



MALDIVES: Atoll Education Development Project
(P177768)

Grievance Redressal Mechanism

Ministry of Education

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1. Introduction

Transparency and accountability are key tenets of the MALDIVES: Atoll Education Development Project (AEDP). In line with this, the Grievance Redressal Mechanism (GRM) works towards strengthening accountability and providing avenues for project beneficiaries and all stakeholders to provide constructive feedback on project activities. The GRM provides a mechanism that allows for the identification and resolution of issues affecting the project. Thus, it acts to reduce the risk of the project inadvertently affecting beneficiaries and serves as an important feedback and learning mechanism that can help increase the positive impacts of the project. The GRM is further supported by information sessions and training.

The GRM aims to ensure that any grievances and complaints related to the project are promptly reviewed and addressed by responsible personnel/units. The GRM will facilitate prompt responses to grievances by providing support to address the issues raised in a quick and effective manner.

2. Definition of GRM

For the purposes of this operations manual, a grievance redress mechanism (GRM) is defined as a process for receiving, evaluating, and addressing project-related complaints and feedback from affected communities at the level of the project.

3. Scope

a. Who can submit a grievance?

A grievance can be submitted by individuals and communities, who believe they are directly and adversely affected by the Project. This includes project beneficiaries, project stakeholders, as well as the wider citizenry. Individuals or communities may utilize the GRM to submit complaints as well as to provide suggestions and feedback.

Grievances can be submitted anonymously.

b. Who manages the GRM?

The GRM is owned and managed by the Operations and Monitoring Support Unit (OMSU), based in the Ministry of Education (MoE). The grievance log will be maintained by the dedicated focal point of the OMSU. All grievances are to be managed, addressed and reported as expressed in this document.

c. What can be redressed under this mechanism?

Grievances should meet the below stated criteria for it to be eligible for redressal under the Project GRM.

1. The complaint relates to a project component or activity that is under preparation, active, or has been closed for less than 12 months.
2. The complaint is submitted by individuals or communities affected by the project component or activity, or by their authorized representative.

3. The grievant(s) allege that they have been or will be affected by the project.
4. Grievances related to the design or suitability of AEDP activities and policies.

There is no charge for making a complaint or conveying comments and/or suggestions.

The following will not be handled under the Project Grievance Redress Mechanism.

1. Grievances not related to AEDP.
2. Grievances related to government policies and procedures.

For grievances that do not meet the eligibility criteria, the grievant must be informed of the decision along with the reason, within 3 (three) working days of submitting the grievance.

4. Process

a. How to submit a grievance?

Grievances can be submitted via the following channels.

- i. Via email: feedback.aedp@moe.gov.mv
- ii. Via AEDP project website
- iii. Via mail/letter addressed to:

Maldives Atoll Education Development Project,
Ministry of Education,
8th floor, H. Velaanaage, 20096,
Ameer Ahmed Magu, Male' City,
Republic of Maldives

- iv. Via feedback boxes at subproject sites.
- v. Via direct messages through social media platforms
 - a. Facebook
 - b. Twitter
 - c. Instagram

Grievances can be submitted anonymously, and all content will be kept confidential.

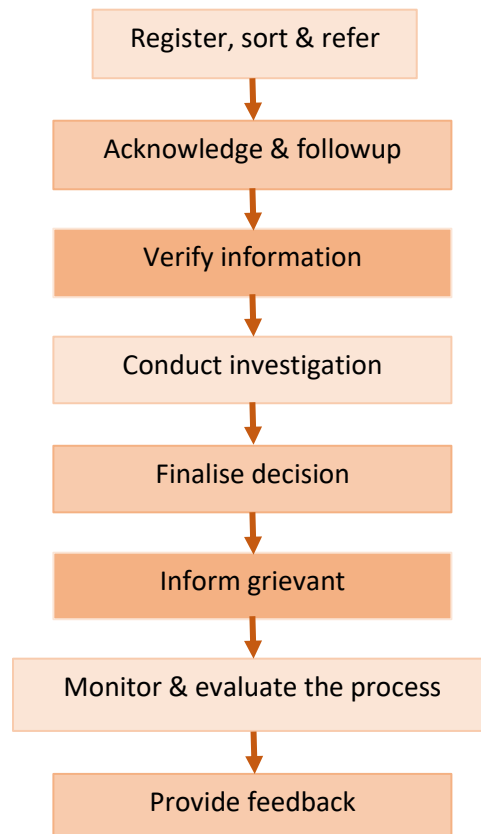
b. What should be included in a grievance?

The following information should be conveyed by the grievant.

- i. Subject matter: The grievance must allege actual or potential harm/benefit resulting from AEDP components or activities. (Mandatory)
- ii. Substance: The grievance must state the impact(s) allegedly caused or likely to be caused by the Project. This should be supported by available documentation and correspondence, where possible and appropriate. (Mandatory)

- iii. Grievant: Identify the individual(s) submitting the grievance and specify whether it is being submitted by a representative. If so, include the name, signature, contact details, and written proof of authority of the representative. (Optional)
- iv. Suggestions on how the grievant believes the issue should be resolved. (Optional)

c. Stages of the GRM



- Register and sort

Upon receipt of a grievance, the Social Safeguard Specialist of the OMSU should be notified within 2 (two) working days. They will then be responsible to assess whether the grievance can be redressed under the mechanism established by the Project. If it meets the criteria, the Social Safeguard Specialist must register and log the grievance in the 'Grievance Registry' and identify and refer to the tier it can be redressed at, based on its nature and severity. The grievance registry should clearly include the duration taken at every stage of the process and identify the category and classification.

Category	Classification
1	Grievances regarding violations of regulations
	1.1 Violation of project policies and guidelines
	1.2 Violation of World Bank regulations
	1.3 Violation of national laws and regulations
	1.4 Contract violations
2	Grievances regarding project finance
	2.1 Misuse of project funds
	2.2 Lack of transparency
	2.3 Fraudulence in dispersal
	2.4 Other financial management concerns
3	Grievances regarding procurement
	3.1 Procurement of consultants
	3.2 Procurement of non-consultancies
	3.3 Procurement of goods
	3.4 Procurement of works
4	Grievances regarding abuse of power
	4.1 Abuse of power by project officials
	4.2 Abuse of power by government officials
	4.3 Abuse of power by a third party
5	Environmental grievances
	5.1 Construction level impacts at rehabilitation/construction sites
	5.2 Inadequacy of sanitation facilities and water supply
	5.3 Waste generation
	5.4 Transport and labor camps
	5.5 Air quality
	5.6 Resource extraction
6	Social grievances
	6.1 Worker safety
	6.2 Community safety
	6.3 Noise
	6.4 Sexual Harassment/Abuse/Exploitation
	6.5 Gender disparity
7	Feedback
	7.1 Suggestions
	7.2 Appreciations
	7.3 Requests

When determining who will be investigating the grievance, the Social Safeguard Specialist must 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.

- Acknowledge and followup

The focal point at each tier will be responsible to communicate the timeframe and course of action to the grievant in writing within 5 (five) working days of receipt of the grievance. Any additional documentation should also be ideally sought at this stage.

- Investigation

The focal point at each tier is responsible for investigating the grievance and gathering facts to generate a clear picture of the circumstances. Modes of verification normally includes site visits, review of documents, a meeting with the complainant (if known and willing to engage), and a meeting with those who can resolve the issue (including members from the implementing agencies, schools and Ministries).

For grievances of complex nature, it may be referred to the Grievance Redressal Committee at Tier 2. Based on the complexity of the grievance, and in consultation with Project Director, the GRM focal point will review and determine the (i) eligibility of the grievance/complaint for referral to a Grievance Redressal Committee; and (ii) the timeframe within which the complaint should be resolved. The MoE will establish a Grievance Redress Committee (GRC) for the AEDP comprising representatives from the (i) project steering committee; (ii) implementing partner agencies; (iii) local councils; (iv) OMSU; and (v) NGOs/Civil Society organizations. Additionally, a legal officer will be appointed to the GRC. Adequate female representation and participation in the composition of the GRC will be ensured. Such referrals should be completed within a maximum of 4 (four) working days of receiving the complaint

Once the decision has been made on the course of action and on the response to be provided to the grievant, the focal point should inform the Social Safeguard Specialist of the OMSU, who will then present the results of the verification, investigation and proposed response to the Project Director for consideration. Once finalized, the focal point should communicate to the grievant, the proposed action(s) and how to appeal the decision in writing, within the allocated timeframe.

The Social Safeguard Specialist of the OMSU will enter the findings into the grievance register. The Monitoring and Evaluation Specialist, with guidance from Project Director will monitor and evaluate the grievance redressal process and provide feedback.

- Reporting

Progress reports shared with the Bank shall include a GRM section which provides updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting, etc.)
- Quantitative data on the number of grievances received, the number of grievances relevant, and the number of grievances resolved
- Qualitative data on the type of grievances and answers provided, and issues that are unresolved
- Time taken to resolve the grievances
- Channels through which the grievances were received

- The number of grievances resolved at the lowest level, raised to higher levels
- Satisfaction of the grievant with the action taken
- Any procedure related issues
- Factors that may affect the use of the GRM/beneficiary feedback system
- Any corrective measures adopted

- Possibility to appeal

If the grievant is not satisfied with the outcome of the redressal process, they have the opportunity to appeal in writing within 5 (five) working days of receiving the decision. Upon receiving an appeal, discussions will be held in groups or individually to further clarify the positions at stake. Senior management will take part in these meetings and a final decision on the action(s) will be made. The OMSU may form a separate appeals hearing committee, on an ad hoc basis. This committee shall comprise of the technical committee members and the OMSU. Focal points of implementing agencies may be invited based on relevancy. The terms of this committee will be agreed prior to its formation.

5. Tiers of the GRM

The project practices a 4-tier grievance redressal mechanism.

a. Tier 1: Island level

Focal point:	Designated focal points of schools
Timeframe:	15 calendar days
Procedure:	<p>An aggrieved party may submit a grievance via any of the channels identified in 4(c) of this document. If the grievance is received at the island level, the Social Safeguard Specialist of the OMSU must be notified within 2 (two) working days of receipt.</p> <p>Upon receipt of the grievance, the Social Safeguard Specialist will review and sort the complaint. He/She will determine if the grievance meets the eligibility criteria and the tier it can be redressed at based on the complexity, nature and severity of the grievance. If the grievance meets the eligibility criteria, it will be entered into the database and referred to the school focal point to begin the redressal process. The database will be confidential, with access limited to relevant OMSU staff and WB counterparts. <i>For grievances that do not meet the eligibility criteria, the complainant will be informed with reason for not meeting the criteria.</i></p> <p>All grievances must be logged and acknowledged within 5 (five) working days of receipt. Any additional document may also be sought from the grievant. Simultaneously, the school focal point must commence the investigation and share the resolution with the OMSU and the grievant within 15 (fifteen) working days. The grievant can submit their agreement or disagreement of the resolution within 5 (five) working days. If no response is received from the grievant during this</p>

	<p>period, the grievance will be marked as resolved.</p> <p>If the grievant is in disagreement with the resolution, they have the opportunity to re-submit at any of the other tiers.</p>
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b. Tier 2: OMSU level

Focal point:	Social Safeguard Specialist (AEDP)
Timeframe:	15 calendar days
Procedure:	<p>An aggrieved party may submit a grievance via any of the channels identified in 4(c) of this document. If the grievance is received at the island level, the Social Safeguard Specialist of the OMSU must be notified within 2 (two) working days of receipt.</p> <p>Upon receipt of the grievance, the Social Safeguard Specialist will review and sort the complaint. He/She will determine if the grievance meets the eligibility criteria and the tier it can be redressed at. If the grievance meets the eligibility criteria, it will be entered into the database and the grievance redressal process will begin. The database will be confidential, with access limited to relevant OMSU staff and WB counterparts. <i>For grievances that do not meet the eligibility criteria, the complainant will be informed with reason for not meeting the criteria within 3 (three) working days of receiving the grievance.</i></p> <p>All grievances must be logged and acknowledged within 5 (five) working days of receipt. Any additional document may also be sought from the grievant. Simultaneously, the Social Safeguard Specialist of the OMSU must commence the investigation and share the resolution with the grievant within 15 (fifteen) working days. Based on the complexity of the grievance, in consultation with Project Director (PD), the GRM focal point will review and determine the (i) eligibility of the grievance/complaint for referral to a Grievance Redressal Committee; and (ii) the timeframe within which the complaint should be resolved.</p> <p>The grievant can submit their agreement or disagreement of the resolution within 5 (five) working days of conveying the decision. If no response is received from the grievant during this period, the grievance will be marked as resolved.</p> <p>If the grievant is in disagreement with the resolution, they have the opportunity to re-submit at any of the other tiers.</p>

c. Tier 3: Grievance Redress Service (GRS)

Focal point:	World Bank
Procedure:	All aggrieved parties have the opportunity to submit a grievance related to the Project through World Bank's GRS. For information on how to submit a complaint to the World Bank's corporate GRS, the grievant may visit http://www.worldbank.org/GRS

d. Tier 4: Judiciary

Focal point:	Judicial system
Procedure:	The legal system is accessible to all aggrieved persons. It is an option available for an aggrieved person and/or community in cases where the other levels of the grievance redressal mechanism have not been effective.

6. Budgeting

An earmarked budget for the GRM will be included in the budgets approved by the Bank. The budget will include the costs for the following GRM related activities:

- Grievance Handling:
 - Establishment and management of the channels for submitting grievances
 - Management of grievance collection
 - Recording and categorization
 - Investigation
 - Communication with the grievant
 - The appeals process
- Supporting costs:
 - Capacity-building of the Staff assigned to the GRM
 - Independent review (if and as needed)