and GOT policies that may affect the Project
Project Steering Committee (PSC)	To be kept updated by the PMU on project progress and issues and to keep the PMU informed of any changes to GOT policies or requirements for the project
Project Management Unit (PMU)	To facilitate the disclosure of all documents and information and to support contractor consultations and the movement of all information to relevant stakeholders on matters affecting the Project
Ministry of Finance (MOF)	To be kept updated by the PMU on project progress and issues and to disclose all Project documents on their CSU website. The Tonga Digital Government Support Project (TDGSP) being financed by the WB and managed by the MOF has synergies with TSRSP and as such will require consultation with regards the Education Management Information System (EMIS)
Ministry of Internal Affairs (MIA)	To be kept updated by the PMU on project progress and issues and to facilitate any synergies between the TSRSP and the Skills and Employment for Tongans (SET) Project particularly around the EMIS

Stakeholder	Type of Engagement
Ministry of Infrastructure (MOI)	To be kept updated by the PMU on project progress and issues and to provide permits for construction when necessary and information around projects which may cause cumulative impacts
Ministry of MEIDECC	To be kept updated by the PMU on project progress and issues and to leverage knowledge and lessons learnt from the PREP Project. To be engaged early on in the process for any required environmental permits
Ministry of Lands and Natural Resources (MLNR)	To be kept updated by the PMU on project progress and issues and to provide necessary support on land access or occupation issues where necessary
Design and Supervision Consultant (DSC)	To undertake consultation with proposed design and activities with school's administration and PTAs and be kept up to date by the PMU on all issues and changes related to design and construction, procurement and E&S
Contractors	To be informed about contract opportunities and upon being contracted, undertake community awareness and consultation around their activities including promoting the GRM
School administration, boards and governance structures	To be consulted during the design/approval and construction phases of the project then to be kept updated by the PMU on project progress and issues. . Formal consultation will be required with these stakeholders.
Parents and Teachers Associations (PTAs)	To be consulted during the design/approval and construction phases of the project then to be kept updated by the PMU on project progress and issues. . Formal consultation will be required with these stakeholders.
Teaching staff	To be widely consulted regarding the room designs, EMIS and teacher professional development
Students	To be informed of construction activities, site and construction risks including traffic
Project Affected People (PAP)	To be consulted where direct impacts have been identified through the impact assessment process. To be kept informed and have ample opportunity to provide feedback and grievances
Relevant non-government organisations (NGOs)	To be kept informed of all Project activities and have ready access to Project documents and access to channels for communicating feedback and grievances. To participate in targeted consultation
Media	To be used to channel information and provide feedback
General public	To be kept informed of all project activities and have ready access to project documents and access to channels for communicating feedback and grievances. In particular the general public and key stakeholders should be made aware of changes to privacy if relevant to the EMIS. To be provided the opportunity to participate in targeted consultation

6.1 Project Affected People

Project affected people (PAP) are those people that are directly or indirectly affected by the Projects activities. Component 1.1 Resilient Infrastructure Investments will have the greatest impacts and risk associated with its activities. The locations of the sites are yet to be determined, however the impacts are likely to be constrained to the construction site and intermittently, construction material transport routes. Any specific site issues will be identified by the DSC and the PMU during the design phase and prior to implementation of construction. Any PAP that are identified as not having sufficient information will be identified and included in the required engagement detailed in the Contractors Environmental and Social Management Plan (CESMP). The PAP include:

- School administrative officers
- Parents and teachers
- Students
- Communities or individuals that may be directly adjacent to Project construction activities and be impacted by such issues as construction noise, dust, and traffic and any community health and safety issue that may be identified in the projects E&S assessments
- Communities or individuals that may be directly affected by the Projects development of an EMIS, such as privacy and data security and those that will be directly impacted by teacher professional development activities.

6.2 Other Interested Stakeholders

Any other interested stakeholders that are identified through the design and implementation of the project can be included and added to the SEP with details of type of engagement required.

Other interested stakeholders could include:

- Church groups, particularly where the school is a Church run establishment
- Education NGOs
- Other organisations that target children such as sporting organisations.

6.3 Vulnerable Stakeholders

Vulnerable stakeholders identified for the Project primarily include those associated with gender imbalance, disability access issues, female headed and poor households and any socially excluded group relevant to the education sector. Engagement will include discussions around the recommendations on universal access from the World Bank's Global Program for Safer Schools (GPSS). The reports³ by ARUP noted the need for:

- Improved privacy screens for female toilet blocks
- Improved access for females to appropriate female hygiene disposal facilities
- Access to universal access/disability toilets
- Level well drained walkways and ramps into all new classrooms

During the implementation of Component 1 these issues should be specifically raised by the DSC during PTA and school's administration meetings. Results of these consultations can then be used to include appropriate and simple gender and disability interventions into the bidding documents.

³ ARUP: Tonga, Model School Design Review (Nov 2018) and Tonga Risk Assessment Report (Nov 2019) - Global Program for Safer Schools - Pacific Roadmap

7 SEP Programme

The SEP programme is set out in Table 2 which details the information and disclosure required during Project preparation and implementation. This document has been disclosed along with the other ESF documents including:

- Environmental and Social Commitment Plan
- Labour Management Procedures
- Contingency Emergency Response Component (CERC) Environmental and Social Management Framework (ESMF)
- Covid 19 Safety Protocol
- Environmental and Social Management Plan (Component 1.1)

The ESMP had a 30 day (August 25 to September 23, 2021) public comment period, any additional stakeholders or issues from the public consultation period will be incorporated into the relevant implementing documents such as the CESM.

This SEP Programme outlines the broad engagement and disclosure for the entire Project including a press release and disclosure of documents for public comment on the CSU and Ministry websites. Where individual Component Activities require additional consultation, these will be included in the relevant documentation such as the CESMP.

Any consultation undertaken will consider current Tonga Health guidelines and the COVID-19 Safety Protocol developed for the project.

Table 2 SEP Programme

Stakeholder	Role	Actions	Channel	Phase	Comp
(i) DISCLOSURE					
World Bank	To provide oversight, approvals, feedback and technical support	Disclosure	Disclosure of documents on WB website, CSU Website	All	All
		Review and feedback on appraisal documents, SEP, LMP, ESMP, ESCP	Document control	Project appraisal	All
MET	To provide project management as the Executing Agency (EA)	Facilitate the disclosure of all documents for project appraisal	MET Website, MOF CSU website	Project appraisal	All
PMU	The monitoring and reporting of the activities and actions outlined in this SEP will be undertaken within the E&S section of the PMU with reporting requirements including frequency to the respective agencies (WB, MET and MOF)	MET to develop a page on their webpage to identify the project and upload relevant documents for disclosure	Webpage (wording for webpage introduction Appendix 1)	All	All
MOF	To be kept updated by the PMU on project progress and issues and to disclose all Project documents on their CSU website	MET PMU to provide the necessary reporting and disclosure of information to the MOF	Reports and document disclosure	All	All
CSU	To provide operational advice and capacity building support	CSU to add the project to their webpage and disclose all relevant Project documentation	Webpage introduction to include the message (or similar) as detailed in Appendix 1.	All	All

DSC	To provide design and supervision of infrastructure works.	Undertake necessary targetted consultation with village administration and the general public on proposed designs and constructions.	Disclosure through media outlets	Implementation	1
Contractor	To provide technical inputs and civil works and to be informed of contracting opportunities	For technical inputs there will be greater detail of engagement activities to be undertaken; levels of stakeholder involvement (particularly for affected communities, women and vulnerable people/groups); the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESMPs	Information Disclosure	Implementation	1&2
		Communicate expected risks and impacts and notify PAP	Information Disclosure	Implementation	1&2
		Consult widely on the security and use of data within the EMIS.	Consultation with key stakeholder and information disclosure	All	2
PTAs Teaching Staff	To provide feedback to project implementors	Actively participate in engagement activities and provide feedback to the PMU, DSC and technical contractors for the EMIS	Targeted consultation	Project Implementation	1&2
General public	To actively participate where appropriate to assist project development and implementation and provide feedback	Actively participate in engagement activities	Access to document disclosure Local Media	Project start-up and implementation	1&2

(ii) Project Planning and Preparation					
World Bank	To provide oversight, approvals, feedback and technical support	Review and feedback on appraisal documents, SEP, LMP, ESMP, ESCP	Document control	Project appraisal	All
World Bank	To provide oversight, approvals, feedback and technical support	Review of engagement activities for ESMP and other assessments	Document control	Project appraisal	1
MIA	To provide information and discussion on Project linkages and coordination with the SET Project	MET to facilitate document sharing with MIA and SET PMU to brief staff on the upcoming TSRSP and facilitate any coordinated activities	Direct communication/consultation	Project Start up	2
MET	To provide project management as the Executing Agency (EA)	Establishment of the PMU through an open and fair process	Standard procurement processes, public advertising of positions	Project start-up	All
MEIDECC	To provide necessary permitting	MET PMU to facilitate early engagement with MEIDECC during ESMP and other permitting requirements	Direct communication/consultations	Project start-up	1
General public	To actively participate where appropriate to assist project development and implementation and provide feedback	Actively participate in engagement activities	Public meetings and minutes recorded	Project Start up	1 & 2
(iii) Implementation					
World Bank	To provide oversight, approvals, feedback and technical support	Review and feedback on appraisal documents, SEP, LMP, ESMP, ESCP	Document control	Project appraisal	All
		Review of engagement activities for ESMP and other assessments	Document control	Project appraisal and implementation	1
		Monitor and evaluation of project activities as detailed in the POM	Monitoring and evaluation reporting against results framework	Project implementation	All
	Implementation support	Support missions Aide Memoires	Project implementation	All	

PSC	To provide technical and bureaucratic support and oversight	Provide support to the PMU and provide a conduit for information flow	Regular PSC meetings, briefings to relevant Ministries and departments, feedback to PMU	Project implementation	All
PMU	To provide project management for project implementation. The monitoring and reporting of the activities and actions outlined in this SEP will be undertaken within the E&S section of the PMU with reporting requirements including frequency to the respective agencies (WB, MET and MOF)	Reports to MET CEO	Regular internal reporting as determined by the CEO	Project implementation	All
		Reports to WB	Regular reporting to WB as determined by the POM	Project implementation	All
		Collaboration with MOF CSU	Direct communication/consultation	Project implementation	All
		Introductory Consultation Meeting	Initial Meeting with relevant stakeholders	Project implementation	All
		Call for bids on component activities	Disclosure as determined by the WB procurement process Communication strategies to be advertised widely	Project implementation	All
		Oversight of contractor's consultation processes	PMU E&S Officer	Project implementation	All
		Establish a functional GRM	Details for the GRM are presented in Section 9	Implementation	1 & 2
CSU	To provide operational advice and capacity building support	Provide a link to the GRM	GRM detailed in Section 9 Provide regular feedback to PMU	Project implementation	All
MIA	To provide information and discussion on Project linkages and coordination with the SET Project	MET to facilitate document sharing with MIA and SET PMU to brief staff on the upcoming TSRSP and facilitate any coordinated activities	Direct communication/consultation	Project Implementation	2
MOI	To provide permitting and advice for school construction	Provide necessary permits for construction activities	Standard MOI permitting process with consultation	Project implementation	1
		Provide technical advice and compliance auditing for school construction	Direct communication/consultation	Project implementation	1

MEIDECC	To provide necessary permitting	MET PMU to facilitate early engagement with MEIDECC during ESMP and other permitting requirements	Direct communication/consultations	Project implementation	1
MLNR	To provide necessary support around land issues and any required permits	MET to facilitate discussions with MLNR as required and to be informed of their role within the GRM	Direct communication/consultations GRM detailed in Section 9 Provide regular feedback to PMU	Project implementation	1
DSC	To provide design and supervision of infrastructure works	Undertake necessary targeted consultation with village administration and the general public on proposed designs and construction	Direct communication Public meetings Community presentations and factsheets	Project implementation	1
Contractors	To provide technical inputs and civil works and to be informed of contracting opportunities	MET PMU to facilitate access to a fair and open bidding process	Normal WB approved contractor procurement process	Project implementation	1 & 2
		For technical inputs there will be greater detail of engagement activities to be undertaken; levels of stakeholder involvement (particularly for affected communities, women and vulnerable people/groups); the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the ESMPs	ESMP engagement Direct consultation with PAP utilising various methods appropriate to the individual stakeholder or group. Obtain and list of priority issues and suggested solutions	Project implementation	1 & 2
		Communicate expected risks and impacts and notify PAP	Development of E&S risk and impact strategies within the CESMP for schools	Project implementation	1 & 2

		Facilitate awareness for PAP	Contractors to hold public meetings prior to commencement of works to inform and disclose the activity GRM and contact information to PAP, staff, PTAs, students and school administration Signs adjacent work sites with clear information for contact person and GRM	Project implementation	1 & 2
School administration, boards and governance structures	To provide feedback to project implementors	Actively participate in engagement activities and provide feedback to the PMU, DSC and technical contractors for the EMIS	Targeted consultation and recording of issues that may occur	Project Implementation	1 & 2
PTAs	To provide feedback to project implementors	Actively participate in engagement activities and provide feedback to the PMU, DSC and technical contractors for the EMIS	Targeted consultation	Project Implementation	1 & 2
Teaching staff	To provide feedback to project implementors	Actively participate in engagement activities and provide feedback to the PMU, DSC and technical contractors for the EMIS	Targeted consultation	Project Implementation	1 & 2
PAP	To provide feedback to project implementors	Actively participate in engagement activities and attend public meetings	Public meetings and minutes recorded	Project implementation	1 & 2
		Communicate messaging	Access to disclosed documents	Project implementation	1 & 2
		Facilitate understanding of GRM and access to information	Access to the GRM	Project implementation	1 & 2
General public	To actively participate where appropriate to assist project development and implementation and provide feedback	Actively participate in engagement activities	Public meetings and minutes recorded	Project implementation	1 & 2

8 SEP IMPLEMENTATION

The following steps should be undertaken to implement the SEP (Figure 1).

8.1 Project Preparation, Appraisal and Approval

This SEP is the key guide for stakeholder engagement throughout the Project cycle and is a prerequisite for the appraisal and approval process the WB undertakes for the Project. The SEP will be disclosed on the Ministry of Finance, CSU website (<http://www.finance.gov.to/csu/projects/tsrsp>) and should be disseminated amongst other key stakeholders where relevant.

8.2 Project Implementation

The key to Project start-up success will be the early procurement of the PMU including the key position for the implementation of this SEP, the PMU E&S Officer (or equivalent). The PMU E&S Officer will, as the Project progresses, continue to identify and consult appropriately with key stakeholders including PAP and any vulnerable individuals or groups that may be impacted by the Project.

8.3 Component Consultation

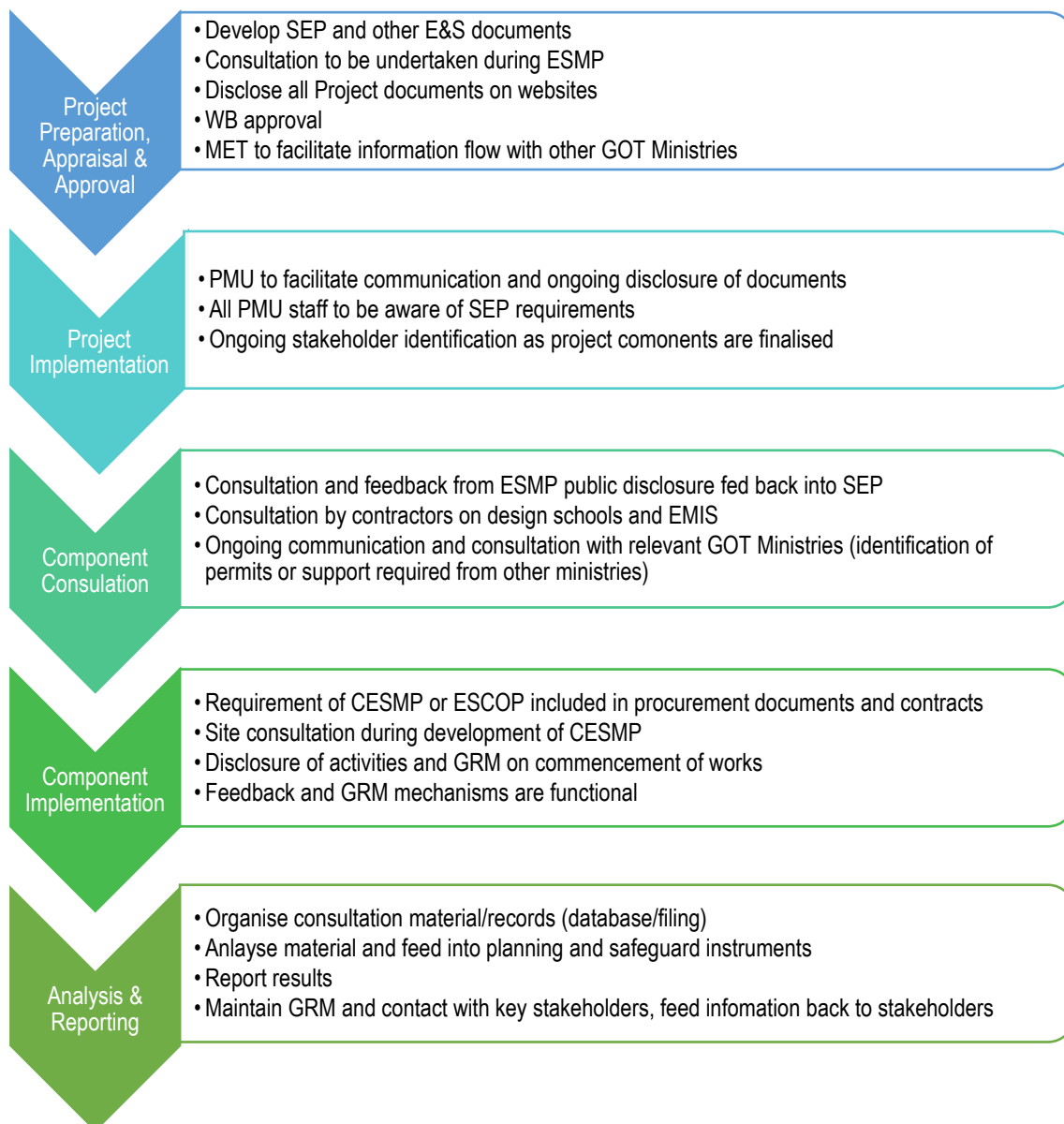
As described earlier this Project does not present significant risks with regards to stakeholder engagement. There has been broad support for the current school's component under PREP and it is envisaged that this will continue for the TSRSP under MET.

Prior to any consultation activity it is advised that a brief Communications Plan (Appendix 2) be developed by the PMU to guide messaging and how that messaging is communicated.

8.4 Component Implementation

During the procurement of contractors for the implementation of component activities it is important that the requirements for stakeholder engagement are clearly defined in the procurement (bidding docs - RFQ, ROI etc). Contractors undertaking construction will be required to develop a Contractors Environmental and Social Management Plan (CESMP - for major works) or an Environmental and Social Code of Practice (ESCOP - for minor works). These documents will clearly indicate the consultation and disclosure activities that will be required by the contractors.

For each engagement the PMU E&S Officer should prepare, or assist contractors to prepare a brief plan for the engagement which will guide the messaging and channels for communication. A template for the Communications Plan has been developed to assist this process and is detailed in (Appendix 2).

Figure 1 Implementation steps for the SEP

9 ROLES AND RESPONSIBILITIES

The MET is primarily responsible for implementation of the Project through the PMU. The following positions will be responsible for the implementation of this SEP:

- The MET PMU PM is responsible for overseeing and coordinating all activities associated with the Project.
- PMU E&S Officer is responsible for implementing this SEP and any associated community engagement activities.
- PMU Procurement Officer and Contract Manager are responsible for communicating proposed contract opportunities to industry and members of the general public that include required E&S obligations.

There are a number of other responsibilities with regards to grievances outlined in Section 8.

9.1 PMU PM

The PMU Project Manager will be responsible to develop and maintain relationships whilst communicating with Government ministries and departments and the media. Media engagements may be required throughout the Project's life and decisions taken as a result of these engagements could potentially impact MET's relationships with communities.

Stakeholder engagement activities may influence the activities of other departments or require their inputs. The PMU PM is to facilitate communication with the managers of other projects, ministries and departments to keep them informed on the stakeholder engagement process. The flow of information from these managers to the PMU PM is also important as activities that they may be undertaking can impact project outcomes and create risk.

9.2 PMU E&S Officer

The PMU E&S Officer needs to manage and facilitate all stakeholder engagement. Responsibilities of the PMU E&S Officer including:

- Manage all stakeholder engagement related activities for the Project and the implementation of this SEP.
- Manage the GRM as described in Section 9.
- Support the development, implementation and monitoring of all stakeholder engagement activities for Project ESMP by external consultants.
- Facilitate the public disclosure of ESMP documents and collate and analyse public responses to these and facilitate changes to ESMP, SEP and any other relevant E&S documents from public comments.
- Facilitate the movement of information between key stakeholders and ensure all relevant documents are disclosed.
- Provide support for any activities that require *ad hoc* or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation).
- Liaise with other WB Project Managers and E&S Specialists/consultants to confirm that stakeholder engagement requirements/protocols are understood.
- Proactively identify stakeholders, project risks, impacts and opportunities and inform the PMU PM to facilitate the necessary planning to either mitigate risk and impacts or take advantage of opportunities.

The PMU E&S Officer needs to remain actively involved with the community development and land acquisition/resettlement planning (if any) and implementation of these activities in order to identify potential risks or opportunities and ensure that appropriate administrative support is provided.

9.3 PMU Procurement Officer and Contract Manager

The PMU Procurement Officer and Contract Manager will be required to facilitate the necessary terms and conditions for E&S commitments in bidding documents and contracts. There is also a need for these positions to manage the opportunities for contracts and contractor's employment as these can become key issues with industry and the community if not seen to be open, fair and transparent. There are sensitivities around local employment and contracting that need to be managed with appropriate messaging. This requires clear and

transparent contracting processes to be adhered to and clearly communicated to the communities.

10 GRIEVANCE REDRESS MECHANISM

A GRM is a locally based, formalised way to accept, assess and resolve community feedback or complaints. The GRM provides important feedback for the continued improvement of projects. The GRM is a process for receiving, evaluating and addressing project-related complaints from communities at the level of project component or activity. The terms complaints⁴ and grievances⁵ are used interchangeably.

The following are the GRM objectives:

- To address complaints and enhance conflict resolution arising from, and during project implementation.
- To provide transparency and accountability throughout the implementation of components/activities amongst the relevant stakeholders including project beneficiaries.
- To resolve any emerging environmental and social complaints/issues at project sites.
- To promote good relations between the project implementers, contractors and beneficiaries.

Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all stakeholders (particularly PAP), at no cost and without retribution. The grievance mechanism is appropriate to the scale of impacts and risks presented by the Project. The GRM does not impede access to other judicial or administrative processes.

This GRM sets out a number of steps to be taken to resolve grievances, the role of different staff members involved and timeframes to reach a decision on grievances. The types of grievances stakeholders may raise include, but are not limited to:

- Negative impacts on communities, which may include, but not limited to financial loss, physical harm and nuisance from construction or operational activities.
- Health and safety risks.
- Negative impacts on the environment.
- Unacceptable behaviour by staff or employees.

It is critical that stakeholders understand that all grievances lodged, regardless of the Project phase or activity being implemented, will follow this process. The GRM described in this section is distinct from the grievance mechanism to be used by the Project's workforce as detailed in the TSRSP Labour Management Procedures (LMP).

⁴ **Complaint:** an expression of dissatisfaction that is related to an impact caused by a project activity, which has affected an individual or group. Adversely, the interests of an individual or group and the individual or group wants a proponent or operator (or contractor) to address and resolve it (e. g. problems related to dust deposition, noise or vibration). A complaint is normally of a less serious nature than a grievance

⁵ **Grievance:** a claim raised by an individual or group whose livelihood, health and safety, cultural norms and heritage are considered to have been adversely affected (harmed) by a project activity which, if not addressed effectively, may pose a risk to the MET Project.

10.1 Principles of the GRM

The following are broad principles of the GRM:

- **Legitimate:** enabling trust from the stakeholders and being accountable for the fair conduct of grievance processes. Accountability for ensuring that the parties to a grievance process cannot interfere with its fair conduct, is typically one important factor in building stakeholder trust.
- **Accessible:** being known to all stakeholders and providing adequate assistance for those who may face particular barriers to access. Barriers to access may include a lack of awareness of the mechanism, language, literacy, costs, physical location and fears of comeback.
- **Predictable:** providing a clear and known procedure with an indicative timeframe for each stage, and clarity on the types of process and outcome available and means of monitoring implementation. In order for a mechanism to be trusted and used, it will provide public information about the procedure it offers.
- **Equitable:** seeking to ensure that complainant has reasonable access to sources of information, advice and expertise necessary to engage in the process on fair, informed and respectful terms. Where imbalances are not redressed, perceived inequity can undermine both the perception of a fair process and the GRM's ability to arrive at sustainable solution.
- **Transparent:** keeping parties to a complaint informed about its progress. Providing transparency about the GRM to wider stakeholders will be important to demonstrate its legitimacy and retain broad trust. At the same time, confidentiality of the dialogue between parties and of individuals' identities will be provided where necessary.
- **Rights compatible:** are consistent with applicable Tongan national recognised rights and customs.
- **Enabling continuous learning:** drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harm.
- **Based on engagement and dialogue:** consulting the stakeholders and focusing on dialogue as the means to address and resolve grievances
- **Consistent:** that all complaints, irrespective of their nature or who makes them are treated the same.
- **Capable:** seeking the necessary technical team to address grievances in a timely manner.

10.2 Confidentiality

Complaints may be made anonymously and confidentiality with the details of complainants being kept confidential in all instances, including when the person making the complaint is known. For this reason, multiple channels (email, phone, web based etc) to make a complaint will be established and conflicts of interest avoided. Specific procedures for Gender Based Violence/Sexual Exploitation and Abuse (GBV/SEA) and Sexual Harassment (SH) including confidential reporting with safe and ethical documentation of GBV/SEA cases will be undertaken through the process developed by the CSU with the Women's and Children's Crisis Centre (WCCC). Details of this mechanism will be included in the CESMPs and ESCOPs when finalised/

10.3 GRM Process

The purpose of the GRM is to address and record any complaints that may arise during the implementation of the project. The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GRM are:

- Settle the grievances via consultation with all stakeholders (and inform those stakeholders of the solutions).
- Forward any unresolved cases to the relevant authority.
- Record, categorize and prioritize the grievances.

10.4 Community Level

Local communities have existing traditional and cultural GRMs. It is expected that some disputes at the community level will be resolved using these mechanisms, without the involvement of the contractor(s), and or Government representatives at local and national levels.

With disputes that include differences between households over land, or boundaries, even on issues triggered indirectly by the Project, the mechanism will involve the Town Officer, landowner(s) concerned, and if required, the representative from the MLNR and MET.

It is expected that any land dispute issues pertaining to the Project would be resolved at this level given the nature of land ownership and the significant authority vested under the MLNR.

Where issues caused by the project are raised and resolved through these existing community level mechanisms, it is important that a mechanism for reporting them to the MET is established. MET will record all complaints/outcomes, and if it involves land disputes, the MLNR will lead and record all complaints/outcomes.

10.5 Project Level

Many Project related grievances will be minor and site-specific, and can be easily resolved on-site by the Contractor's Site Supervisor (CSS). They usually revolve around nuisances generated during construction such as obstruction of access, noise, dust, vibration, workers dispute's etc. On-site grievances that are easily resolved still need to be communicated to the PMU E&S Officer for recording, including how the dispute came about and how it was resolved. However, some complaints are likely to unresolved on site. The CSS will then inform the PMU E&S Officer and the formal GRM will be activated.

The PMU E&S Officer will, where possible, request the complainant to fill out the grievance form (Appendix 3), and on receipt of each complaint, note the date, time, name and contact details of the complainant, and the nature of the complaint in the Complaints Register (Appendix 4). The PMU E&S Officer will inform the complainant of the formal receipt of the complaint utilising a standard response letter (Appendix 5) and a timeframe for a response. In the first stage of the GRM the PMU E&S Officer will endeavour to address the issue with direct discussions with the complainant. Should the PMU E&S Officer not be able to resolve the complaint to the satisfaction of the affected persons, it will then be elevated to the PMU PM. The PMU PM and E&S officer will develop a Plan of Action (POA) to resolve the issue and communicate this back to the complainant for resolution. At all stages the complainant must be kept informed about the course of action being taken within a period of two weeks from the

date that the complaint was received. If it's a land related issue, the PMU PM will inform the MET CEO who will consult the CEO MLNR on how best to proceed.

If the complaint is not resolved by the PMU PM to the satisfaction of the complainant, it will then be referred by the MET CEO to the PSC. The PSC will be supported by the PMU to inform and advise. The PSC is required to address the concern within 1 month. The PMU E&S Officer will draft a revised POA to resolve the issue based on the PSC determination and take this POA to the complainant for resolution.

Should measures outlined in the POA fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the Ombudsman's Office for mediation and a decision by the Ombudsman. For land issues, it would be advisable for the complainant to take his/her issue to the Minister of MLNR for a final pronouncement.

It is rare for a complaint to be unresolved after the Ombudsman's decision or for MLNR's resolution to be taken further. If the complainant does not accept any resolution at this stage, the GRM will not impede complainants' access to the legal system. At any time, the complainant may take the matter to the appropriate legal or judicial authority as per the laws of Tonga. Complainants can also access the WB Grievance Redress System (GRS).

To promote the GRM tool, signs must be erected at the sites of all works providing the public with updated project information and summarising the GRM process, including contact details of the PMU E&S Officer. Anyone will be able to lodge a complaint through a number of methods (including the complaints form, in person, by telephone, via the web in either English or Tongan). The PMU must provide a GRM that makes every effort not inhibit the lodgement of a complaint.

The Complaints Register (Appendix 4) will be maintained by the CSU and PMU E&S Officer, who will log the details. This information will be included in PMU progress reports to the WB.

Contact details for the GRM are:

Web: <http://www.finance.gov.to/csu/complaints>

Address: Level 4, National Reserve Bank of Tonga, Nukualofa, Tonga

Phone: Ucall +676 28550

Digicel +676 68528550

Email: csu@finance.gov.to

Table 3 GRM summary at Project Level (Figure 1 illustrates the steps for the GRM)

Stage	Process	Duration
1	The complainant can take his/her grievance directly to the CSS (if relevant) who will endeavour to resolve it immediately. If not satisfied with the onsite solution, the CSS will refer them to put in a formal grievance to the PMU E&S Officer (or the CSS can offer to do this on their behalf by using a complaints form, Appendix 4). For complaints that were satisfactorily resolved by the CSS, the PMU E&S Officer must be informed to log the grievance and the actions that were taken.	Anytime
2	On receipt of a formal complaint, the PMU E&S Officer will respond (standard letter Appendix 5) and endeavour to resolve it within 2 weeks of receiving the complaint.	Within 2 weeks
3	If the matter cannot be resolved by the PMU E&S Officer, he/she then notifies PMU PM and they develop a POA (Appendix 6) to resolve the issue. The complainant must be notified that as a result of the PMU E&S Officer and the complainant failing to	Within 2 weeks

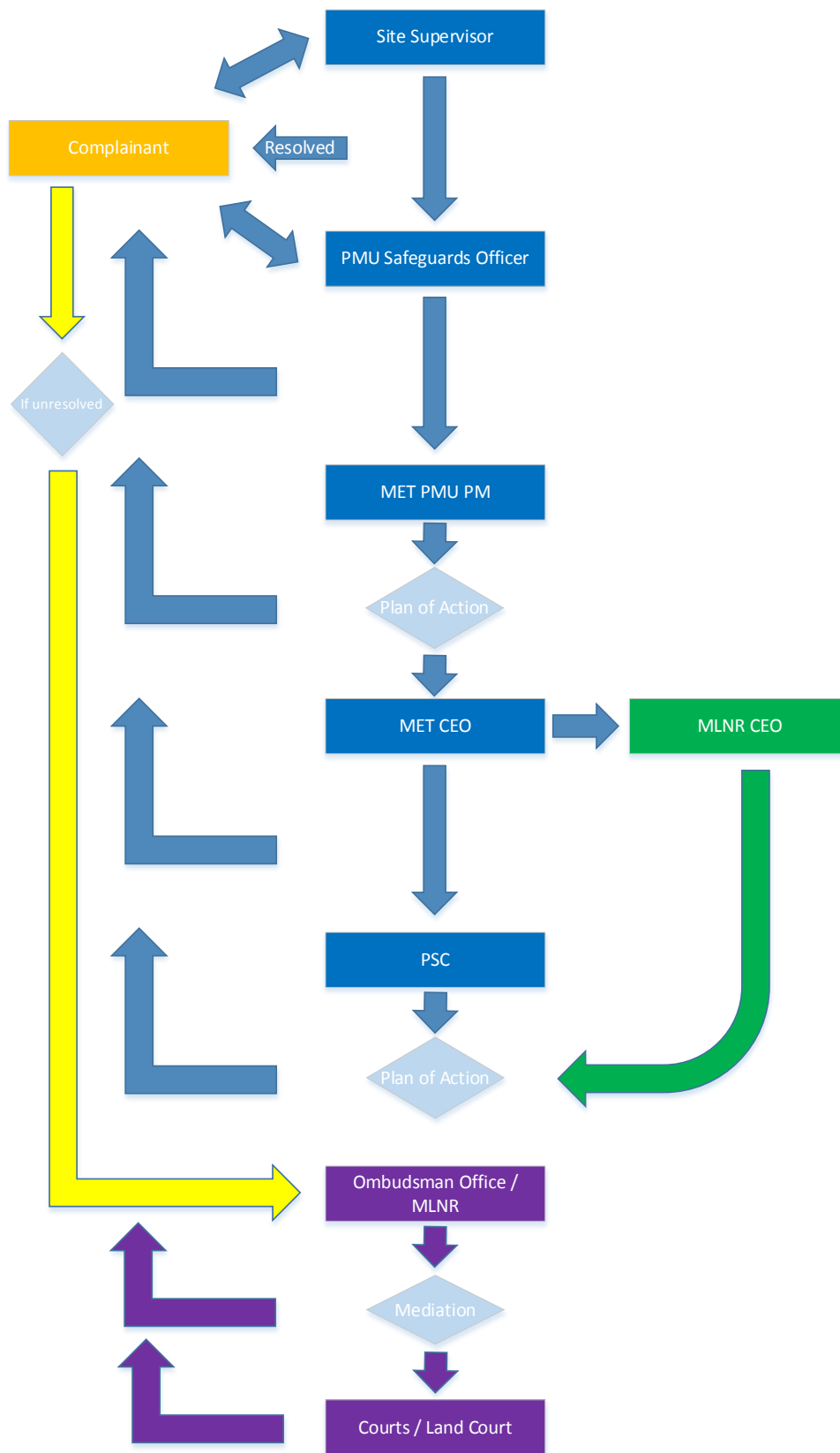
Stage	Process	Duration
	resolve the issue it will be elevated to the PM and another two weeks for the development of a POA will be required. If it's a land issue, the PM will advise the MET CEO, to engage the MLNR	
4	If the complainant is not satisfied with the POA, the MET CEO, will refer to matter to the PSC for a resolution. The PSC with the PMU E&S Officer and PM will develop a revised POA to resolve the issue. The complainant must be notified that as a result of the PMs and the complainant failing to resolve the issue it will be elevated to the PSC and 1 month for the development of a revised POA will be required	Within 1 month
5	If the complainant is dissatisfied with the outcome proposed in the POA, he/she is free to refer the matter to the Ombudsman's Office	Anytime
6	If the issue remains unresolved through the Ombudsman's decision or the Minister of Lands decision, then the complainant can take the matter to the Courts or Land Court respectively to deliberate. Any such decisions are final. The complainant can also access the WB GRS (Appendix 7) if they have a specific grievance related to WB projects.	Anytime

11 MONITORING, EVALUATION AND REPORTING

Monitoring and evaluation (M&E) will be undertaken as a part of overall Project implementation. Specific key indicators for the SEP should be incorporated into the Project Operations Manual (POM) which will include how stakeholders can provide feedback.

Activities related to the SEP should be reported in the E&S section of the normal reporting cycle for the Project as determined in the POM. Any key indicators for the SEP have been incorporated into the M&E framework for the Project.

Figure 2 GRM Steps



APPENDIX 1 PROPOSED WORDING FOR THE PROJECT WEBSITES

Tonga Safe and Resilient Schools Project (TSRSP)

To enhance the safety and resilience of selected educational facilities, and improve the effectiveness of selected educational programs in Tonga, the **World Bank** is providing funds under IDA19 for the Tonga Safe and Resilient Schools Project (TSRSP – P174434). The implementing agency will be the Ministry of Education and Training (MET). The project will include the following four components, with funding to be refined during project preparation:

- 1. Improving Multi-hazard Resilience of Education Facilities**
 - 1.1. Resilient Infrastructure Investments
 - 1.2. Strengthening Education Infrastructure Planning and Maintenance
- 2. Establishment of Education Management Information System (EMIS) and improved quality of teaching**
 - 2.1. Establish a comprehensive EMIS to inform policy decision making
 - 2.2. Upgrading curricula and assessments
- 3. Contingent Emergency Response Component (CERC)** - unallocated project funds may be requested for re-allocation to support response and reconstruction in case of a major crisis or emergency.
- 4. Project Management**

For further information or feedback please contact MET CEO metceotonga@outlook.com

APPENDIX 2 COMMUNICATION PLAN

The purpose of the Communications Plan template is to guide strategic thinking through the communications planning process. Specifically, prior to implementing communications, we should understand the purpose and desired outcomes and actions we want to see, who our target audience(s) is/are, the different channels we want to use to reach our audiences, and to understand what risks exist. The tool helps us to plan our activities step by step and provides a shareable document for coordination.

The tool can be filled out in bullet form for simple communications activities and can be expanded for larger communications campaigns with multiple audiences, messages, and materials. The tool is to guide engagement activities.

1 INTRODUCTION

- Provide a brief introduction/overview on the Component and activity this Plan is addressing.

2 PURPOSE

- Describe the purpose of the communications activity. Why we are doing this communication.

3 OBJECTIVES

- What are we trying to achieve?

4 RISKS AND MITIGATION

- List any risk(s) involved in this communication
- Suggest mitigation measure(s) to address the above risk(s)
- Answer the question: What could prevent this communication activity from achieving its desired outcome? Could the communication activity trigger an undesired response?

4.1 Key Stakeholders, Message and Channel

- List your key stakeholders for this engagement
- List your key messages that you will use in your engagement
 - Where possible, test your messages with a test audience
- List the means to which the messages will be communicated (channel):
 - Describe the different channels used to achieve the desired outcomes based on analysis of the target audiences -answers the question: How do we communicate with each target audience?
 - Describe how each channel will be used.
 - Where possible test your communications channel to see if it is effective

Example table to be used

Stakeholder	Key message	Channel	Frequency	Feedback mechanism

5 Frequently asked questions

- List out what you expect to be the FAQs from the audience
- List out standard responses for your FAQs

6 ROLES and responsibilities

- List out those people and organisations responsible for implementing this Communications Plan

APPENDIX 3 COMPLAINT FORM

Name of Person Making the Complaint <i>(information is optional and always treated as confidential)</i>				
Address or contact information for Person Making the Complaint <i>(information is optional and confidential)</i>				
E-mail Phone Address				
Location where complaint/problem occurred <i>(write in)</i>				
Category of Grievance:				
<input type="checkbox"/> Environmental safeguards, including waste, noise, dust and water runoff/pollution	<input type="checkbox"/> Social Safeguards including gender, labour, community health and safety (including traffic) and child safety	<input type="checkbox"/> Grievances regarding worker health and safety and behaviour of workers on-site	<input type="checkbox"/> Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns	<input type="checkbox"/> Grievances regarding abuse of power/intervention by project or government officials
<input type="checkbox"/> Other (describe)				

Brief Description of Complaint *(provide as much detail and facts as possible attach additional pages if required)*

Please include any other information that you consider relevant, other matters or facts, including supporting documents *(attach additional pages if required)*

Do you request that identity be kept confidential?

Yes

No

Have you previously raised your complaint with the on-site Manager or others?

Yes *(if YES, please provide the following)*

- When, how and with whom the issues were raised
- Please describe any response received from and/or any actions taken by the NCU level grievance mechanism. Please also explain why the response or actions taken are not satisfactory

No *(if NO, why not?)*

Complaint Recipient			
<i>(If Authorized Representatives are not complainants themselves, their names will be disclosed as needed, in order to ensure transparency)</i>			
Name	Position/Organization	Contact number	E-mail address

Signature of the person making the complaint

Signature

Date:

Please send the complaint to

Grievance Redress Mechanism

PMU *(insert appropriate Project and address)*

Email *(insert appropriate Project and address)*

Phone *(insert appropriate Project number)*

Complaints may be submitted by, e-mail or hand delivery

APPENDIX 5 GRM STANDARD RESPONSE LETTER



MINISTRY OF EDUCATION AND TRAINING
Government of Tonga

Reference No.: Type reference number

Date: Type the date

Type recipient's name.,

Type recipient's title.,

Type recipient's address.

Type the salutation,

Re: *Your complaint received regarding insert date and issue*
Your complaint received regarding insert date and issue

Type body of letter.

“All correspondences shall be as courteous, brief and concise as possible. Simple and everyday words shall be used where possible. Previous relevant correspondences or any relevant law, regulation, ruling shall also be quoted” (PSC Policy Manual, 2006)

Thank you for your *visit, letter, email, telephone call* of *insert date*. We welcome and appreciate all feedback regarding our project. Please be assured that we will investigate the issues you have raised and provide you a written response within 2 weeks. We may contact you during this period for additional information.

Until then if you require any further assistance do not hesitate in contacting *insert PMU Safeguard Officers name and contact details* who will be very happy to assist you.

Type closing,

Type your name

Project Manager TSRSP

APPENDIX 6 GRM PLAN OF ACTION (POA)

Complaint # *(from the complaints log)*

Name and details of complainant

Date complaint received

Date GRM PoA completed

Date Plan discussed with complainant

Nature of complaint *(brief description)*

Proposed Solutions

Consultation with the complainant *(detail date and discussions had with complainant and other stakeholders in developing the solutions).*

Signature of Complainant *(accepting the proposed solutions)*

Signature of on-site Supervisor *(acknowledging implementation of the solutions)*

Signature of PMU Safeguards Officer *(GRM Focal Point)*

APPENDIX 7. WORLD BANK GRIEVANCE REDRESS SERVICE

What is the GRS?

The World Bank's **Grievance Redress Service (GRS)** provides an additional, accessible way for individuals and communities to complain directly to the World Bank if they believe that a World Bank-financed project had or is likely to have adverse effects on them or their community. The GRS enhances the World Bank's responsiveness and accountability by ensuring that grievances are promptly reviewed and responded to, and problems and solutions are identified by working together.



The World Bank is committed to ensuring that Bank-financed projects do not harm people or the environment. The objective of the Grievance Redress Service is to make the Bank more accessible for project-affected communities and to help ensure faster and better resolution of project-related complaints.

For more information: <http://www.worldbank.org/grs>
email: grievances@worldbank.org



GRIEVANCE REDRESS SERVICE

Helping individuals and communities
get faster and better resolution
of their complaints



Which complaints can the GRS handle?

The GRS accepts complaints that are:

- related to an active World Bank-supported project (IBRD or IDA)
- filed by a person or community who believes they have been adversely affected by a World Bank-financed project
- filed by a bidder or potential bidder about the procurement process on a World Bank-financed contract

What information is needed?

Complaints must:

- identify the project subject of the complaint
- clearly state the project's adverse impact(s)
- identify the individual(s) submitting the complaint and whether confidentiality is requested
- specify if the complaint is submitted by a representative of the person(s) or community affected by the project
- if the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative

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.

The identity of complainants will be kept confidential upon request.

How is a complaint handled?

GRS receives complaint

- Notifies receipt
- Determines eligibility

Within 10 days

- Notifies eligibility, or ineligibility, if applicable
- Requests additional information, if necessary

Proposed solution

- Solution is proposed to complainants within 30 days
- If complainants agree, Project team implements and GRS monitors
- Complainants are referred to other complaint mechanisms, if not resolved

How can I submit a complaint?

The GRS accepts complaints in English or the official language of the country of the person submitting the complaint. Submissions to the GRS may be sent by:

Email: grievances@worldbank.org
Fax: +1-202-614-7313

Letter: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA

What about other grievance mechanisms?

Affected citizens and communities should use existing project-level grievance mechanisms where possible.

The GRS does not replace other existing accountability mechanisms of the World Bank. Requests can be submitted to the Inspection Panel to determine compliance with World Bank policies (www.inspectionpanel.org).

If a project is funded by the World Bank as well as the International Finance Corporation (IFC) or the Multilateral Investment Guarantee Agency (MIGA), the GRS will refer complaints related to the IFC/MIGA portions of the project to the Office of the Compliance Advisor (CAO) (www.cao-ombudsman.org).

Complaints involving issues related to fraud or corruption in World Bank-financed projects should be reported to the Office of Institutional Integrity (INT) (www.worldbank.org/integrity).

Frequently Asked Questions

Why use the GRS?

The process established by the GRS helps affected individuals and communities engage with the World Bank and the project executing agency to address issues as they happen, for faster and better resolution of complaints.

Does filing a complaint stop a project?

Submitting a complaint does not in itself stop a project.

Is there a statute of limitations for making a complaint?

The GRS will attempt to help resolve every eligible concern in active projects. The GRS cannot review issues related to closed projects.

What is the relation of the GRS to project-level grievance mechanisms?

Project-level grievance mechanisms remain the primary tool to raise and address project-related grievances. The GRS seeks to help resolve issues that cannot be resolved at the project level or where there is no project-level grievance mechanism.

What outcomes can we expect from using the GRS?

Resolution of each complaint depends on the issues at hand. The World Bank will make every effort to resolve all issues in a timely manner, working with the project and affected individuals/communities.

What is the relationship to the Inspection Panel?

There is no sequential relationship between the GRS and the Inspection Panel. The GRS is an additional mechanism for individuals and communities to use. The use of the GRS does not restrict access to the Inspection Panel.