

Operational Guidelines: Grievance Redress Mechanisms (GRM)

Moldova Education Reform Project (P127388)

Additional Financing (P156657)

1. Introduction

Transparency and accountability are core elements of the Moldova Education Reform Project (MERP). For this purpose, the project will include a Grievance Redress Mechanism (GRM). The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. The GRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

2. Definition of GRM

For the purposes of these Operational Guidelines, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

The terms ‘grievance’ and ‘complaint’ are used interchangeably.

3. GRM scope and use

SCOPE: MERP’s Grievance Redress Mechanism will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

GRM’s users: Project beneficiaries, project affected people (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the GRM for the above purposes (see Scope).

GRM’s management: The GRM for Moldova Education Reform Project is managed by the MERP’s Project Coordination Unit, under the direct responsibility of MERP’s Executive Director. Additionally, in the case of school rehabilitations under Moldova Social Investment Fund’s (MSIF) responsibility, stakeholders can also reach out to them in case of concerns/complaints.

Submission of complaints: Complaints can be expressed at any time throughout project implementation.

4. Procedures

4.1 Channels to make complaints

MERP establishes the following channels through which citizens/beneficiaries/Project Affected Persons (PAPs) can make complaints regarding project-funded activities:

- a. By Email
 - MECR/MERP: merp@edu.md, merp.edu@gmail.com
 - MSIF's email address: [office@msif.md]
- b. Internet:
 - MECR's website: MERP's section, GRM rubric
 - MSIF's website: [http://www.fism.gov.md/ro/content/contacte]
- c. In writing:
 - MECR/MERP: Letter addressed MERP's Executive Director at 180 Stefan cel Mare boulevard, 13th floor, office 1305, 1307, Chisinau city
 - MSIF: [124 Stefan cel Mare si Sfint boulevard, 3rd floor, office 12, Chisinau city, MD-2001, Republic of Moldova]
- d. By phone:
 - MECR/MERP: [022-23-25-02]
 - MSIF: [022-27-91-21]
- e. By fax:
 - MECR/MERP: 022-23-25-02
 - MSIF: [022-27-53-20]
- f. Other: Written complaints or phone calls to project staff at MECR/MERP or MSIF staff.

The project shall ensure flexibility in the channels available for complaints, as well as ensure accessibility to the contact information for individuals who make complaints. MERP's Executive Director must be informed of all complaints received.

4.2 Confidentiality and conflict of interest

Complaints may be made anonymously and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to submit complaints have been established and conflicts of interest will be avoided.

4.3 Receipt and recording of complaints

The person receiving the complaint will complete a grievance form (see Annex A) and will record the complaint in the Register of Complaints, kept under each MERP and MSIF. Then, the complaint is to be submitted immediately to the corresponding Executive Director (MERP's Executive Director, if the complaint was received by MECR, and MSIF's Executive Director if the complaint was received by MSIF) for sorting and redirecting to the appropriate department of their institution.

Within one week of receiving the complaint, MERP's Executive Director must have forwarded to the department/individual expected to address it. In consultation with the Project Coordinator, MERP's Executive Director is responsible for determining who to direct the complaint to, whether a complaint requires an investigation (or not), and the timeframe to respond to it. In the case of MSIF, its Executive Director will determine who to direct the complaint to.

When determining who will be the investigating officer, the Executive Directors should ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GRM records enters this data into the Register of Complaints, and informs the complainant that his/her grievance was received and the timeframe expected for the response.

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications. Once a month, the Project Coordinator and MSIF's Executive Director should submit to MERP's Executive Director a list of all complaints received, the follow-up required, and the status of complaints from the previous month ("on-going" or "addressed").

4.4 Investigation

According to the National Law on complaints no. 190 dated July 19, 1994, with further amendments, the complaints shall be examined within 30 working days of the receipt of the grievance. The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. The investigation/follow-up can include site visits, review of documents and a meeting with those who could resolve the issue.

The results of investigation and the proposed response to the complainant will be presented for consideration to MERP's Project Coordinator or MSIF's Executive Director, who will decide on the course of action. Once a decision has been made and on the complainant informed, the investigating specialist describes the actions to be taken in the grievance form (see Annex A), along with the details of the investigation and the findings, and submits the response to the corresponding Executive Director for signing.

4.5 Responding to Complaints

The complainant will be informed about the results of verification via letter, email or by post, as received. The response shall be based on the materials of the investigation and, if appropriate, shall contain references to the national legislation.

The deadline for investigating the complaint may be extended by 30 working days by the corresponding Executive Director, and the complainant is to be informed about this fact, whether:

- a) additional consultations are needed to provide response to the complaint;
- b) the complaint refers to a complex volume of information and it is necessary to study additional materials for the response.

5. Awareness building

5.1 Information provided in an accessible format

Information about the Grievance Redress Mechanism will be available at the Ministry of Education, Culture and Research's website (MERP's section) and Moldova Social Investment Fund's website, and will be included in communications with stakeholders and in events organized under the project. The Ministry of Education, Culture and Research will also inform via email all the Local Education Departments, and beneficiary schools of all project activities, with instructions that the information be publicly displayed. The information about the GRM will also be included as part of the communication campaign about the project.

MERP will include information provided on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

6. Staffing and capacity building

6.1 Tasks and responsibilities of MSIF and MERP's teams on the GRM

Responsibilities for the GRM will be documented in the Project Operations Manual, and kept updated. They include:

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints
- Thorough examination of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns (see above 4.2)
- Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GRM results

7. Transparency, monitoring and reporting

7.1 Transparency

Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available on the Ministry of Education, Culture and Research's web page and MSIF's web page, MERP's section. They will be updated quarterly.

7.2 Regular internal monitoring and reporting

The corresponding Executive Director will assess quarterly the functioning of the GRM in order to:

- Provide a monthly/quarterly snapshot of GRM results, including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.
- In the case of MSIF, as part of its regular implementation reports to MECR/MERP, it will inform the Project Coordinator about the complaints received and their status.

During quarterly MERP's meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

7.3 Reporting in half-yearly and annual progress reports submitted to the World Bank

In the semi-annual project implementation reports submitted to the Bank, MERP shall include a GRM section, which provides updated information on the following:

- Status of establishment of the GRM (procedures, staffing, awareness building, etc.);
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved;
- Qualitative data on the type of complaints and answers provided, issues that are unresolved;
- Time taken to resolve complaints;
- Number of grievances resolved at the lowest level, raised to higher levels;
- Any particular issues faced with the procedures/staffing or use;
- Factors that may be affecting the use of the GRM/beneficiary feedback system;
- Any corrective measures adopted.

ANNEX A – GRIEVANCE/INQUIRY RECORD

GRIEVANCE/INQUIRY RECORD (Form A)				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:		Name of Staff Completing Form:		
Grievance Received (check √): <input type="checkbox"/> National <input type="checkbox"/> Oblast <input type="checkbox"/> Rayon <input type="checkbox"/> Village				
Mode of Filing Inquiry or Grievance (check √): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Rayon:	Village:	
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				
	Category 1	Social Safeguards		
	Category 2	Environmental Safeguards		
	Category 3	Grievances regarding violations of policies, guidelines and procedures		
	Category 4	Grievances regarding contract violations		
	Category 5	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns		
	Category 6	Grievances regarding abuse of power/intervention by project or government officials		
	Category 7	Grievances regarding MERP staff performance		
	Category 8	Reports of force majeure		
	Category 9	Grievance about project interventions		
	Category 10	Other		
Who should handle and follow up on the grievance:				
Progress in resolving the grievance (e.g answered, being resolved, settled):				