

«LEARNING ENVIRONMENT – FOUNDATION OF QUALITY EDUCATION PROJECT» (LEARN)

GRIEVANCE REDRESS MECHANISM MANUAL

I. Introduction

Purpose of the Manual

This document serves as a comprehensive guide outlining the procedures and principles governing the resolution of grievances within the «Learning Environment - Foundation of Quality Education Project» (LEARN, Project). The purpose of this manual is to outline the Grievance Redress Mechanism (GRM), the roles and responsibilities of key stakeholders, the processes for submitting and resolving grievances, and the measures in place to protect the confidentiality and privacy of individuals involved.

Overview of the Grievance Redress Mechanism (GRM)

The main objective of the GRM is to facilitate the timely, effective and efficient resolution of grievances and the satisfaction of all parties involved. In particular, the GRM provides a transparent and credible process to achieve fair, efficient and sustainable results. The GRM also builds trust and cooperation as an integral component of broader public consultation to support corrective action. The GRM complies with the requirements of the Law of the Republic of Tajikistan “About Applications by Individuals and Legal Entities” and the World Bank ESS10 “Interaction with Stakeholders and Disclosure of Information” and covers the provisions of the Law of the Republic of Tajikistan “On Appeals of Individuals and Legal Entities”.

This manual describes the transparent process for GRM submissions from impacted communities and other stakeholders. This mechanism is intended to consider requests received from external stakeholders. The internal GRM for Project developers will be discussed separately in the document “Procedures for regulating labor relations” (PRLR) and developed by the Ministry of Education and Science and the project working group (RPG) LEARN Goals of the GRM:

- Provide a reliable channel for feedback from the stakeholders;
- Register, verify, review, monitor and respond to received complaints or inquiries related to social, environmental and other issues related to the activities of the Project;
- Find mutually agreed solutions, satisfying Project and the Parties affected by the Project, and resolve any complaints/appeals on the spot through consultations with the affected party;
- Facilitate in development process at the local level, maintaining transparency and establishing a level of accountability to the Affected Party of the project;
- Provide up-to-date information to all Project stakeholders upon their request;
- Provide an opportunity to provide feedback;
- Avoids the need to resort to judicial proceedings.

II. Scope and Applicability

Stakeholders

The GRM is designed to address the concern of all external stakeholders involved or affected by the Project. The GRM applies to:

- Project beneficiaries (Schools, teachers and administrative staff of educational organizations and schools, students, parents and caregivers);
- Representatives of central and local government and public bodies;
- Media;
- Direct and contract workers involved in construction and other work under the Project;
- Other stakeholders affected by the Project (List may be updated as needed).

Grievance and appeals submission modalities:

Appeals may be submitted through various channels, as detailed below. Contact details for appeals can be found in Appendix XX:

- Oral submission
- Written submission
- Collective letter
- Telephone submission
- Short Message Service (SMS)

Telephone submission (992 37)227-76-86; Fax:(992 37) 221-70-41

Email submission to the Project website: www.maorif.tj, : **E-mail: mort@maorif.tj**/

Utilizing Feedback Systems of the Ministry of Education and Science

- Leveraging feedback systems of local government agencies
- Utilizing the World Bank Feedback Systems at grievances@worldbank.org

Anonymous appeals are accepted and processed if the appellant chooses not to disclose personal details. The GRM will ensure access and confidentiality of the grievance mechanism and ensure that the complainant does not fear possible retaliation

III. GRM levels

Regional level: The regional level includes complaints and other types of feedbacks that may be received upon implementation of project's events activities at the district's level. This level provides complaints and other types of grievances that may be received during the implementation of project activities at the district level. At each project site and local community, a box will be installed for submitting complaints and other grievances.

Grievances can be submitted in the District Education Department (DED), as the body responsible for project implementation at the district level, with the administration of the project schools, or through the contractor. In each project area, on the basis of districts education departments, a group will be established to consider and resolve the appeals, which will include a representative of the local Government, a representative from District Education Department (DED, and a regional representative of the project. If the appeal has the nature of a complaint, the timeframe for resolving the issue, depending on its complexity, should not exceed 15 days after receipt. All appeals must be registered and considered in accordance with the established procedures.

Complaints and suggestions can be submitted to the designated contact of the LEARN project

Social development specialist Tel: (+992) 888892929 (WhatsApp, Telegram)

Environmental specialist Tel: (+992)888896600 (WhatsApp, Telegram)

Phone number: (992 37)227-25-69

Fax:(922 37)227-25-74 Fax:(922 37)227-25-74 Fax:(922 37)227-25-74

Web site: www.maorif.tj

E-mail: project.learn@maorif.tj

If the issue cannot be resolved at the district level, the complaint's review will be transferred to the central level. PIU social and gender specialist should check GRM status with District Education Department (DED), local project engineers, project contractors in weekly base.

Central level: If a situation arises in which there is no response from the regional level or if the response is not satisfactory, then it automatically directed to central level. PAPs providing feedback have the opportunity to directly contact the LEARN Project Center for follow-up action The National Complaints Committee (NCRC), which includes representatives of:

- Deputy Minister of Finance of the Republic of Tajikistan.
- Deputy Minister of Education and Science of the Republic of Tajikistan.;
- Deputy Minister of Health and Social Protection of the Republic of Tajikistan;
- Deputy Minister of Labor, Migration and Employment of the Republic of Tajikistan;
- Deputy Chairman of the Committee on Women and Family Affairs under the Government of the Republic of Tajikistan;
- State Committee on Investments and State Property Management.
- NGO Representative
- Chairman of the Committee - Director of the Center for Communicative Services of the LEARN Project,
- Secretary of the Committee - Specialist in Social and Gender Issues of the Center for Communicative Services of the LEARN Project. The deadline for resolving a complaint at the central level will be 15 days from the receipt of a complaint that does not require additional study and investigation, and 30 days for appeals that require additional study. The applicant will be informed of the result immediately and at the latest within 5 days of the decision.

If the complaint is still not resolved to the satisfaction of the complainant, then he/she may file his/her complaint with the appropriate court.

IV. GRM for Workers

Internal grievance mechanism for the Project workers

In accordance with the requirements of ESS 2 Workforce and Working Conditions, the Project will implement a Grievance Redress Mechanism (GRM) for project workers. The GRM will be based on the existing national mechanism where, according to the legislation of the Republic of Tajikistan, the legal provisions reflected in the " Law of the Republic of Tajikistan on appeals of individuals and legal entities" are used. In essence, it will function at two levels - the first at the central level for the employees of the PIU and borrower and the other, at the regional level, for the employees of the contracting and consulting organizations. Complaints can be filed against actions or decisions of employers that, in the opinion of the complainant, have not been implemented or are being implemented in an unfair manner. Complaints may be filed anonymously and confidentiality will be maintained in all cases, including when the person making the complaint is known.

Structure of the GRM of employees

Regional level: The second level provides for the filing of complaints and other types of appeals, mainly from employees of contracting organizations. The Contractor will appoint a contact person

responsible for reviewing and processing complaints. If the issue cannot be resolved at the contractor level within 15 days, it will be escalated to the central level at the PIU.

Central level: Grievance redress group, chaired by the PIU manager, which includes representatives of the borrower/EA and the Labor Inspectorate under the Ministry of Labor and Employment of the Republic of Tajikistan. The PMU/PIG Specialist on Social Protection Measures will act as the secretary of the group responsible for reviewing and processing complaints. He/she will be responsible for summarizing the number and types of all complaints and questions received from the project staff from the target regions.

The deadline for resolving a complaint at the central level will be 15 days from the receipt of a complaint that does not require additional study and investigation, and 30 days for appeals that require additional study. The applicant will be informed of the result immediately and at the latest within 5 days of the decision.

If the complaint is still not resolved to the satisfaction of the complainant, then he/she may file his/her complaint with the appropriate court.

Meanwhile, each project contractor should have GRM log book for direct and indirect workers on place. Project engineer, supervision consultant and PIU social and gender specialist check the GRM status on weekly base.

V. Grievance and appeal submission process

Information about the GRM will be publicized as part of the public awareness campaigns. Brochures and leaflets will be displayed in the target project districts, EA departments targeted jamoats, if appropriate, and local governments information boards, etc. GRM leaflets will also be posted online on the borrower's websites and social media webpages. The overall process for the GRM will be comprised of six steps, as described below.

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: contacting PIUs by mail, telephone, email, social media and messaging.
- **Step 2: Sorting and processing.** Complaints and feedbacks will be compiled by the Social Specialists at the PIUs at central or regional offices and recorded in a register. These are assigned to the respective individuals / agencies to address. They are expected to discuss/ deliberate with the complainant and arrive at a resolution, within 15 working days of receipt.
- **Step 3: Acknowledgement and follow-up.** Within five (5) working days of the date a complaint is submitted, the responsible person/ agency will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. If complaints are not resolved within 15 days, the responsible person will provide an update about the status of the complaint/question to the complainant and again provide an estimate of how long it will take to resolve the issue.
- **Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution, which could include changes of decisions concerning eligibility for mitigation, assistance, changes in the program itself, other actions, or no actions. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both

those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.

- **Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. The respective PIU will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved, or pending. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions.
- **Step 6: Providing Feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person (communicating by telephone or other means).

If the complainant is not satisfied with the resolution, s/he will be informed of further options, which would include pursuing remedies through the World Bank, as described below, or through avenues afforded by the Republic of Tajikistan legal system. *On a quarterly basis*, the respective PIU will report to borrower on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days. Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in semiannual reports to the World Bank.

Grievance Logs will include at least the following information:

- Individual reference number
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously)
- Details of the complaint, feedback, or question/her location and details of his / her complaint.
- Date of the complaint.
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution
- Date when proposed resolution was communicated to the complainant (unless anonymous)
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution
- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out
- Date when the resolution is implemented (if any).

VI. Handling sensitive complaints

The Project will make use of additional consideration of sensitive complaints. Considering the standards for the prevention of GRM that the World Bank requires to be met in all World Bank-

financed projects, these standards will be followed and responsibilities will be taken to raise awareness about the prevention and suppression of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). These complaints will be addressed without delay and all perpetrators will be held accountable. SEA/SH issues will require some additional measures:

- Gender sensitivity will be sought in the recruitment of the social worker who will be employed;
- Social workers will be informed about SEA/SH issues;
- In addition to socio-cultural sensitivity and non-violent ways of communication in worker's training, SEA/SH will also be on the agenda;
- Definition of violence against women in national and international documents;
- Types of violence (physical, sexual, economic, emotional);
- Legal sanctions;
- GRM will be available and should ensure confidentiality of personal information.
- - Awareness raising activities will be conducted to inform women about the mechanism. The following types of information will be provided during these activities;
- The following types of information are provided in these studies:
 - Women's rights
 - Self-defense in cases of violence and sexual violence
 - Emergency phone numbers
 - Contact information of institutions and organizations they can reach
 - GRM and Confidentiality Policy
- The principle of confidentiality of the GRM will be repeated in all information materials.

According to the Law of the Republic of Tajikistan “On Citizens’ Appeals”, as well as in accordance with Articles 4, 5 and 6 of the Law of the Republic of Tajikistan “On the Acceleration of Citizens”, grievance must be reviewed within 15 days of its registration. The Project Coordinator was developed by the Ministry of Education and Science of the Republic of Tajikistan (MOI) based on the project (LEARN) shall notify the complainant of the grievance review results within 15 days from the date of registration. The complex issues that remain unresolved and require the involvement of other parties for consideration may be extended up to 30 days. Complainants can also contact confidentially, the Ministry of Education and Science of the Republic of Tajikistan must ensure non-disclosure of the name and specific information of the complainant. Complaints data or original complaint logs will be provided to World Bank missions upon request, and summary of complaints and decisions must be included in periodic reports to the World Bank.

VII. Complaint monitoring and reporting

The monitoring complaint management will be done through a set of indicators to ensure that complaints are resolved effectively and in a timely manner. Indicators will be measured during reporting periods. Every month, district project coordinators are required to submit their reports to the M&E Specialist, who with the active assistance of the Specialist on Social Development, under the overall supervision of the Project Coordinator, prepare monthly summary reports on the functioning of the GRM for the management of the MOES and semi-annual reports for the World

Bank. The report covers all requests directly or indirectly related to the implementation of the project, including types of requests, methods and places of submission, responses speed, statistics, status of complaints review, etc.

Responsibility for complaint's resolving and control over compliance with deadlines entrusted to the Ministry of Education and Science of the RT and the Project Representative. M&E and Social Development specialists will be responsible for summarizing the number of complaints received at the central and regional levels, loading them into project database, maintaining statistics and recording resolved/unresolved complaints. As an indicator for measuring the success of the project, a parameter can be included - the number of complaints submitted and resolved.

VIII. Public awareness campaigns

The Ministry of Education and Science will conduct campaigns to widely inform the public about the implementation and functioning of the GRM under the Project. A web page about the Project will be created on the MoES website and information about the GRM will be posted. The online feedback mechanism will also function as a GRM, allowing users to post comments or lodge complaints. Contact details of the responsible persons will also be available on the project web page. Information boards and boxes for complaints, reviews and suggestions will be installed on the territory of each project site.

In order to familiarize Project beneficiaries with the channels and procedures for resolving complaints, the MoES will develop and distribute information materials in the form of brochures and booklets in Tajik and Russian, which, in addition to basic information about the project GRM, should contain contact information.

GRM activities will be financed under Component 3 of the LEARN Project. Based on preliminary needs, the budget will cover the following activities: travel, development and printing of information materials, costs of media coverage, installation of information boards and complaint boxes, information and training campaigns.

The Ministry of Education and Science will conduct public awareness campaigns on the implementation and functioning of the GRM within the project. A website dedicated to the project will be established on the MoES website and information on the GRM will be posted. The online feedback mechanism will be also functioned as a GRM, allowing users to submit comments or complaints. Contact details of the responsible persons will also be posted on the project's website. Information panels and boxes for complaints, reviews and suggestions will be installed in each site.

In order to familiarize the project beneficiaries with the channels and procedures for resolving complaints, the MoES will develop and distribute information materials as brochures and booklets in Tajik and Russian languages in which, in addition to basic information on the project GRM, should contain contact information.

The events on GRM will be funded under Component 3 of the Project LEARN. Based on preliminary requirements, the budget will cover the following activities: business trips, development and printing of information materials, media coverage, installation of information boards and complaint boxes, conducting information and training campaigns.

IX. Service on Handling Complaints Service

Communities and individuals, who believes that project, implemented with support of WB negatively impacted to them, can also submit a complaint to existing grievance redress mechanism in project level or contact the World Bank Grievance Redress Service (GRS) directly via following link:(<http://www.worldbank.org/en/projects-operations/products-and-services/gievance-redress-servi>) or Permanent Representation of the WB in the Republic of Tajikistan: str. Aini 48, Business Unit "Sozidanie", 3rd floor tel.: e-mail : [tajikistan @ worldbank.org](mailto:tajikistan@worldbank.org)

The complaint must clearly identify the adverse impact (s) allegedly caused or likely to be caused by the Bank-supported project. This should, as far as possible, be supported by available documentation and correspondence. The complainant can also indicate the desired outcome of the complaint. Finally, the complaint must identify the complainant (s) or designated representative (s) and provide contact details. Grievances filed through the GRM are dealt with promptly so that issues related to the project can be resolved quickly.

X. Confidentiality and privacy: this must include handling sensitive information and data protection measures

Grievance registration log: add a section on how the information is registered and filed

XI. GRM budget

All costs associated with resolving complaints and claims (meetings, consultations, communication and reporting/dissemination of information) will be covered by the Ministry of Education and Science of the Republic of Tajikistan. Costs associated with submitting complaints to court will also be covered by the MOES.

Contact information for submitting appeals to the central office of the Ministry of Education and Science

Postal code and address:	Nisormuhammad 13-a, Tajikistan, Dushanbe, 734021
E-mail:	mort.@maorif.tj
Phone number:	(992 37) 227-76-86; Fax:(992 37)221-70-41
Website:	Ministry of Education and Science : www.maorif.tj
The contact person	Hayotzoda Abdurahmon

Contacts of the Working Group of the LEARN project

Postal code and address:	Nisormuhammad 13-a, Tajikistan, Dushanbe, 734021
E-mail:	E-mail: project.learn@maorif.tj
Phone number:	(992 37)227-25-69; Fax:(922 37)227-25-74
Website:	www.maorif.tj
The contact social development specialist	Komilzoda Mavjuda (+992) 888892929 (WhatsApp, Telegram)
The contact environmental specialist	Abdurarhimov Bozor (+992)888896600 (WhatsApp, Telegram)

Sample application (complaints, requests, and suggestions) of the beneficiary Project

to whom _____
(Head of institution)

Dear _____
(Full name of the head)

from whom _____
(Applicant's full name)

living _____
(Applicant's address)

STATEMENT

(Detailed information about yourself, place of residence, type of activity)

Purpose of the application _____
(Information about the existing problem and its causes)

Ways to solve the problem _____

(I ask....., for this or that action/inaction, I complain..., I suggest)

Applicant's signature _____
(Last name and first name of the applicant)

(Date of)

Phone _____

E - Mail (if available) _ _____

Location: _____
