



**Grievance Redress Mechanism
For
OECS Regional Health Project**

GOVERNMENT OF SAINT VINCENT AND THE GRENADINES

JULY, 2020

Ministry of Finance, Economic
Planning, Sustainable Development, and Information Technology
1st Floor, Administrative Centre, Bay Street, Kingstown,
St. Vincent and the Grenadines
Tel.: 784-457-1746 • Fax: 784-456-2430 • E-mail: cenplan@svgcpd.com

Table of Contents

Acronyms	3
1. Introduction	4
2. Project Description.....	5
Governance.....	7
3. Definition of Grievance Redress Mechanism.....	8
Types of Grievances	8
Levels of Grievances.....	9
4. Guidelines To Grievance Redress.....	10
5. Grievance Redress Steps	12
Notification	12
Registration Of Grievance	13
Addressing A Grievance	14
Monitor and Follow Up.....	15
Reporting.....	15
Storing of Grievances	15
6. Institutional Arrangements	16
7. The Grievances Redress Committee	17
Roles OF MEMBERS OF GRC	18
8. Review and Monitoring Of Grievance Redress Mechanism	19
Best practices:.....	19
Annex 1 Grievance Registration Form	21
ANNEX 2 Contractual Arrangement	22
Annex 3 - Grievance Register	23
Annex 4 EXAMPLE OF GRIEVANCE RESOLUTION FORM	24

Acronyms

CARPHA - Caribbean Regional Public Health Agency
CDC - Center for Disease Control and Prevention
CERC - Contingency Emergency Response Component
CMO - Chief Medical Officer
EOC - Establishment of a Health Emergency Operating Centre
FM - Financial Management
FELTP - Field Epidemiology Training Programme
GoSVG- Government of St. Vincent and the Grenadines
GRC - Grievance Redress Committee
GRM- Grievance Redress Mechanism
ICT- Information and Communication Technologies
MOF- Ministry of Finance
NTRC - National Telecommunications Regulatory Commission
NEMO- National Emergency Management Organization
OP- Operational Policy
OECS - Organization of Eastern Caribbean States
PAI - Project Area of Influence
PAHO - Pan American Health Organization
PAP - Project Affected Persons
PEF - Pandemic Emergency Financing
PPP- Public Private Partnership
PS - Permanent Secretary
PSC - Project Steering Committee
PSIPMU- Public Sector Investment Programme Management Unit
SET- Safeguards Team
WB - World Bank

1. Introduction

The Government of Saint Vincent and the Grenadines has received funding from the World Bank for the execution of the OECS Regional Health Project. The project will be implemented jointly with Grenada, St. Lucia, Dominica, the Caribbean Regional Public Health Agency (CARPHA) and the OECS Commission. The main objective of the project is to strengthen the country's capacity and capability in its preparedness, response, and recovery from public health emergencies such as infectious disease outbreaks, extreme events and other climate change risks.

The World Bank's Operational Policy (OP) 4.12 requires that persons affected by the project (PAP) should be meaningfully consulted and should have opportunities to participate in planning and implementing program. OP 4.12 recommends that a Grievance Redress Mechanism (GRM) be created to address all concerns. The GRM is an effective tool for early identification, assessment and resolution of complaints. The Government of St. Vincent and the Grenadines recognizes a GRM as an integral tool in the development process. In the country's National Economic and Social Development Plan (2013-2025), Goal three (3) promoting good governance and increasing the effectiveness of public administration, outcome 3.3 solicits avenues to educate the public about their legal rights and avenues for redress.

The GRM provides the residents of Saint Vincent the Grenadines, an opportunity to voice complaints or concerns, and to clarify and resolve misconceptions about the project activities. It provides a simple transparent and timely manner in which they can voice their opinion or grievance related to the execution of project activities.

2. Project Description

The OECS Regional Health Project will consist of four components as follows:

Component 1: Improved Health Facilities and Laboratory Capacity

This component will focus primarily on the renovation of health facilities at the community level and the construction of a public health laboratory. Three health facilities will be renovated and upgraded to PAHO SMART hospital standards. This will be geared towards the continuation of health care delivery at the community level in the event of natural disaster. The laboratory capacity of St. Vincent and the Grenadines will be strengthened with the construction of the new public health laboratory. The lab will focus mainly on the public health disease outbreak testing and confirmation. Other activities under this component will include training, implementing a laboratory information system and commissioning of two laboratories at the community level.

Component 2: Strengthening Public Health Surveillance and Emergency Management

This component will support efforts to strengthen public health preparedness, including surveillance and emergency response through improvement of national and regional capacities and promotion of cross-border collaboration. Additionally, it will strengthen national and regional emergency management and response capacities to respond swiftly and effectively to outbreak threats. The interventions will provide support to improve country and regional surge capacity to ensure rapid response during an emergency, including those induced by climate change. The main activities to be implemented under this component are:

- The basic Frontline and Basic Field Epidemiology Training Program (FELTP) and training in vector control programs
- Establishment of a health Emergency Operating Centre (EOC)
- Construction and retrofitting of isolation units
- Development of medical waste plan

- Development of health disaster management plans

Component 3: Project Management & Capacity Building

Component 3 will support the critical building blocks for strong implementation and coordination required for implementation of the project. Specific institutional capacity building activities will include technical assistance for contract management, procurement, financial management (FM), environmental and social safeguards, monitoring and evaluation, and project audits. With respect to project management and coordination, this component will finance personnel for project execution and regional coordination platforms for knowledge sharing among the implementing entities and collective monitoring of implementation status. All project related operating expenses and equipment will be financed under this component.

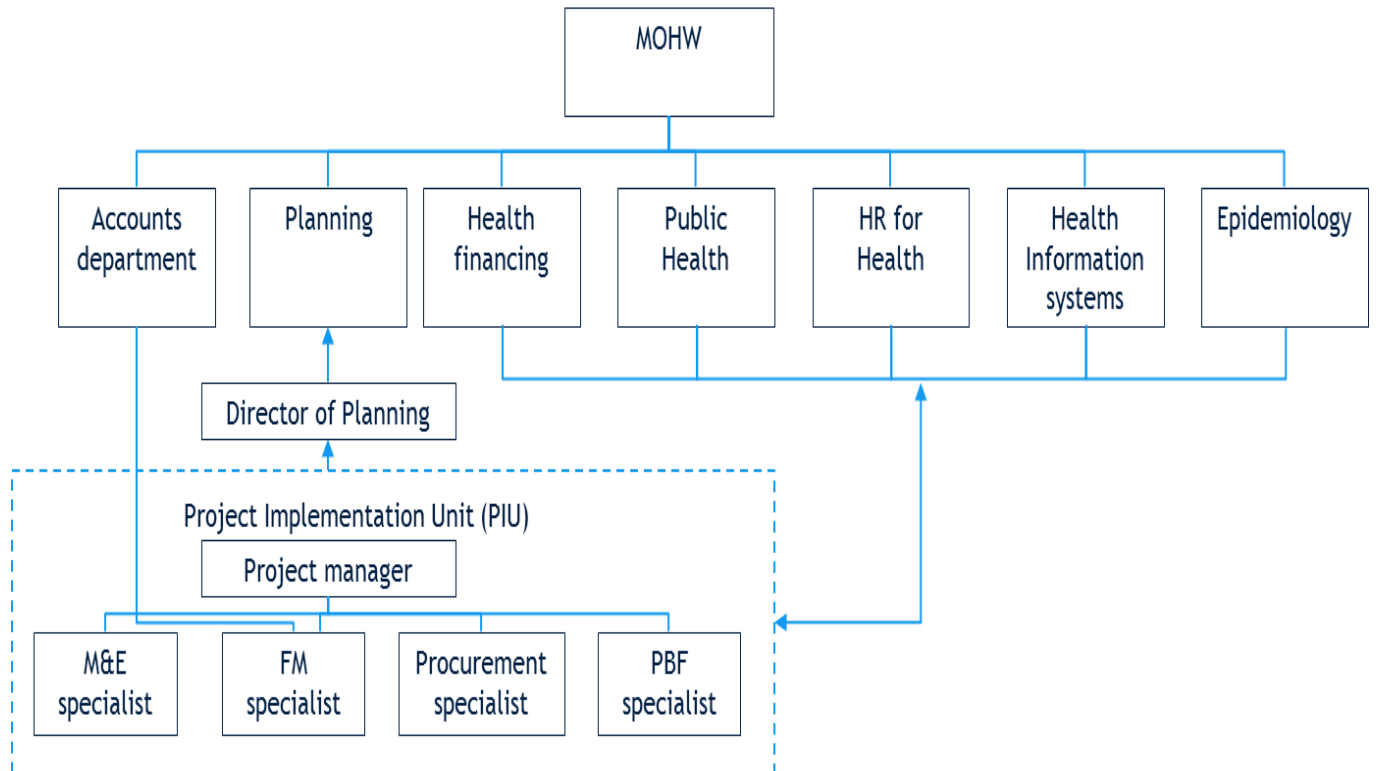
Component 4: Contingency Emergency Response Component (CERC)

This zero-cost component aims to provide immediate surge funding in the event of a public health emergency, such as a disease outbreak. The CERC is only triggered in the case of a public health emergency and when certain actions, as agreed by the Government and Bank teams, are met. These actions can include: (i) the country declares a national public health emergency; and (ii) presents a sound and actionable country-level response plan. Having the CERC in place provides a compelling platform for country-level discussions on the importance and need for country-level readiness to respond to disease outbreaks.

Once triggered, the CERC is implemented following the exceptional policy requirements set out in Paragraph 12 of the IPF Policy (Projects in Situations of Urgent Need of Assistance or Capacity Constraints) and enables rapid reallocation of funds between project components following an emergency. Together with the operational, fiduciary, procurement, disbursement and financial management arrangements that underpin its implementation, the CERC provides a conduit for flow of PEF funds (in the form of grant funds) into the project. Details on triggering the CERC in terms of definition of a public health emergency is defined in the respective Financing Agreement as well as described in a CERC Operations Manual.

Governance

The diagram below depicts the institutional arrangement for the OECS Regional Health Project. The overall responsibility of ensuring that the mitigation measures under this ESMP are implemented are with the PIU and the Project Coordinator. The figure below provides an overview of the structure that will support and implement the OECSRHP Project as a whole.



3. Definition of Grievance Redress Mechanism

A Grievance Redress Mechanism (GRM) refers to methods and processes by which a redressal to a grievance is sought and provided. Its design can be specific to a project or it can build on existing institutions and processes whether they are formal or informal. GRMs are designed to benefit both the project and the project affected persons (PAPs).

A *grievance* refers to an issue, concern, problem or claim, whether actual or perceived, that affects the physical, social and economic conditions of individuals and or communities in the project area of influence. They can occur at different stages of the project cycle. The project activity often determines the nature of the grievance.

Grievances can occur at various stages in the project cycle:

- **Inception** – complaints about the perceived impact (social, economic, environmental)
- **Implementation** – complaints about construction noise or dust, displacement or land acquisition, compensation etc.
- **Close** – non-fulfillment of project activities

Types of Grievances

Aggrieved persons can file different types of complaints depending on the specific issue or concern of the project beneficiaries. These may include and not limited to:

- Land Acquisition
- Temporary Access
- Lack of Access
- Disruption of services Inadequate care
- Noise
- Dust or chemical pollution, waste management issues (solid or liquids)
- Lack of information

Non-fulfilment of contracts, levels of compensation, or seizure of assets without compensation shall be made in writing, and addressed to the GRC. Copies of the complaint shall be sent to the Project Coordinator.

Levels of Grievances

Category	Description	Personnel in Charge
Level 1	When an answer can be provided immediately and/or the safeguards team is already working on a resolution	SET Team & Project Coordinator
Level 2	One off event	SET Team & Project Coordinator
Level 3	Complaint is repeated. Any complaint that indicates breach of law or applicable policy/regulation High-profile grievances that if not resolved promptly may represent significant risks to the environment or community.	Grievance Redress Committee

4. Guidelines To Grievance Redress

Grievances can be made orally or in written form. The public, especially persons living in the project area of influence, must be informed about the project activities, as well as where they can lodge their concerns, who will be responsible and the timeframe of the response.

Who are the main actors?

Public Sector Investment Programme Management Unit (PSIPMU): The governing unit responsible for project execution, including the fiduciary and safeguard aspects of the project.

Project Coordinator: In charge of the management of the implementation of project, the Project Coordinator will receive all complaints. The aggrieved will be provided with a registration number and the timeframe within which he/she will be contacted by the social specialist assigned to the project.

Safeguards Team: A team comprising of social, environment and technical officers (SET Team) to provide communication and consultation to all beneficiaries.

Project Steering Committee: Committee of various stakeholders that provide guidance and direction of the project activities.

The Steering Committee shall comprise of the following members:

- The Director of Economic Planning (Chairman)
- The Permanent Secretary Ministry of Health, Wellness and the Environment
- The Permanent Secretary Ministry of National Security, Air and Sea Port Development
- The Chief Medical Officer
- Health Disaster Coordinator
- Representative - National Emergency Management Organisation

- Representative - Ministry of Finance, Economic Planning Sustainable Development and Information Technology
- Representative - St. Vincent and the Grenadines Standards Bureaus
- The Project Coordinator

a. The Chair may invite other technical personnel to advice the Committee from time to time.

Grievance Redress Committee: To facilitate all appeals. The committee comprise of the

- Director of Planning;
- Chief Medical Officer (CMO)/ Health Planner/ Health Disaster Management Director
- Permanent Secretary Ministry of Health;
- Project Coordinator;
- Government Legal Officer,
- Safeguard Team; (Health Grievance Redress Officer)

5. Grievance Redress Steps

Notification

The Project Coordinator shall ensure that proper and timely notification about the GRM is provided, utilizing all relevant and available medium.

PROCESS:

A notification about the project's GRM is to be placed on the project sign board and should also be provided via the following medium:

- a) On radio via public service information
- b) Flyer distribution in the project area
- c) Newspaper
- d) All possible public media
- e) On Government website

After the final demarcation of a project site, a sign post would be erected to notify the public about the project development. On the sign post, a rectangular portion would be allocated to provide information on where to direct all grievances. A sample is shown below.

Sample Notification to the Public on how to submit grievance

All grievances relating to this project are to be directed to:

The Project Coordinator

<Name of the Project>

OECS Regional Health Project

<Ministry >

Ministry of Finance, Economic Planning, Sustainable Development, and Information Technology

<Ministry address>

First Floor Administrative Building, Kingstown

<Relevant contact info: telephone, email>

Telephone: 784-457-1746

Email - cenplan@svgcpd.com

All grievances relating to the isolation and mobile units for COVID 19 are to be directed to:

Roselle Solomon

Health Project Grievance Officer

OECS Regional Health Project - Isolation Facility

Ministry of Health, Wellness and the Environment

First Floor Ministerial Building, Kingstown

Telephone: 784 534 4325

Email - mohesvg@gmail.com

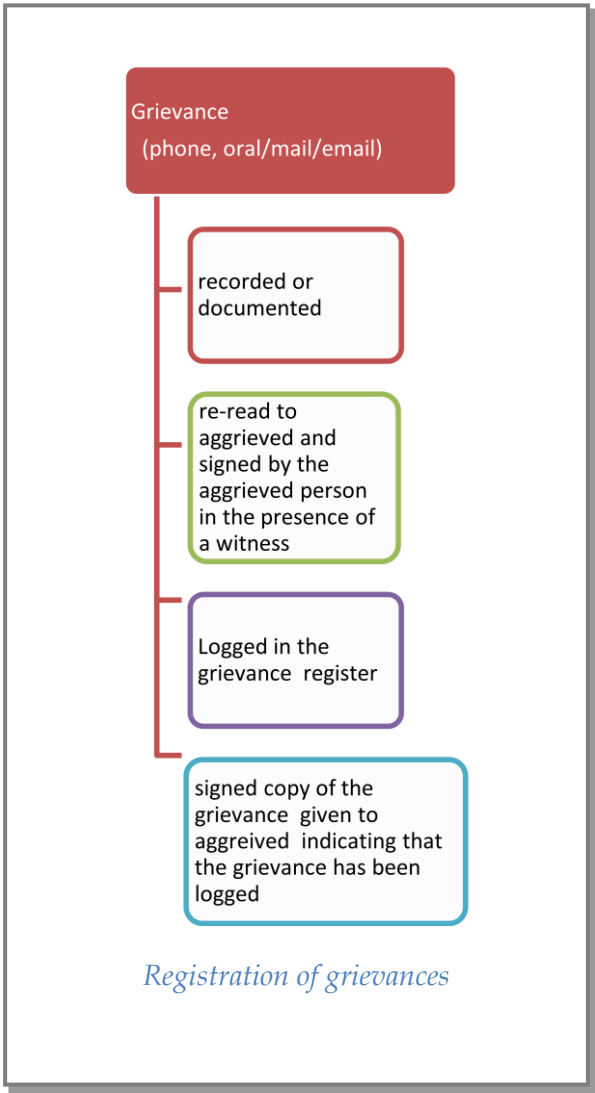
Registration Of Grievance

a) All grievance representations received under the project, (via, telephone, mail, e-mail, in-person or through a third party) should be recorded on a grievance registration form (Annex 1). The grievance registration form¹, should be dated by the Project Coordinator, who will assign a registration number to the

What information is needed?

- Identify the project
- Identify who you are (provide contact information (optional)
- State how the project activity affects you or your community
 - Suggestion how it can be resolved

aggrieved person and lodge the grievance in the grievance register² (Annex 3).



b) Grievances can be submitted without providing your name or contact details with the understanding this might make resolution difficult in some cases. If the grievance registration form is not available, the following key information should be noted:

- The project name
- Name of person lodging the grievance (if provided)
- Contact information of affected person (if provided)
- State how the project activity affects you or your community. A grievance registration number must be given to the aggrieved

c) When practicably feasible, the Project Coordinator must: (i)inform the aggrieved of the name, designation, office and telephone number of the safeguard team member responsible for processing the complaint; (ii) inform the aggrieved individual that the safeguards team member will contact the person within 10 business days³.

¹ See annex 1 for grievance form

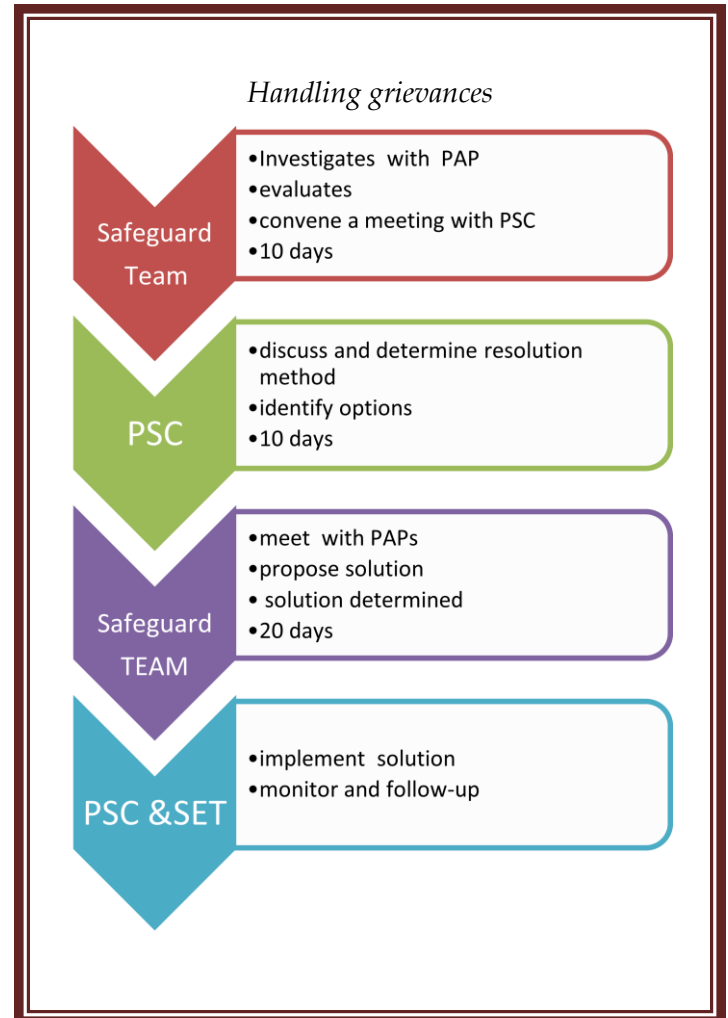
² See annex 3 for log, log should commence at the beginning of all new project

³ The assigned safeguard personnel should contact the aggrieved.

Addressing A Grievance

- (i) No grievance is to be rejected..
- (ii) The Safeguard Team (SET) will contact the aggrieved person, investigate and evaluate the grievance and provide a response to the grievance within ten (10) business days of receipt.

- (iii) If grievance is beyond the scope of the SET , the team will seek the input and guidance of the relevant technical stakeholders/experts. along with the other relevant concerned Ministry (e.g. Chief Surveyor - land Acquisition issues). The appropriate personnel would ascertain the period (not exceeding Thirty (30) business days) necessary for the Project Steering Committee to address the grievance. The aggrieved person must receive notification regarding the status of grievance on or before the end of the thirty (30) business days.



- (iv) If the aggrieved person does not receive a response or is not satisfied with the outcome within the agreed time, he/she can lodge his/her grievance directly to the Grievance Redress Committee (GRC).
- (v) The SET Team should monitor and follow up these grievances to enable timely attention.

Monitor and Follow Up

The SET will contact the aggrieved within one month after the resolution to verify that the outcome was satisfactory and gather any feedback on the grievance process. The Grievance Resolution Form shall be signed by the aggrieved and saved in database.

Reporting

The grievance log will be maintained throughout the life of the project it will store information outlining the number of grievances, time to resolution and outcomes of grievances. All information will be communicated to the Project Steering Committee monthly/quarterly reports as well as the World Bank's team. The GRM may be evaluated and updated when required, to continually improve its stakeholder engagement.

Storing of Grievances

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed in the PIU database to ensure privacy and confidentiality is maintained for all parties involved.

At any time a grievances can also be filed with the World Bank's Grievance Redress Service (GRS) at :

<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

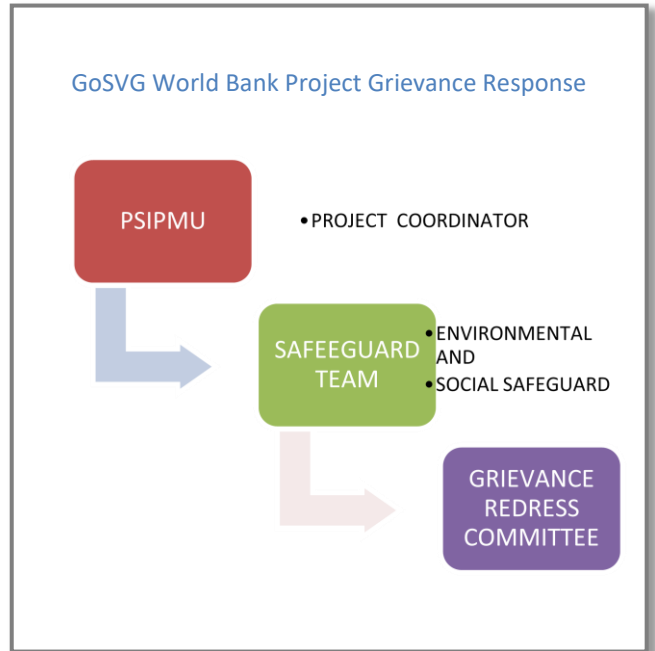
Additionally the complainant can take the complaint through the formal legal system for resolution.

Grievance regarding (a) appointment scheduling, or having to wait a long time for service or appointment; (b) disrespectful or rude behaviour by health sector personnel will be referred to and addressed by the Permanent Secretary in the Ministry of Health.

The Project Coordinator must review the website daily to check for complaints.

6. Institutional Arrangements

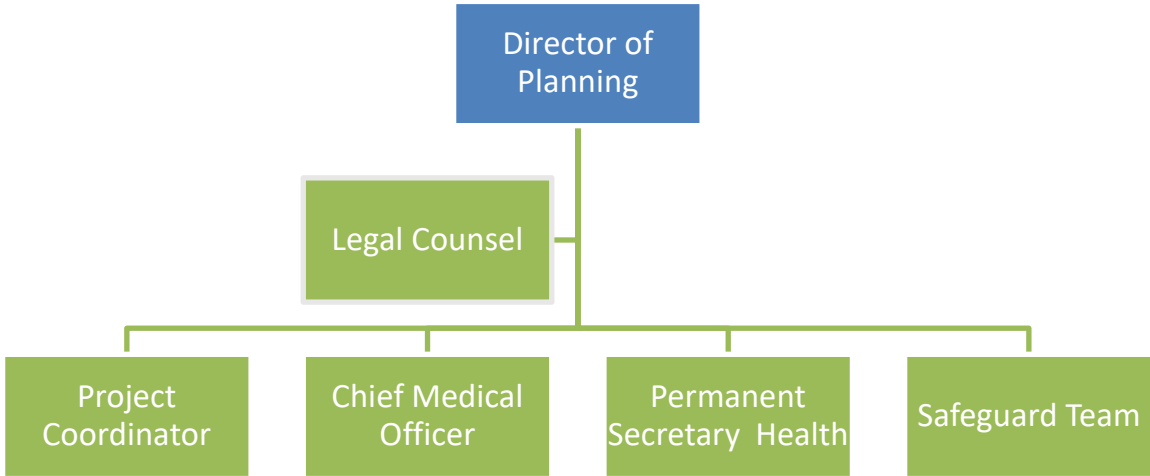
- I. During the life cycle of the OECS Regional Health Project where safeguards are monitored by the PSIPMU, the assigned Project Coordinator will receive, and log all grievances. Grievances will then be transferred to the social safeguards team (SET) for investigation.
- II. If the recorded grievance is outside the scope of the SET, then the SET will forward the matter to the Grievance Redress Committee (GRC), for resolution.
- III. If the grievance cannot be resolved by the GRC then the matter will be directed to the Attorney General.
- IV. The PSIPMU will continuously monitor grievance handling and report outcomes to the Project Steering Committee (PSC).



7. The Grievances Redress Committee

The Grievance Redress committee would be headed by the Director of Planning. The other members of the Redress Committee includes: the Project Coordinator, Permanent Secretary Ministry of Health, Chief Medical Officer, Government Legal Counsel for OECS Health Project, officers from the safeguard team. Other officers would be co-opted as necessary based on the nature of the grievances.

Composition of Grievance Redress Committee



Roles OF MEMBERS OF GRC

The role of the members of the GRC is outlined below:

Director of Planning	<ul style="list-style-type: none">• Responsible for the overall decision of the committee
Legal Counsel	<ul style="list-style-type: none">• Provide guidance as it relates to the Law of the Country and the Rights of the Citizens
Project Coordinator	<ul style="list-style-type: none">• Provide information regarding the project activity affecting the PAP
Permanent Secretary Health	<ul style="list-style-type: none">• provide direction and guidance on the project
Chief Medical Officer	<ul style="list-style-type: none">• provides status information and clarification regarding the nature of the project activity .
Safeguard Team	<ul style="list-style-type: none">• Liaison for the PAP , represent the best interest of the PAP , ensure World Bank Guidelines are followed, provides explanation for compensation to the PAP, monitor , provides guidance regarding best options to minimize adverse effects from the project

8. Review and Monitoring Of Grievance Redress Mechanism

Ensure meaningful review of the performance of grievance redress process of the project. The Project Coordinator should ensure that all grievances are addressed within one month.

Best practices:

- The better method to redress a grievance is not to allow the grievance to arise in the first instance:
- When project sites have been identified, a consultation and information session will be scheduled with residents to discuss the nature of the project and to note and address any concerns on the project development.
- Identify areas susceptible to grievance generation and identify possible opportunities or alternatives. Recommendations should be made and discussed with Project Coordinator [*where necessary discussion with Project Steering Committee*], if the grievance cannot be avoided, then compensation or alternate options should be communicated to the potential aggrieved individual.
- On the determination of the project site, screening should be conducted for boundaries, agriculture produce, and other assets subject to be affected by the project. When identified, discussion should be undertaken with Project Coordinator [*where necessary discussion with Project Steering Committee*], to minimize grievance.
- Deal with every grievance in a fair, objective and just manner.
- Track grievance (number received, number resolved)
- Develop and issue booklets/pamphlets about the schemes/services available to the public indicating the procedure and manner in which the grievances can be availed and the right authority to be contacted for service for example the Project Coordinator, the Ministry of Agriculture for crops and the Lands and Surveys Department for land issues.

- At the end of all sub-projects, the Project Coordinator should meet with the SET to ensure that all grievances and compensation are resolved.

Annex 1 Grievance Registration Form

DATE:

REGISTRATION OF GRIEVANCE

Please use capital letters:

Contact No: _____-

Name: _____

Address: _____

Name of Project Site:

As per the OECS Regional Health Project , Grievance Redressal, I register my grievance as detailed:

“Details of Grievance”

(a) Outline reasons why and how you are affected by the project. (overleaf if necessary)

(b) If land or other properties are being affected e.g. (agriculture) , include copies of relevant documentations you have to support your claim.

List documents: attach copies

(a) (b) (c) (d)

Undertaking: I hereby certify that statements made in my Grievance and documentation enclosed are true and complete to the best of my knowledge. If at any time any part of the Grievance or the documentation is found to be false, I will be liable for any legal action that the Government of St. Vincent and the Grenadines may deem necessary.

Date: _____ (Signature of aggrieved person) _____

Name _____ of _____ recording Officer: _____

(Signature) _____

(Please print)



ANNEX 2 Contractual Arrangement

MEMORANDUM OF UNDERSTANDING FOR THE TEMPORARY USE OF LAND OR OTHER FACILITIES DURING PROJECT CONSTRUCTION

The following agreement has been made on..... day of..... between.....resident of(the Owner) and _____.(the Recipient).

1. That the Owner holds the transferable right of acres/square feet of land/structure/asset in.....
2. That the Owner testifies that the land/structure is free of squatters or encroachers and not subject to other claims.
3. That the Owner hereby grants to the Recipient this asset for the construction and development offor the benefit of the villagers and the public at large.
(Either, in case of donation:)
4. That the Owner will not claim any compensation against the grant of this asset.
(Or, in case of compensation:)
5. That the Owner will receive compensation against the grant of this asset as per the attached Schedule.
6. That the Recipient agrees to accept this grant of asset for the purposes mentioned.
7. That the Recipient shall construct and develop the.....and take all possible precautions to avoid damage to adjacent land/structure/other assets.
8. That both the parties agree that the.....so constructed/developed shall be public premises.
9. That the provisions of this agreement will come into force from the date of signing of this agreement.
10. This agreement shall be valid for a period not exceeding -----

Signature of the Owner

Signature of the Recipient

Witnesses:

1. _____

2. _____

(Signature, name and address)

Annex 3 - Grievance Register

Notes:

- 1 Complainants should be provided with acknowledgement of grievance within 7 days from the date of receipt (the social specialist should insert the number of days that the project has allocated for acknowledgement of grievance, which should vary from 2-7 days. For simple issues, complaints /queries should be responded to within this allocated number of days).
- 2 Expected time of redress should be entered in this register.
- 3 Records of Grievances should always be entered in the GR Register and updated as needed, until the grievance is settled.
- 4 Grievances should normally be settled within 4 weeks of initial receipt. If not, reasons for delay should be communicated to the complainant and entered in the Register. (The social specialist should insert the number of weeks allocated for settling grievances under the project, which should vary from 2 weeks to one month. The same approach as detailed above in Note 1 should be followed).

Grievance Details

Claim Number	Name of sub project Site	Date Complaint Received	Name & Contact Information of Person Making Complaint (optional if the complainant wishes to be anonymous)	Date of Acknowledgement of Receipt of Complaint (issue involve) (informing complainant of response time) / Response to Complaint for Simple Issues	Actions Taken to Resolve Complaint	How Complaint Resolved	Date Complaint Resolved	If Not Resolved, Date Sent for Appeal	Status of Appeal	Date Resolved	Level of Grievance

Annex 4 EXAMPLE OF GRIEVANCE RESOLUTION FORM

Name:

Address:

Company: (if applicable):

Date:

Time:

Preferred Contact Method:

Gender:

Telephone:

Email:

Please provide contact details: _____

Supporting documents attached⁴? Yes No

I _____ hereby agree to that
Print Name

Please describe process
was the measure that was negotiated and implemented to my satisfaction.

If dissatisfied, what outcome are you seeking?

⁴ Supporting documents includes copies of cheques, pictures, permission etc.

BACK OF FORM

Additional Information

Aggrieved Signature:

Date:

Office Use Only

Aggrieved Person Reference:

Received By:

Forwarded to Safeguard Team on (Date): _____