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Directorate of Technical Education

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PROJECT GRM MANUAL

**Accelerating and Strengthening Skills for Economic Transformation
(ASSET)**

Project ID no: P167506

**Technical and Madrasah Education Division (TMED)
Ministry of Education (MoE)**

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Project GRM Manual

Introduction

The Project Grievance Redress Mechanism (GRM) is an instrument for addressing grievances and complaints received from the project affected persons due to environmental and social issues of the project activities. Grievance Redress Mechanism (GRM) is a valuable tool which will allow affected people to voice concerns regarding environmental and social impacts for ASSET's activities. It also provides an avenue to raise issues, concerns and feedback on the project. ASSET would ensure that grievance redress procedures are in place and would monitor those procedures to ensure that grievances are handled properly. The ASSET office will establish a GRM procedure to answer sub-component -related queries and address complaints, disputes, and grievances about any aspect of the sub- component, including disagreements regarding the assessment and mitigation of environmental and social impacts.

Project Development Objectives (PDO)

The Project Development Objective (PDO) is **'to equip Bangladeshi youth and workers, including women and the disadvantaged, with skills demanded for the future of work and improved employment prospects.'**

Skills demanded for the future of work here refer to (i) skill areas for emerging occupations in priority areas identified by training providers; and (ii) skill areas identified by partner agencies in their sectors.

Equip refers to improving the quantity and quality of skills that individuals possess.

The disadvantaged refers to people who face significant social or economic vulnerabilities, including low-income workers, unemployed youths, people with disabilities, ethnic minorities, and microenterprise owners and workers.

The PDOs will be measured by the following outcome level indicators, and will be achieved over a 5-year period through a multi-stakeholder's coordination approach:

- i. Employment rates of graduates from project-supported short courses (30% for female)
- ii. Employers' satisfaction level with the skills of graduates from project-supported diploma programs (15%);
- iii. Total number of vulnerable women and disadvantaged (including PWD, ethnic minorities) employed (trained, as a sub-indicator) (30% of female);
- iv. Total number of trainees trained for skills needed for future of work (40 % of female)

Corporate results indicators to be included are (i) teachers trained and (ii) students benefiting from direct interventions to enhance learning. Both will be included as intermediate results indicators.

Project Location

The location of the ASSET project would be spread over all the districts and most of the sub-districts and would be located within the existing premises of the different training and skill development institutions of the implementing partners. The type of institutions are Polytechnics, other technical institutes,

Technical School & Colleges (TSCs), Institutes of Marine Technology (IMT), Textile Institutes, Technical Training Centers (TTCs), Textile Vocational Institutes (TVIs), Bangladesh Industrial and Technical Assistance Center (BITAC), Vocational Teacher Training Institute(VTTI),Engineering Staff College of Bangladesh(ESCB),Small Cottage Industries Training Institute (SCITI), Industry Skills Councils (ISCs), Institute of Health Technology, Medical Assistant Training School and some local NGOs to be associated through Competitive Institutional Grant (CIG).

The Implementing Agency of the Project

The Directorate of Technical Education (DTE), Technical and Madrasah Education Division (TMED), Ministry of Education (MoE) will be the lead Implementing agency /of the project. The project will be implemented by the cross -ministry team. The Lead Implementing agency (LIA), DTE, will be responsible for the implementation of the project activities, and fiduciary management and safeguard compliance for all the sub -components. Bureau of Manpower, Employment and Training (BMET) of Ministry of Expatriate Welfare & Overseas Employment (MoEWOE), Directorate General of Medical Education (DGME) /of Medical Education and Family Welfare Division (MEFWD) of Ministry of Health and Family Welfare (MoHFW) and Ministry of Industries (Moi) will be the partner Implementing agencies (PIAs) of the project. The PIAs will be implementing the sub-components /activities that are relevant to their respective areas/institutions under the overall management by the led agency.

The stakeholders for the project are categorized as follows:

Project affected parties, interested parties, disadvantaged groups and vulnerable group. The primary stakeholders include all directly affected persons such as title owners losing land, physically displaced people living on their own land, squatters residing on the potential construction sites, students, teachers, and indirectly affected persons and communities/host institutions. The secondary stakeholders are NGOs, community-based organizations, community development projects, governance agencies, development partners, media, community leaders, civil society, traders, construction laborers and consultants in the project area.

Overview and Scope.

ASSET will establish and will follow a Grievance Redress Mechanism (GRM) for answering queries, receiving suggestions and addressing complaints and grievances likely to raise in the project cycle including identification, planning, design and implementation. The GRM spans the entire implementation period and will cater to both the beneficiary communities and the directly and indirectly affected population including the teachers, staff and students. Though the GRM is proposed here, a mechanism of redress has been designed to address environmental and social problems identified during implementation, it will also cater to manage any disconnects that emerge from the site level and that has significant implications for effective implementation of the project interventions. Where project intervention areas cover beneficiaries from the small ethnic communities, project GRM will integrate traditional grievance management system available with the small ethnic communities.

The GRM will assist the PMU to ensure that deliberate processes and procedures are put in place to capture, assess and respond to concerns from project beneficiaries, project executors and the general public during the implementation of the Project. This will ensure smooth implementation of the projects and timely and effectively addressing of the problems that would be encountered during implementation.

Objectives of Grievance Redress Mechanism (GRM).

1. Establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints, feedback or grievances from the stakeholders.
2. The overall objective of the GRM is therefore to provide a robust system of procedures and processes that provides for transparent and rapid resolution of concerns and complaints identified at the local level.
3. Ensure proper documentation of complaints, feedback or grievances and any corrective action taken; and
4. Contribute to continuous improvement in performance of the project implementation through an analysis of trends and lessons learned.

GRM Structure (including GRCs at various Levels) and Responsibilities

The following table illustrates the various GRC structure, their responsibilities and timeline:

Level	Organogram	Role	Timeline
Tier 1 – Local GRC	1. Institution Head -1(Convener) 2. Focal Point from Implementing Institution/Industry Partner -1(Member Secretary) 3. Teacher/Representative from Implementing Institution/Industry Partner -1(Member) 4. Local Ward Councilor -1(Member) 5. Representative from Local women's Group - 1(Member) 6. Representative from PAP Group-1(Member) 7. Women representative from UP/WC (In case PAP is female)-1 (Member) GRC Uptake Staff At least one will be a female member. She may be posted to subproject sites.	Uptake Staffs: • Maintain and implement GRC uptake channels (Phone, SMS etc.) • Log in grievances and provide tracking number • Receiving grievances for logging forwarded from other Tiers • Intimating progress to Complainant • Keeping and maintaining Logbook and files • Submit quarterly progress Report to Tier 2 Local GRC: • Ensure GRM is publicized locally • Screening against eligibility criteria (If admissible or not) • Carryout inquiry on eligible grievances • Arrange to solve simple complaints informally • Consult with Contractors and other parties against whom complaints have been launched and mediate, if feasible • Carryout GRC meeting and provide final decision on complaints • Forward complaints to Tier 2 if Complainant is not satisfied with resolution • Refer to Legal and law Enforcement Agencies, NGO if deem fit • Carryout local stakeholder consultation quarterly • Provide GRM related training to staffs • Monitor GRM progress	Uptake to Initial Feedback on eligibility and next course of action = 48 hours Eligibility acceptance to Tier 1 Resolution = 16 days
Tier 2 – PMU Level GRC	1. Project Director (Convener) 2. Additional Project Director, ASSET-Member 3. Director, Admin. DTE, (Member) 4. Deputy Director-3, ASSET (Member & Focal Person) 5. Attached Officer (Operation)- Member 6. Gender Specialist-Member 7. E&SSS, (Member Secretary)	• Develop GRM policy and implement • Train staffs on GRM Procedure and provide guidance incl SEA/SH GRM • Provide logistics to various GRCs • Develop and maintain various uptake channels • Monitor GRM progress of the Project • Compile GRM database and share with World Bank and PMU (GRM Aggregator) • Carryout field visits • Provide resolution to complaints forwarded from Tier 2 GRC • Ensure Telephone/SMS receivers receive complaints and forwards to Tier 1 GRC and keep log of complaints • Carryout high-level stakeholder consultation • Maintain database of all GRC members at all Tiers • Be responsible for addressing SEA/SH issues	Receive from Tier 1 to Resolution = 30 days

GRM Process (Uptake, Investigate, Response, Closure)

The Project GRM process will be followed as under. This will be tested in the field and may be changed depending on practicality.

Stage	Activities	Responsibility	Timeframe
Uptake	Carryout activities listed as per GRM Uptake Channel paragraph. If complaint not eligible as decided by first tier intimate the Complainant and refer him/her to Legal/Law Enforcing Agency/NGOs etc. if the complainant desires If eligible, Tier 1 will begin their activities	The Uptake staffs assigned at each field office. If complaint is received via telephone, SMS, Website and email these will be referred to the uptake staffs of that specific field office where the complaint originates who will record, assign tracking number and follow Activities 1 and 2.	The Complainant will be informed if the complaint is legible or not within 48 hours
Screening for Eligibility (Just after uptake)	After receiving complaints Tier 1 GRC will test complaint for eligibility. The eligibility will be informed to Uptake Channel staffs	The Tier 1 GRC will be responsible to inform Uptake Channel staffs of eligibility	Eligibility will be intimated to Uptake Channel Staffs in less than 48 hours
Complaint Assessment	If the initial assessment establishes the eligibility of the complaint to be pursued, a further assessment is recommended of the seriousness of the complaint—classified in terms of high, medium, or low—and its impact on both the complainant and the project. Criteria for classification include the following: • severity of the problem, • potential impact on the well-being of an individual or group, • potential impact on the project, and • public profile of the issue. Additional data collection through field visits to the sites, discussions and interviews with Complainants and other relevant persons or groups in the community, and cross-checking the information already provided will be required. This phase is an investigation phase	Tier 1 GRC	3 working days from eligibility intimation to Complainant of a solution/ option
Formulate a Response	Having completed the complaint assessment, a response along with options will be formulated on how to proceed with the complaint for solution. This response should be communicated to the complainant. The response should include the following elements: • acceptance or rejection of the complaint • reasons for acceptance or rejection • provide an initial solution including options • a time frame; and • further documents or evidence required for • investigation, if required. In case further evidence is required, the GRC will carry out further investigation with new evidence and repeat the process above	Tier 1 GRC	3 working days from option intimation to agreement with the Complainant about solution
Implementing the Solution (if accepted)	If Complainant agrees with the solution the GRC will settle grievances through: • requesting the relevant agencies responsible for the grievance to take appropriate measures to remove the cause of grievance (e.g., contractors to clear access roads or provide alternative roads, clear canals and other irrigation systems, remove garbage, warn workers or take disciplinary measures against workers etc.) • provide timeline for the resolution by the responsible party • signing agreements between Affected Parties (APs) and the GRC for solutions mutually agreed upon	Tier 1 GRC	10 working days from agreement

	- initiating a monitoring process to see if the agreed actions are being implemented or not - After action is completed, intimate the Complainant and get his/her signature in GRM Resolution Satisfaction Form		
Implementing the Solution (if not accepted, or for a complex issue not under Tier 1 jurisdiction)	The complaint will be forwarded to Tier 2 with intimation to the Complainant about timeline. Monitor complain handling process	Tier 1 GRC	2 working days from solution being unaccepted by Complainant
If Tier 1 Solution is not accepted	Tier 2 GRC will repeat complain resolution process mentioned above for Tier 1. Complaint resolution and options will be intimated to Tier 1 by Tier 2 who will interact with the Complainant. Resolution activities will also be coordinated by Tier 2. For complex issues, Tier 2 will directly contact Complainant	Tier 2 GRC	Presentation of solution in 30 working days from receiving complain from Tier 1
Complaint Evaluation	An evaluation system should assess the overall effectiveness and the impact of the GRM. Such evaluations will take place biannually, and their results should contribute to improving the performance of the GRM and provide valuable feedback to PMU. The following questions will be addressed in such evaluations: - How many complaints have been raised? - What types of complaints have been raised? - What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)? - How long did it take to solve the problem? - How many APs have used the grievance redress procedure? - What were the outcomes? - Is the GRM effective in realizing the stated goals, objectives, and principles? - Is the GRM capable of responding to the range of grievances specified in their scope?	All GRC Tiers	Biannually
Note 1: for serious Complaints (GBV, fatality, near misses, hazardous spill etc.) initial reports must be given to PMU and World Bank within 24-hour time - Note 2: Complainant will not be barred from seeking redress from Legal/ Law Enforcement/NGOs. All Tiers of GRC should maintain a good communication network with them, including local Government officials so that Complainant referred to these agencies can be given adequate attention. - Note 3. The above processes should not create incentives for Affected Parties (APs) to seek further redress (e.g., by having the Tier 2 routinely yield more benefits or higher compensation than Tier 1 etc.). The process should not encourage unjustified multiple appeals. - Note 4. GRCs must upkeep Complaint Forms, GRC Review Meeting Form, M&E/Quarterly Report Compilation Form and GRM Satisfaction Forms – both blank and those filled by the GRM process for future references. Filled form must also be saved digitally			

GRM Uptake Channels

There will be several uptake channels for complaints to be received:

Channel	Particular	Timetable	Responsibility
Face-to-Face	There will be a number of field offices, and each field office will nominate an individual to register complaints. He/ She should have a register to note the complaints and complaint forms to fill up. The form will be signed by both the staff and the Complainant.	Will be operated from 9 AM to 6 PM (12 hours) This information must be disseminated to the public	The complaint desk will be manned during working days only. For non-working days, virtual means (SMS, Telephone, email etc.) will be suggested. The field level staff will welcome the Complainant and make him/her comfortable and begin with greetings. The staff will note, fill up the company form (Annex A), get complainant's signature and sign the form him/herself. The Staff will also provide estimated timeline and a tracking number. The Staff will also intimate the first GRC tier for eligibility checking as well as the Central GRC aggregator

			for compilation. After eligibility check by the first tier, the Staff will inform the Complainant if the complaint is eligible to be considered or otherwise. If not eligible, the Complainant will be provided other options (NGO, police, legal etc.)
Telephone	01325-073610	Will be operated from 6 AM to 6 PM (12 hours)	Will be manned by two operators working 6 hours shifts. One female and one male. Will be open 7 days a week, even in Government holidays. Following will be noted (Action 1): Name and address (none required if anonymity sought) Complaint, in summary Nature of Complaints If it is project related. Complaint against, if any Operator will (Action 2): Register the complaint in a register Provide a tracking number Provide a timeline Fill up Complaint Form for filing (Complainant's copy may not be feasible for virtual filing) Intimate the first tier of GRC about the complaint Intimate Central GRC aggregator After eligibility check by first tier, inform the complainant if the complaint is eligible to be considered or otherwise. If not eligible, the complainant will be provided other options (NGO, police, legal etc.)
SMS	01325-073610	Will be operated from 6 AM to 6 PM (12 hours)	Will be manned by above two operators. After SMS is received, Operator will call back and execute above steps
Email	info@asset-dte.gov.bd	Will be monitored as per above timing (12 hours)	Will be operated by the Social Development Specialist/Communication Specialist/ Any other nominated staff of the PMU at Project Office. If no details are given will request number (Action 1) above. If phone number is given, the Complainants will be called to get the above information, else email will suffice. Then the Staff will carry out Action 2 above.
Website	www.asset-dte.gov.bd/GRM	Will be monitored as per above timing (12 hours). The site will provide a format for complaint registration. This will include info required in Action 1 above. The complaint will be redirected to the email above with a Subject GRM From Web – Date and Time.	As above
Letter	Project Director, ASSET Project, Directorate of Technical Education (DTE), F-4/B, 4 th Floor, Agargaon Administrative Area, Dhaka-1207	Will be received and opened during office hours	After the letter is received, the complaint will be studied and if ineligible, it will be intimated to the Complainant including provision of other options. If eligible Action 1 and 2 above will be implemented
Suggestions Box	Suggestion Boxes will be placed in front of every field office	Will remain open round the clock. Will be opened during the beginning of office hours by the staff responsible to register complaints in each field office	As above

Note: To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. PIU will maintain the following three Grievance Registers:

Intake Register: (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

Resolution Register: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

Closing Register: (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

Grievance resolution will be a continuous process in subcomponent level activities and implementation of those. The PIU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank and any other interested persons/entities. The PIU also prepare periodic reports on the grievance resolution process and publish these on the DTE website. The format in Annex C will be used for periodic grievance reporting.

Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) GRM

Some basic definitions:

Sexual exploitation. Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In World Bank-financed operations, sexual exploitation occurs when access to or benefit from Bank-financed goods, works, non-consulting services or consulting services is used to extract sexual gain.

Sexual harassment. Any unwelcome sexual advances, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might be reasonably expected or perceived to cause offense or humiliation to another when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment.

Sexual exploitation and abuse (SEA) versus sexual harassment (SH). SEA occurs against a beneficiary or member of the community. SH occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that PMU policies and staff trainings can include specific instruction on the procedures to report each.

The Importance of Consent in the Handling of SEA/SH Cases

Anyone involved in grievance mechanisms for SEA/SH GRM should remember:

Consent must be informed, which means that the survivor must be aware of and understand what all available options entail. The information provided should be comprehensive, detailed, and communicated in a way which is easy to understand.

Obtaining consent relates not only to the service provision referrals, but also to the utilization of the grievance mechanism itself.

Consent is a process that can change. For example, some survivors may withdraw their consent during the process, possibly to ensure their own safety. Such a choice must be respected.

Consent must always be respected, even when there seems to be little or no risk to the survivor.

The survivor's consent prevails over any person's desire to investigate and understand the truth.

Any information about a survivor's story— even if anonymized—should only be shared if the survivor has given consent.

Consent should be documented: survivors can choose to complete, sign, or fingerprint a consent form specifying their choices regarding sharing information about their cases with other agencies or individuals, including for what purposes. **(See Annex E for a sample consent form).**

Consent must be mainstreamed throughout the mechanism through preestablished safe and ethical information-sharing protocols and systems for recording and storing information.

Obtaining the consent of children is different than obtaining the consent of adults. Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. Special provisions are required for SEA/SH allegations that involve minors, especially given how vulnerable they are, including child-friendly feedback channels and specialized training for staff. Parent or guardian are required to accompany the child.

SEA/SH GRM Process

The following will be the steps to be followed addressing SEA/SH GBV cases:

STEP	FUNCTION	DETAILS
Uptake	Receive SEA/SH allegation through multiple reporting channels established for the project	Project GRM channel will be used. Survivor must be informed that her/his wishes to continue with the case will prevail. Upon receiving the allegation, the survivor will be immediately referred to PMU level GRC who will deal with the case in its entirety, given its sensitivity and requirement of training. PMU GRC will have staff trained and assigned for SEA/SH cases
Sort and process	Document and register allegation	The SEA/SH coordinator at PMU GRC is responsible to document and register the allegation. It can be done over phone, video conferencing or in person (suggested). The coordinator needs to visit the survivor in person immediately after initial documentation, if the survivor consents to proceed with the case and consent for the coordinator to disseminate the four information. The SEA/SH allegation will document only (1) the nature of the allegation—what a survivor says in his or her own words without direct questioning; (2) if, to the best of the survivor's knowledge, the perpetrator is associated with the project; (3) when possible, the age and sex of the survivor; and (4) when possible, information about whether the survivor was referred to services (Health, psychosocial, legal etc.).
	Inform survivors about legal and internal data-sharing obligations	If applicable, the survivor will be informed about any legal obligations to report SEA/SH to the Police. Wherever possible, this information should be delivered to the communities and the survivor prior to the disclosure of any information that could trigger mandatory reporting, both through community awareness-raising activities and by providing information as a first step in the uptake phase. Survivor must consent to share the four nonidentifiable data with PMU and WB. In the absence of consent, there should be absolutely no data sharing, in line with the principle of survivor-centricity.

	Notify the World Bank in accordance with the required reporting protocols	If a survivor gives consent, the SEA/SH coordinator will inform PMU and WB on the four sets of data. Else, only an intimation to the WB and PMU about the survivor's non-consent will be made
Acknowledge and follow-up	Refer the survivor to relevant GBV service providers	<i>Note: A List of various SEA/SH service providers (Medical, psychosocial, legal, livelihood etc.) will be kept at the PMU GRC Coordinator (Annex F).</i> At this stage the survivor will be referred to various service providers. Before referral, the survivor's consent must be documented. This means that the survivor can choose to fill out, sign, or fingerprint a consent form that outlines the survivor's choices regarding whether information about the case is shared and whether the survivor wants to take up the proposed referrals or not.
Verify, investigate and act	Provide support services to survivors	GBV service providers support survivors until their services are no longer needed.
	Review allegation and determine the likelihood that it is project-related	If a survivor wishes to proceed with accountability measures, the SEA/SH Coordinator, with the help of other GRC members/Contractors as appropriate, will determine the likelihood that it is related to the project.
	Implement sanctions for perpetrators in accordance with employment contracts and local labor laws	If SEA/SH allegations are confirmed, the appropriate party—the employer of the perpetrator, which could be the implementing agency, the supervising engineer, or a contractor—implements disciplinary actions in line with labor law, employment contract and Code of Conduct (CoC).
	Resolve and close cases	If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the case can be closed by the coordinator. The SEA/SH GRM Coordinator records the resolution of the incident, the date it was resolved, and marks it as closed. The PMU and World Bank are notified that the case is closed
Monitor and evaluate	Monitor, track, and provide regular reports	The SEA/SH Coordinator is responsible for issuing regular (e. g., monthly/quarterly) reports to the PMU that can only contain data such as the total number of allegations, the number of alleged perpetrators who have a relationship to the project, the type of incident, the age and sex of survivors and the referral status.
Provide feedback	Respond to survivors	The SEA/SH Coordinator needs to provide ongoing feedback to the survivor throughout the process but especially: (1) when the grievance is received; (2) when the case is reported to PMU and WB; (3) when the investigation commences or when a determination is made that there is an insufficient basis to proceed; and (4) when an investigation concludes or when any outcomes are achieved or disciplinary action taken. When an investigation is concluded, the survivor must be informed first to assess his or her safety before the investigation's conclusions are communicated to the perpetrator, particularly when sanctions will be taken.

SEA/SH GRM – Points to Keep in mind

Following issues to be kept in mind while dealing in SEA/SH issues:

ISSUES	DO'S	DON'T'S
Confidentiality	To record SEA/SH allegations, use an encrypted electronic storage system with proper tracing or a separate logbook that will be kept safe and that guarantees the confidentiality of data Create a sound coding system to anonymize case files by, for example, assigning tracking numbers Establish a formal protocol with clear rules and procedures for interagency information-sharing of case-level data to ensure confidentiality	Register the case in a logbook used for other types of grievances Leave information/logbook easily accessible Underestimate the importance of keeping survivor files confidential, even within an organization or with colleagues Discuss survivor files with anyone unrelated to the case or include identifiable data or information about individual cases in interagency reports Include any elements in shared data that could help identify survivors, including names, characteristics, or specific locations
Consent	Document a survivor's consent to receive referrals and for the sharing of any data Depict the benefits and risks of every referral option and clearly relate to the survivor what cannot be provided as well as any limitations on services Adopt a context-sensitive approach for reporting to the police and making referrals to the legal justice system. Security actors and the rule of law may not be reliable in some context; and some survivors may prefer to turn to traditional, informal justice mechanisms	Force a survivor to file a formal complaint with the grievance mechanism (some survivors may only wish to access services) Act on the allegation in any way without the consent of the survivor Coerce a survivor to make a particular decision or create false expectations of available services and support Assume that reporting to the police, accessing legal support or dealing with the justice system is necessarily desirable. (In many cases, survivors do not want to pursue security- or police-related actions, and their decisions must be respected.)

Proactive Approach to Address SEA/SH Issues

The Project should bear in mind that SEA/SH issues are extremely sensitive and single case can jeopardize the project, both operationally and reputationally. Therefore, it is of utmost importance that all project staffs, workers, personnel know the implication of SEA/SH and act accordingly. Following measures should be in place to deter any incidence of SEA/SH in the project (list is not exhaustive):

Ensure Contractor's bidding document and agreement, both reflect issues of SEA/SH, the consequences of SEA/SH by their workers including project fund withdrawal, investigation by law enforcing agencies and risk to their reputation. The agreement must have a SEA/SH non-compliance clause.

Contractor must be responsible for activities of their workers and they should train and monitor their behaviors. All the project workers are bound to sign a Code of Conduct (CoC), illustrating SEA/SH issues, among others.

Workers and labors must be provided with adequate leave and scope of entertainment in the camp.

Training on SEA/SH on a quarterly basis.

Communities must be provided information on lodging SEA/SH complaints through FGD, poster, miking etc.

Signposts and banners in the project site regarding adherence to SEA/SH protocol.

Indication of SEA/SH must be handled with *zero tolerance*.

Interacting with the communities by project staffs and workers should be discouraged and kept to a certain limit and continuously monitored.

Intent to hide cases of SEA/SH by project staffs and worker to save reputation must be curbed.

Training and Capacity Building of GRM Staffs

General. Anyone deployed or assigned in the GRM management role should be given prior training. The following paragraphs illustrate the training modalities.

Orientation. GRM assignment should be viewed as a customer service issue rather than a complaint issue. There will be a marked difference in the way staffs approach their work between those who see the GRM as a “complaints department” and those who see it as a “customer service” department.

- **GRM as “Complaints Department.”** If staffs working in a GRM see their function as addressing *complaints*, then they will likely assume that every interaction will be unpleasant and be on the defensive in conversation with an affected person (AP). This orientation emphasizes the negative aspects of the process affecting performance, morale, and expectations all around.
- **GRM as “Customer Service Department.”** By contrast, if GRM staffs view a GRM as an integral part of effective project management, through which the PMU seeks feedback from “customers” or “beneficiaries,” then they will be far more likely to approach their work positively. Also, if people are asked not only what they *do not like* about the project, but also what they *do like*, then their responses are more likely to be moderate about any negative impacts in most cases.

Knowledge. Three types of knowledge are especially important to staffs operating within a GRM:

- **Knowing the context**—understanding of background issues, politics, sensitivities, precedents, local history, language, and culture of the APs;
- **Knowing the facts**—having detailed information related to the project and to any cases associated with it; this includes specifics on the risks, impacts and benefits of the project, who is affected, and knowledge of relevant criteria (e.g., laws, costs, valuations); and
- **Knowing the system**—experience in dealing with people, organizations, procedures, and cases; staffs should be familiar with the process, purpose and objectives of GRMs, the guiding principles governing treatment of APs, relevant legislation, one’s own role in the process, and the limits of GRMs.

Staff Skills. The following is both a list of the skillsets essential to dealing effectively with APs and recommendations for the development of training tools designed to facilitate those practical training opportunities:

- **Negotiation, Influence, and Conflict Management.** Every interaction with an AP who has a grievance is a negotiation—a conversation in which parties are attempting to influence each other. Skills in the art and science of negotiation, influence, and conflict management are essential in dealing with grievances effectively, in particular the art of negotiating substantive or technical issues in ways that (a) allow decisions to be based on appropriate, legitimate criteria; (b) preserve manageable relationships even while there might be disagreement over issues; and (c) explore options and alternatives to reach mutual agreements where possible.
- **Options Analysis.** Understanding how people see (from their own perspective) the choices/options they are being given is essential to understanding why they might behave in certain ways. Staffs need to understand how choices look to others, for the purpose of influencing them more effectively.
- **Brainstorming and Joint Problem Solving.** While some issues affecting APs are often emotional, there are also technical, non-emotional matters that must be dealt with in GRMs. These include determining responsibility, assessing the validity of claims, determining how policies apply in a case, and valuation. To turn conversations about grievances into productive problem solving, it is useful to have the capacity to engage APs in

brainstorming about constructive ideas and to design and manage processes for joint problem solving (engaging both project staff and APs—and possibly other resource people).

- **Communication.** Several specific communication skillsets that will help most GRM staff deal with grievances are the following:
 - ***Inquiry and Active Listening.*** The most basic, and essential, communication skills for anyone dealing with grievances are the skills of inquiry (asking good questions) and active listening (listening to people with the intent of understanding what they mean, as well as hearing what they say). Most APs want to be listened to, in addition to having their substantive complaint addressed.
 - ***Understanding Perceptions.*** It is also essential for project staff to be aware that different people, for very logical reasons, will often have very different perceptions of an event, a policy, or other people. It is often vital to turn the type of communication being used into something more constructive, particularly dialogue—a conversation where people are making the effort to understand each other, even if they might strongly disagree.
 - ***Difficult Conversations.*** It will be helpful for any staff working within a GRM to realize that every difficult conversation is actually three conversations. *First*, there is the “factual” conversation: the technical details of what happened, is happening, or will happen. *Second*, there is also an “emotional” conversation, which is the conversation about how people feel about what is happening. And *third*, there is the “identity” conversation, which is the impact that the conversation (or dispute) has on their sense of “who they are” and how they are being treated. It is possible to build the capacity of project staffs and others in a set of skills that can actually help them to have difficult conversations in ways that are more productive (and less destructive).
 - ***Feedback.*** Grievances are fundamentally a form of feedback given about a project by those affected by it, and they should be treated as such. Staffs need to know how to give and receive (and to help others give) feedback effectively and in ways that maximize how helpful that feedback can be.
- **Facilitation.** Many project-related grievances will be common to many APs and will involve multiple stakeholders. It will be essential for GRM staffs to have facilitation skills so that they can better manage the communication, the collection of information, any option generation, the exploration of alternatives, and/or the making of any commitments consistently and effectively in group settings.
- **Risk Management.** While staffs are trying to address APs’ concerns, they must also be aware of the risks inherent in doing so. These risks include legal liabilities, reputational damage to the organizations or projects they represent, physical harm to people and/or property, raising expectations, undermining colleagues or previous decisions, and setting precedents that might be used later (i.e., avoiding inconsistency, which will undermine credibility).
- **Credibility and Relationship.** The staffs dealing with APs will need to have a minimum of credibility with them, meaning that the APs have some confidence that the staffs will treat them with dignity and respect (as customers) and be able to deal professionally with their case (even if the APs do not like the outcome), and that the APs can believe what they are told by that staff, and that it is authoritative.

Tentative Training Plan

Module	Attendee	Frequency	Responsibility
Project Details (Objective Scope, risks, impacts, Project Affected People)	Everyone associated with GRM	Before beginning of implementation. Thereafter yearly once	Project Director
GRM Process including SEA/SH GRM	Everyone associated with GRM, including SEA/SH issues	Before deployment of GRM and thereafter once half yearly	Environmental & Social Safeguard Specialist (E&SSS) and Gender Specialist
Negotiation, Active Listening and Conflict Management	Everyone associated with GRM	Before deployment of GRM and thereafter once half yearly	Environmental & Social Safeguard Specialist (E&SSS)
Problem Solving Skills with exercise/ case study	Field Office GRM Staffs	Before deployment of GRM and thereafter once half yearly	Environmental & Social Safeguard Specialist (E&SSS)
Exercise - Testing GRM Uptake Channels and GRM Solution	Everyone associated with GRM	Before deployment of GRM	Environmental & Social Safeguard Specialist (E&SSS)

GRM Public Communication Channel

The GRM will be widely publicized among stakeholder groups such as the AP, government agencies, NGOs and civil society organizations. Lack of knowledge about GRMs results in people not approaching and using them, and they eventually lose the relevance and the validity of the purpose for which they were created. People will also be informed about their options, depending on the types of complaints, but should not be encouraged to submit false claims. Criteria for eligibility need to be communicated. An effective awareness campaign launched to give publicity to the roles and functions of the GRMs should include the following components:

Scope of the project, planned phases, etc.

Purposes for which the different GRMs can be accessed, e.g., construction-related grievances, land acquisition and compensation-related grievances, SEA/SH etc.

Types of grievances not acceptable to the GRM

People who can access the GRM

How complaints can be reported to those GRM and to whom, e.g., phone and SMS, postal and email addresses, and websites of the GRM as well as information that should be included in a complaint

Procedures and time frames for initiating and concluding the grievance redress process

Boundaries and limits of GRM in handling grievances; and

Roles of different agencies such as project implementors and funding agencies.

A variety of methods will be adopted for communicating information to the relevant stakeholders:

Display of posters in public places such as in government offices, project offices, community centers, etc.

Distribution of brochures

Local/village-level government officers/ representatives to hold small-group discussions

NGOs and community-based organizations; and

Village heads, religious heads, Imams etc.

Print and electronic media, including radio.

Budget and Human Resources

The following table depicts staff and other human resource requirement at various levels:

Location	Staff	Number	Note
Tier 2 - Central PMU GRC	GRC - Convener	1	
	Member 1	1	
	Member 2	1	
	Member 3	1	
	Attached Officer (Operation)	1	
	Gender Specialist	1	
	E&SSS - Member Secretary	1	
Tier 1 – Local	1. Institution Head -1(Convener)	550	For (IDG, EBT, Short Course, RPL) Components
	2. Focal Point-1(Member Secretary)	550	
	3. Teacher/Representative from Implementing Institutions/Industry Partner-1(Member)	550	
	4. Local Ward Councilor -1(Member)	550	
	5. Representative from Local women's Group -1(Member)	550	
	6. Representative from PAP Group-1(Member)	550	
	7. Women representative from UP/WC (In case PAP is female)-1 (Member)	550	
TOTAL		3850	

Note: Females will make at least 30% of any Committee members. List of all GRC members at all Tiers will be kept with PMU.

The following is a summary of GRC Budget required for GRM implementation per year:

Sl.	Activities	Quantity	Unit Cost (BDT)	Frequency	Total Cost (BDT)/Yr
1	Meeting on GRC/ GRC Committee (for all level)	4 meeting/yr*50	1000	Yearly	200,000
2	Stationery, Printing, Computer, Phone/SMS Charge etc.	Lump Sum		Yearly	50,000
3	Travel Expenses/ Investigation etc.	Lump sum		Yearly	100,000
4	Communication Materials (Poster, Brochure)	Lump Sum		One time	400,000
5	GRM Guidebook/ Manual	Lump Sum		One Time	100,000
6	GRM Box	100	2000	One time	200,000
7	Honorarium for committees	Lump sum		Yearly	200,000
8	Contingency (10%)				125,000
Total BDT:					137,5000

Annex A

COMPLAINT FORM (Needs to be translated in Bangla)

Tracking Number:

Complainant Information (Person Reporting)

1. Name (Not required if anonymity sought):
2. Address:
3. National ID (Not required if anonymity sought):
4. Gender:
5. Telephone (Not required if anonymity sought):
6. Email (Not required if anonymity sought):
7. Type of complainant:
 - ☐ Affected Person/s (AP)
 - ☐ Intermediary (on behalf of the AP)
 - ☐ Civil Society Organization/ NGOs
 - ☐ Service Organization (e.g., local government institution)
 - ☐ Others (specify)

Complaint Details

8. Mode of Receiving Complaint:
 - ☐ Letter
 - ☐ Phone call
 - ☐ SMS
 - ☐ Email
 - ☐ Verbal complaint (walk-in)
 - ☐ Suggestion box
 - ☐ Others (specify)
9. Location of the problem specified in the complaint:

Village/Union/Upazilla:

District and Division:
10. Type of Complaint
 - ☐ Environmental (Noise, Pollution, Waste etc.)
 - ☐ Land Acquisition and Compensation

- ☐ Social (GBV, Security Forces, Community Health, Traffic, Labor Issues, Harassment)
- ☐ Construction/ Contractors
- ☐ Indigenous People/ Minority issues
- ☐ Others (specify)

11. Short Description of the Complaint

12. Short description of the factors causing the problem

13. Person/agency likely responsible for causing the problem:

- ☐ Project implementing agency
- ☐ Other Affected Parties
- ☐ Service providing agencies
- ☐ Local political authority
- ☐ Civil organization/NGO
- ☐ Funding agencies
- ☐ Contractor
- ☐ Labors
- ☐ Others (specify)
- ☐ Unknown.

14. Details of the staff/ focal point that received the complaint:

Name:

Position:

Office:

Date and Time:

Location where complaint received:

15. Action taken by receiving office/staff, including date and time:

16. Subsequent Action Taken:

Date and Time	Action	By Whom

17. Final Resolution (From the GRC Committee Meeting)

18. Signature/Acknowledgement:

Date and Time	Individual Appointment	Name	Mode of Communication	Remarks, if any	Signature
	Head of decision-making entity				
	Responsible Staff				
	Complainant				

Annex B

GRC REVIEW MEETING MINUTES AND DECISION FORM

Date and Time of Meeting:

Tracking Number:

Venue of Meeting:

List of participants:

Complainant Side	GRC Members	Any Other Party	

Summary of Grievance:

Key discussions:

Decisions Made/Recommendations by the Grievance Redress Committee:

Status of Grievance (tick where applicable):

Solved		Unsolved	
Referred to		Others	

Signature with Date

Meeting Chairperson:

Complainant:

Others:

Annex C

M&E/ QUARTERLY COMPILATION REPORT FORM

Date of Submission:

Compiled by:

Period Covering:

Ser	Tracking Number	Date of Complaint Receipt	Place of receiving complaint	Location of complaint/concern	Name & Address of complainant	Type of Complaint (Environment, Construction, Land, GBV, etc.)	Date of 1 st Meeting	Date of 2 nd Meeting	Progress (ongoing, solved, referred etc.)

Annex D

GRM RESOLUTION SATISFACTION FORM (Needs Bangla Translation)

Complainant Name.

NID.

Phone.

Address.

Date of Complaint Lodge.

Tracking Number.

I had put up a complain at the XXXX Project GRC Office located at (location) My complain was (summary description of complaint)

...

...

...

...

On (date of resolution receipt) my complain was given a resolution by GRC. As per the resolution (description of resolution)

.....

.....

.....

.....

I am satisfied with the given resolution.

Signature and date of the Complainant

Signature and date of the GRC Head

Annex E

SEA/SH Consent Form CONFIDENTIAL

Should be read to the survivor or guardian and explained that she / he can choose any or none of the options listed.

I, _____, give my permission for (**Name of Organization**) to share information about the incident I have reported to them as explained below:

I understand that in giving my authorization below, I am giving (**Name of Organization**) permission to share the specific case information from my incident report with the service provider(s), PMU and the World Bank. I have indicated, so that I can receive help with safety, health, psychosocial, and/or legal needs.

I understand that shared information will be treated with confidentiality and respect and shared only as needed to provide the assistance I request. I understand that releasing this information means that a person from the agency or service ticked below may come to talk to me. At any point, I have the right to change my mind about sharing information with the designated agency / focal point listed below.

I would like information released to the following:

(Tick all that apply, and specify name, facility and agency/organization as applicable)

Yes No

- | | | |
|--------------------------|--------------------------|--|
| ☐ | ☐ | Security Services (specify): |
| ☐ | ☐ | Psychosocial Services (specify): |
| ☐ | ☐ | Health/Medical Services (specify): |
| ☐ | ☐ | Safe House / Shelter (specify): |
| ☐ | ☐ | Legal Assistance Services (specify): |
| ☐ | ☐ | Livelihoods Services (specify): |
| ☐ | ☐ | Other (specify type of service, name, and agency): |

I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

Survivor's/ Guardians Signature/ Thumb Print

Date:

Case Code:

Coded Data (The data below must be coded to hide Survivor's identity)

Survivor's Name:

Guardian's Name:

Contact Number:

Address:

Annex F

POTENTIAL GRIEVANCES FOR THE PROJECT

Scope	Potential Issues	Suggested Action	Remark/Note
Land Acquisition	Timely notice or information about acquisition given		
	Land and asset valuation not done properly		
	Land acquired forcibly		
	Compensation not paid		
	Compensation paid less than valuation		
	Delay in compensation payment		
	Land and asset rendered unusable due to project activities		
	Squatters evicted without compensation		
Construction	Construction material kept in road/ own plot without permission		
	Sound pollution due to construction		
	Water pollution due to construction activities/ labor camp		
	Air pollution due to construction activities		
	Private land occupied by Contractor		
	Traffic problem due to construction vehicle		
Labor	Harassment by Contractor personnel		
	Public nuisance by labors		
	Issue with security personnel employed by Contractors		
	Gender-based Violence by labors		
	Any other social issues by Contractor personnel		
Indigenous People	No consultation done with IP. No/limited information shared		
	Consultation not done as per culturally appropriate form		

	Impact on IP Land		
	Impact on IP cultural heritage, belief, social hierarchy		
Biodiversity/ Habitat	Impact on biodiversity		
	Impact on habitat		
	Effect on forest, crops and trees		
Environmental Impact	Use of pesticides		
	Waste generation (medical and hazardous wastes)		
	GHG emission		
	Resources wastage (Energy, water, raw material)		
Social Impact	Not consulting disadvantaged and vulnerable		
	No special arrangement for consulting women and children		
	Lack of GRM/ GRM process ineffective		
	Not closing the feedback loop for consultation		
Implementation	Project officials demand money for service/ project benefit		
	Project officials' rude behavior		
	Elite capture of project benefits		
	Corruption or illegal activities by project personnel		
	Project activities not being implemented as planned/ low quality of service/ product/ activities		

Annex G

GRIEVANCE REDRESS MECHANISM CHECKLIST

(Check before deployment of GRM)

A. System issues

- | | | | |
|----|--|----------|---------|
| 1. | Does the project invite feedback/grievances? | Yes_____ | No_____ |
| 2. | Does the organization have a policy on grievance redress? | Yes_____ | No_____ |
| | a. Is the policy available to all staff, beneficiaries, and potential users? | Yes_____ | No_____ |
| | b. Is the policy written in the local language(s)? | Yes_____ | No_____ |
| 3. | Does the grievance mechanism have the following features? | | |
| | a. A clearly understood procedure for people to provide feedback and/or submit grievances. | Yes_____ | No_____ |
| | b. A statement of who is responsible for dealing with feedback/grievances. | Yes_____ | No_____ |
| | c. Procedures for resolving or mediating and investigating grievances depending on their seriousness and complexity. | Yes_____ | No_____ |
| | d. A system for keeping complainants informed of status updates. | Yes_____ | No_____ |
| | e. A system for recording feedback/grievances and outcomes. | Yes_____ | No_____ |
| | f. Procedures for protecting confidentiality of complainants | Yes_____ | No_____ |

B. Staff management

- | | | | |
|----|---|----------|---------|
| 1. | Is there a grievance manual for staff? | Yes_____ | No_____ |
| 2. | Do the grievance policy and/or procedures provide guidance on: | | |
| | a. What is grievance/feedback? | Yes_____ | No_____ |
| | b. What information to collect from complainants? | Yes_____ | No_____ |
| | c. What remedies can or should be used to resolve grievances? | Yes_____ | No_____ |
| 3. | Are the grievance policy and procedures communicated to all staff? | Yes_____ | No_____ |
| 4. | Are adequate resources allocated for the grievance mechanism to function effectively? | Yes_____ | No_____ |
| 5. | Does the organization provide training on grievance management to staff? | Yes_____ | No_____ |

C. Communication to grievance mechanism users

- | | | | |
|----|---|----------|---------|
| 1. | Are users told how to submit grievances/feedback? | Yes_____ | No_____ |
| | a. Is an information brochure on the grievance mechanism available to users? | Yes_____ | No_____ |
| | b. Are feedback/grievance forms available to users? | Yes_____ | No_____ |
| | c. Are grievance forms or signs displayed prominently and readily accessible? | Yes_____ | No_____ |
| | d. Are contact details of staff receiving feedback/grievance published and displayed in public areas? | Yes_____ | No_____ |
| | e. Is information on grievance management available in local languages? | Yes_____ | No_____ |
| 2. | Are users able to submit grievances/feedback: | | |
| | a. In writing | Yes_____ | No_____ |

- | | | |
|---|----------|---------|
| b. By email | Yes_____ | No_____ |
| c. By SMS | Yes_____ | No_____ |
| d. By telephone | Yes_____ | No_____ |
| e. In person | Yes_____ | No_____ |
| 3. Are users provided with assistance to submit feedback/grievances where needed? | Yes_____ | No_____ |
| 4. Can the grievance mechanism be accessed free of charge? | Yes_____ | No_____ |
| 5. Are users promised confidentiality? | Yes_____ | No_____ |
| 6. Are users informed about the appeals process? | Yes_____ | No_____ |

D. Feedback/grievance recording

- | | | |
|--|----------|---------|
| 1. Are all feedback/grievances recorded? | Yes_____ | No_____ |
| a. Are grievances/feedback logged and documented? | Yes_____ | No_____ |
| b. Are inquiries/suggestions and recommendations recorded? | Yes_____ | No_____ |
| c. Are the outcomes and responses to all grievances/feedback recorded? | Yes_____ | No_____ |

E. Business standards

- | | | |
|--|----------|---------|
| 1. Are there business standards in place for the process and timing with which grievances/feedback are dealt with? | Yes_____ | No_____ |
| a. Is receipt acknowledged within a stipulated time frame? | Yes_____ | No_____ |
| b. Are the grievances supposed to be resolved within a stipulated time frame? | Yes_____ | No_____ |
| 2. Is there a quality control system in place to: | | |
| a. Check if all grievances have been dealt with or acted upon. | Yes_____ | No_____ |
| b. Check if all aspects of a grievance have been addressed. | Yes_____ | No_____ |
| c. Check if all necessary follow-up action has been taken. | Yes_____ | No_____ |

F. Analysis and feedback

- | | | |
|--|----------|---------|
| 1. Are regular internal reports on grievances/feedback produced for senior management? | Yes_____ | No_____ |
| 2. Grievances/feedback reports include data on: | | |
| Numbers of grievances/feedback received. | Yes_____ | No_____ |
| Compliance with business standards. | Yes_____ | No_____ |
| Issues raised in grievances/feedback. | Yes_____ | No_____ |
| Trends in grievances/feedback over time. | Yes_____ | No_____ |
| The causes of grievances/feedback. | Yes_____ | No_____ |
| Whether remedial action was warranted. | Yes_____ | No_____ |
| What redress was actually provided? | Yes_____ | No_____ |
| Recommendations/strategies to prevent or limit future recurrences. | Yes_____ | No_____ |
| 3. Are reports about grievances/feedback made public, periodically? | Yes_____ | No_____ |

Annex H

SEA/SH SERVICE PROVIDER LIST FOR THE PROJECT

(Update this list before GRM Deployment. Coordinate with the service providers before listing them here)

SER	NAME OF ORGANISATION	SERVICE						CONTACT PERSON AND DESIGNATION	EMAIL, PHONE, ADDRESS	NOTE
		Health	Psychosocial	Legal	Shelter	Training/Job	Others			