Caribbean Regional Communications Infrastructure Program (CARCIP)

Grievance Redress Mechanism

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# Table of Contents

1.0 INTRODUCTION .................................................................................................................. 3

2.0 THE GRIEVANCE REDRESSAL MECHANISM........................................................................ 3

   2.1 OBJECTIVES.......................................................................................................................... 3
   2.2 PROJECT STAKEHOLDERS ................................................................................................. 4
   2.3 RESPONSIBILITY FOR GRIEVANCE REDRESSAL .............................................................. 4
   2.4 GRIEVANCE REDRESSAL MECHANISM STRUCTURE ......................................................... 4
       2.4.1 First Tier of Redressal .................................................................................................. 5
       2.4.2 Second Tier of Redressal .............................................................................................. 6
       2.4.3 World Bank Grievance Redress Service (GRS) ............................................................... 7
   2.5 GENERAL INFORMATION .................................................................................................... 8
       2.5.1 Building Awareness on the GRM Structure ..................................................................... 8
       2.5.2 Reporting ......................................................................................................................... 8
       2.5.3 Periodic review by the Grievance Redressal Committee ................................................... 8
       2.5.4 GRM Jurisdiction ............................................................................................................ 8

APPENDIX 1 – COMMUNITY POINT OF CONTACT/LEADERS .................................................. 9

APPENDIX 2 - RECEIPT OF COMPLAINT ................................................................................. 10

APPENDIX 3 - GRIEVANCE INFORMATION FORM (GIF) (FOR ADDITIONAL DETAILS) ........... 11

APPENDIX 4 - MEETING RECORD FORMAT – (GRIEVANCE REDRESS COMMITTEE (GRC) AND OTHER MEETINGS) ......................................................................................... 12

APPENDIX 5 - DISCLOSURE FORM ........................................................................................... 14
1.0 Introduction

The Government of Grenada through the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation with funding from the World Bank is implementing the Caribbean Regional Communications Infrastructure Program (CARCIP). The project aims to increase access to regional broadband networks and advance the development of an ICT\(^1\)-enabled services industry in the Caribbean Region, in support of implementation of CARICOM’s comprehensive ICT strategy. Installation of a modern submarine telecommunications cable between St. Vincent and the Grenadines and Grenada represents a major component of this project. These cables will be subsequently connected to terrestrial cables and stations located at Conference, St. Andrew’s and Lauriston, Carriacou in Grenada.\(^2\)

Whilst the project has been classified as a Category B project in conformance with the World Bank Operational Manual OP 4.01, it has been predicted through an Environmental and Social Impact Assessment process to result in some unintended consequences to communities and the environment. These impacts if not effectively avoided and/or mitigated can result in preventable challenges and further exacerbate existing social and environmental vulnerabilities. In order to ensure the smooth implementation of the Project and the timely and effective resolution of challenges encountered during implementation, a Grievance Redressal Mechanism (GRM) is developed. This mechanism will enable Project Authorities to address grievances reported by project stakeholders, including beneficiaries at the community level.

This document presents the GRM for the Lot 3 component of CARCIP.

2.0 The Grievance Redressal Mechanism

2.1 Objectives

The GRM seeks to achieve the following objectives:

- Provide a communication medium to answer queries and receive complaints and grievances from stakeholders related to implementation of the project.
- Resolve environmental and social grievances associated with project implementation in a quick and amicable manner, thus limiting adverse impacts on the affected person or group.
- Ensure that all applicable Government of Grenada and World Bank Environmental and Social Standards are adhered to in all subprojects and activities.
- Establish relationships of trust between project team members and affected local communities/residents.

\(^1\) Information and communications technology (ICT).
\(^2\) Herein after referred to as the Lot 3 component of the project.
2.2 Project Stakeholders

The following are the main stakeholders of the Project:

✓ Other relevant ministries and agencies of the Government of Grenada.
✓ Local communities and residents within the Study Area of the implemented project.
✓ Local community based organizations/Non-Governmental Organizations (CBOs/NGOs).
✓ World bank.
✓ Digicel.

2.3 Responsibility for Grievance Redressal

The Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation\(^3\) and the CARCIP Project Office\(^4\) in collaboration with Digicel Grenada are the lead entities responsible for operationalization of the GRM compliant to the laws of Grenada and the Environmental and Social Standards of the World Bank. **Permanent Secretary, with responsibility for Public Utilities & Energy within the aforementioned Ministry** has overall responsibility for the effective implementation of the redressal mechanism.

CARCIP’s Project Manager and Environmental and Social Safeguard Specialist are the main officers assigned for on the ground implementation of the GRM. Their main responsibilities are as follows:

- Function as the Focal Point for the GRM among community stakeholders and create a communication link between affected stakeholders and the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation.
- Create awareness of the GRM amongst stakeholders through public awareness activities.
- Assist in redressal of all grievances by liaising with relevant concerned parties.
- Maintain a database of all grievances and redressals.
- Monitor project activities of contractors to assess evidence of redressal of grievances.
- Prepare related quarterly reports.

2.4 Grievance Redressal Mechanism Structure

A two (2) tier redressal structure is planned to address all complaints in the Project.

\(^3\) Implementing Agency.
\(^4\) Project Executing Agency.
2.4.1 **First Tier of Redressal**

At the first level, complaints are submitted through the following mediums:

1. **Established points within the community** – These are locations and/or persons that are perceived by the affected group/community as highly respected, trustworthy, impartial and easy to talk to (Refer to Box 1).


   **Attention:**
   Permanent Secretary
   Public Utilities and Energy
   Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation
   Telephone #: 1-473-440-2271/2272
   E-mail Address: ps@moiid.gov.gd
   ministryofworksgnd@gmail.com

3. **Carriacou Multipurpose Resource Center** - A centrally located facility within Hillsborough Carriacou, heavily used by locals, within walking distance to the subproject site.

   **Carriacou Multipurpose Center**
   Hillsborough, Carriacou
   Telephone #: 1-473-443-8131
   E-mail Address: cmpec06@gmail.com

CARCIP’s Project Manager and Environmental and Social Safeguard Specialist will collect complaints from the above points on a regular basis and document them. The aforementioned officials will subsequently contact the concern person/s to address the stated grievances. If the complaint cannot be resolved at this level it is taken to the next level.

**Approach to receiving and recording of complaints**

Complaints can be made in writing, verbally, over the phone and via emails. They can also be made anonymously. Once the designated person/office identified above receives a complaint he/she/it would prepare a Receipt of Complaint as given in Appendix 2. The person receiving the complaint should try to obtain relevant basic information regarding the grievance and the complainant and will immediately inform the Project Manager and/or the Environmental and Social Safeguard Specialist in the format outlined in the Grievance Information Form (GIF) for additional details as shown in Appendix 3.
On receipt, the Environmental and Social Safeguard Specialist will immediately register the complaint in the Grievance Redressal Registration and Monitoring Sheet and review same in collaboration with the Project Manager of CARCIP. Contact\(^5\) will be made with the affected person/complainant to (i) find out additional information as needed and (2) to begin to find a solution to the complaint received.

If necessary, meetings will be held with the concerned/affected persons/complainant and the Digicel CARCIP representatives/officials to find a solution to the problem and create plans to redress the grievance. The deliberations of all meetings and decisions taken are recorded. All meetings in connection with Redressal of Grievance including the meetings of the Grievance Redressal Committee will be recorded in established formats (Refer to Section 2.4.2). Community representatives or representatives of the complainant will be allowed to sit in meetings that relates to the grievance.

The resolution at the first tier will normally be done within 14 working days during which time the complainant is notified of the solution adopted through a disclosure form (Refer to Appendix 4). If the grievance is not solved within this period, it would be referred to the Second (2) Tier of Grievance Redressal. However, if the Project Manager and Environmental and Social Safeguard Specialist are of the opinion that progress is being made towards a solution, a decision may be taken to retain the issue at this first level. **If the issue cannot be resolved within 21 working days, it will be transferred to the next level automatically.** The complainant may also request that the issue be transferred to the next level, after the 14 days period, if he or she feels it is not being addressed.

To ensure transparency and the effective flow of information to the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation, it is strongly recommended that an electronic Case Management System be developed and installed\(^6\) to support the reporting associated with this project. This system allows reports, including simple complains or suggestions shared by community stakeholders to be logged in one central place within Government. This documentation is important for future reference and to avoid the repudiation of complaints. Uploading of the information into the online system would be the responsibility of the Environmental and Social Safeguard Specialist and the CARCIP Project Manager.

### 2.4.2 Second Tier of Redressal

A Grievance Redressal Committee (GRC) will be formed that will consist of members of the Ministry of Infrastructure Development, Public Utilities, Energy, Transport and Implementation and the Ministry of Social Protection and Digicel CARCIP Grenada. This committee will be chaired by the Permanent Secretary of the Ministry of Public Utilities and Energy or designate.

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5 This can be done via telephone, email and/or face to face meetings.
6 This would be the responsibility of Government.
Terms of Reference of GRC

The Terms of Reference of the GRC are as follows:

1. Prioritize grievances and resolve them at the earliest possible time.
2. Advise the Project Manager and Environmental and Social Safeguard Specialist on grievances, including serious cases at the earliest to ensure an amicable solution.
3. Provide timely and proper relief and support to the affected persons.
4. Ensure that the affected persons receives proper and timely.

The Project Manager with assistance from Environmental and Social Safeguard Specialist will coordinate the convening of the meetings of the GRC. They will be responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both the parties (Complainant and the Project).

The GRC will hold the necessary meetings with the affected party / complainant and the concerned officers and attempt to find a solution, acceptable at all levels. GRC would record the minutes of the meeting.

The decisions of the GRC are communicated to the complainant formally and if he/she accepts the resolutions, the complainant’s acceptance is obtained on the disclosure format. The GRC has the option of conferring with other relevant authorities to secure a reasonable solution for the complainant.

It is expected that the complaint will be resolved at this level in a maximum of 60 working days. If the affected party / complainant does not agree for the resolution at the 2nd level or there is a time delay of **more than 60 working days in solving** the issue, the complainant can opt to consider taking the matter to the courts.

2.4.3 World Bank Grievance Redress Service (GRS)

The Complainant has also the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. World Bank Procedures requires the complainant to express their grievances by writing to World Bank office in Washington DC.

This GRS complaint form which can be found at the following URL link: [http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5](http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5) may be used. Complaints will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

**Email:** grievances@worldbank.org  
**Fax:** +1-202-614-7313  
**By letter:** Please send to:  
**The World Bank**  
Grievance Redress Service (GRS)  
MSN MC 10-1018 NW, Washington, DC 20433, USA
2.5 General Information

2.5.1 Building Awareness on the GRM Structure

As part of the pre-implementation project sensitization efforts within the community, the Digicel CARCIP Team working in collaboration with the Environmental and Social Safeguard Specialist will share information to households and residents of expected project activities. This would include information on the office to contact, if there is a grievance. Flyers containing information about the project and the point of contact for grievances would also be posted at strategic points within the community.

The Environmental and Social Safeguard Specialist will also brief the following of the GRM and explain the procedures for receiving, documenting and resolving any grievance submitted:

- Staff of the CARCIP office, Office of the Permanent Secretary and the Carriacou Multipurpose Center;
- CARCIP Digicel Office; and the
- Community representatives or point of contact.

A community meeting and/or community walk-around will be undertaken to share information on the grievance mechanisms and hear stakeholders views on the project. A flyer of the updated GRM will be posted at strategic points including all avenues where complaints can be made.

2.5.2 Reporting

The Environmental and Social Safeguard Specialist will prepare the Quarterly Reports on the Grievance Redressal issues of the Project and share with the CARCIP office and Digicel CARCIP Grenada.

2.5.3 Periodic review by the Grievance Redressal Committee

The Grievance Redressal Committee may review the nature of grievances that have been represented and if grievances are repeated, recommend suitable changes in implementation procedures recommended these to the Project Management for consideration.

2.5.4 GRM Jurisdiction

This is a project specific GRM and applicable to solve the concerns of the stakeholders of the Project. This is however not intended to bypass Governments own redress process; it is intended to address affected people’s concerns and complaints promptly, making it readily accessible to all segments of the affected people and is scaled to the risks and impacts of the Project.
## Appendix 1 – Community Point of Contact/Leaders

<table>
<thead>
<tr>
<th>Name</th>
<th>Position/Title</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ian Alexander</td>
<td>Shopkeeper, Resident of Conference</td>
<td>418-2154</td>
</tr>
<tr>
<td>Joseph Matthew</td>
<td>Loan Officer, Resident of Conference</td>
<td>414-7978</td>
</tr>
<tr>
<td>Windel Sylvan</td>
<td>Resident, Conference</td>
<td>457-7028</td>
</tr>
<tr>
<td>Raymond Burke</td>
<td>Digicel Grenada</td>
<td></td>
</tr>
</tbody>
</table>
Appendix 2 - Receipt of Complaint

Subproject Site Location: .................................
Complaint received: ☐ Verbally ☐ By Phone ☐ Email ☐ Letter/Written

Complaint No. ................ Date of Complaint (dd/mm/yyyy): .................

Location Where Complaint is Made: ............................................................

Name of Person Receiving Complaint: .................................................

Signature of Person Receiving Complaint: ..............................

Details of Complainant
Name of Complainant: .............................................. Sex (M/F) Age: ...... Years

Address of Complainant: ......................................................

Phone no. .................................................... Email Address: ...........................................

Documents comprising the complaint: (petition, letter, pictures etc.)

1. 
2. 
3. 

Summary of Complaint ........................................................................
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........................................................................................................

Category of complainant: ☐ Affected person ☐ Mediator for affected person ☐ Civil society organization ☐ Other (Specify) .................................

Signature of Complainant: ............................................................
Appendix 3 - Grievance Information Form (GIF) (For additional Details)

Complaint Registration No. ............... Date of Complaint (dd/mm/yyyy): ................

Date of Follow up with Complainant: (dd/mm/yyyy): ............... 

Method of Follow up: □ Phone □ Meeting □ Email □ Other (Specify)

Details of Complainant
Name of Complainant: .............................................. Sex (M/F) Age: ...... Years

Address of Complainant: ..............................................

Phone no. .............................................. Email Address: ..............................................

Additional Details of grievance:
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....................................................................................................................................................
....................................................................................................................................................

Prepared by: .............................................. Signature: ..............................................

Date: ...........................(dd/mm/yyyy)
Appendix 4 - Meeting Record Format – (Grievance Redress Committee (GRC) and Other Meetings

Subproject Site Location: .................................. Complaint Register No: ....................

Date of the Meeting: (dd/mm/yyyy).........................

Venue of meeting: .................................................................

Name of Participants:

<table>
<thead>
<tr>
<th>Complainant</th>
<th>Project/Government (include position)</th>
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Summary of Grievance: ...........................................................

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Notes on Discussion: .................................................................

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Decisions taken in the meeting/Recommendations of GRC: ......................

...........................................................................................................

...........................................................................................................

...........................................................................................................
Issue Solved /Unsolved _______________________

Name of Chair Person: ...........................................

Signature of Chair Person of the meeting: ...............................

Date: ...........................(dd/mm/yyyy)
Appendix 5 - Disclosure Form

Subproject Location: .........................  Parish : .................................

Result of Grievance Redressal

1. Complainant Registration No.:
2. Name of Complainant:
3. Address of Complainant
4. Date of Complaint:
5. Summary of the Complaint:
6. Summary of Resolution:
7. Resolved at First Tier/Second Tear/Other (Specify)
8. Date of Redressal of the Grievance: (dd/mm/yyyy)

Name and Signature of the Complainant in acceptance of the Solution to his/her Grievance

Name: ........................................................................

Signature of Complainant: ..............................

National ID number: ........................................

Name of Project Coordinator:

Name: ........................................................................

Signature .................................................................

Date: (dd/mm/yyyy): ..............................................

Name of Environmental and Social Safeguard Specialist
## Appendix Tracer Matrix for Grievances

<table>
<thead>
<tr>
<th>Main Project</th>
<th>Date grievance submitted</th>
<th>Nature of concern</th>
<th>Indicator(s) or Evidence of concern</th>
<th>Name &amp; Sex of complainant</th>
<th>Person in charge response (relevant state rep)</th>
<th>Site visit/communication</th>
<th>Critical intervention routes</th>
<th>Feedback from engagement</th>
<th>Results or Actions following engagement</th>
<th>Duty bearer for follow up</th>
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