

TAJIKISTAN
HIGHER EDUCATION PROJECT
GRIEVANCE REDRESS MECHANISM

I. Background

The Grievance Redress Mechanism (GRM) for the Higher Education Project (HEP) was developed by the Ministry of Education and Science of the Republic of Tajikistan (MOES) on the basis of the Project Appraisal Document (hereinafter referred to as PAD), the Financing Agreement (hereinafter referred to as FA), the Laws of the Republic of Tajikistan “On Citizens’ Appeals” and “On Civil Service” as well as the Instructions of the Government of the Republic of Tajikistan “On the Procedures of Records Management on the Appeals of Citizens”. The GRM document describes the procedures to file grievances, their registration and review, monitoring over the implementation of decisions on grievances and reporting with deadlines and responsible units/persons given the HEP specific nature and its needs. In addition, the document describes the activities to disseminate the information about the GRM.

II. GRM Core Principles

The GRM was developed based on the following principles:

1. *Simplicity and accessibility.* Procedures to file grievances, and seek action were simplified as much as possible so that the project beneficiaries can avoid excessive red tape and complexity. Project beneficiaries have a range of contact options including, at a minimum, a telephone number, an e-mail address, and a postal address. The GRM is accessible to all project participants, irrespective of the remoteness of the area they live in, the language they speak, and their level of education or income.
2. *Objectiveness and independence.* The GRM operates independently of interests of all stakeholders in order to guarantee fair, objective, and impartial treatment to each case.
3. Если процедура удовлетворения жалоб не даст результатов, лица подавшие жалобы все еще могут прибегнуть к судебному решению вопроса. Procedure of grievance redress doesn't replace legal processes. On the basis of consensus, procedures will help to resolve quickly issues to accelerate receiving right, without resorting to long trials. If procedure of satisfaction of grievance doesn't yield results, persons made grievance still can resort to judgment of question.
4. Mechanisms of satisfaction of grievance are developed with purpose of solution of *disputes at early stages* that will be in interests of all concerning parties.

III. Procedures to File Grievance

Grievances can be filed both verbally and in writing. In addition, citizens may use the GRM as a way to obtain additional information from the project or to provide feedback on the project implementation. GRM can also be used to file grievance regarding the concerns about the situations associated with the use of child and forced labor ([CFL](#)) in the project-related activities.

The grievances are reviewed in accordance with Articles 4, 5 and 6 of the Law of the Republic of Tajikistan “On Citizens’ Appeals (the Law) with one reservation: it will be possible to review grievances filed anonymously to the MOES under the Project.

Complainants¹ can file their grievances to the MOES of RT, as the main government authority in charge of the HEP implementation. In addition, grievances can also be filed to the Executive Office of President (EOP) and Inter-ministerial Steering Committee (IMSC)² which was created for the implementation of the grant program under the Project as well as the universities participating in the Project. The list of the main grievance uptake locations and contact information are provided in Attachment 1.

Complainants are able to file their grievances through various means including: postal address, e-mail, telephone, website, SMS, grievance and feedback boxes at the grievance uptake locations. Appeals posted in the mass media should be subject to review in accordance with the Law on the press and other mass media.

IV. Procedures for Registration and Review of Grievances

The grievances filed under the Project are registered in accordance with the existing procedures for grievance registration. Thus, grievances filed to the MOES, regardless the method of submission, are recorded in the Grievance Registration Logbook (GRL) in the General Division of the MOES. After that, they are forwarded to the Head of the Division for Legal Support and Secretariat (DLSS) in the MOES who designates the persons in charge of grievances. The package is thereafter cleared by the Minister, and further goes back to the DLSS for entering information into the GRL and distribution among the designated responsible persons. In complicated cases, a specialized commission to review the grievances is created. Representatives from MOES and IMSC will be members of aforesaid commission and will review a complaint. The grievances related to the HEP are also filed to the Project Secretary and additionally registered in the Project Grievance

¹ A legally capable individual, group of individuals, a legal entity, a group of legal entities can file a grievance, inquiry or any appeal

² For grievance related to the grant programs

Registration Logbook (PGRL). Attachment 2 contains sample registration and control cards and PGRL outline. All information about an individual grievance (communication, minutes, etc.) is stored in a separate folder for this grievance.

Basic information about a grievance comprises the following:

- Date of submission of grievance;
- Complainant's contact information (if available);
- Basis of a grievance;
- Person in charge of grievance review;
- Date of sending information on proposed solution of issue to person made grievance
- Date of closing of grievance; and
- Date of sending of answer to person made grievance.

The documentation for each specific case, both in paper and electronic format, will be generated and properly maintained in accordance with paragraph 11 of the Instructions "On the Procedures of Records Management on the Appeals of Citizens".

Grievances received in other locations (EOP, IMSC, HEIs, etc.) should also be registered in accordance with established procedures. Given the nature of a grievance, it will be reviewed by the received authority and redirect to MOES. The MOES should be notified of the grievance related to the Project, unless the grievance is confidential and it should be logged in the PGRL. In cases where the MOES itself is the object of the grievance or if the grievance is filed confidentially the case should be reviewed by the authority that received the complaint or other relevant authorities.

Grievances filed to the authorities whose mandate does not include the resolution of the issues raised in the grievance, should be forwarded by them within 5 days to the authorities to whom it is relevant (including MOES). The complainant should be notified about the re-direction of the complaint. In accordance with the Law it is prohibited to redirect grievances to the authorities or officials, for the actions or inactions and decisions of which the complaints were received.

In accordance with the Law, a grievance should be reviewed within 15 days from the date of its registration and the complainant should be notified by HEP Project Coordinator about the results or progress of the grievance review within not more than 15 days from the date of grievance registration. In the case of complex issues that require the involvement of other parties, the timing for the review may be extended to one month. The DLSS, MOES and Project Coordinator are responsible for monitoring of compliance with deadlines.

V. Reporting

The Coordinator and Secretary/Translator shall prepare monthly reports on the implementation of GRM for the MOES management, and quarterly reports for the World Bank. The report should cover all grievances, directly or indirectly related to the project implementation, and should provide an overview of grievances including the types of grievances, ways and locations to file grievances, rates of response, statistics of grievance redress, etc. **The reporting will also highlight complaints related to CFL.** In addition, the report should include an annex with the following detailed information:

- Nature of the grievance.
- Available information on the complainant (including demographic – student, parent, gender, etc.)
- Information on where the grievance was received and in what format.
- Information on the status of the grievance (resolved, under review, etc.).
- Information on how resolved grievances were resolved.
- Information on unresolved grievances and why they are unresolved.

The report may also include recommendations for improving the GRM or project design. These recommendations should be based on the monitoring of the GRM, specifically its functionality GRM and the types of grievances that have emerged. A template to generate reports is in **Attachment 3.**

VI. Grievance Review Monitoring Procedures

In accordance with the MOES internal procedures, the monitoring of the grievance review both within and beyond the Project is entrusted with the DLSS. In addition, as part of the Project monitoring system, the M&E specialist monitors the implementation of the GRM. The GRM monitoring covers as part of the Project all grievances directly or indirectly related to the Project regardless of the format and the receiving channel of complaints. The GRM implementation monitoring includes, but is not limited to:

- Systematic analysis and summarization of the grievances as well as practical comments associated with them in order to timely identify and address the problems, and improve the performance of the institutions;
- Tracking any outstanding issues;
- Compliance with GRM principles and standards; and
- Preparation and submission of monthly reports to the Deputy Minister on Economic Issue, including analysis of grievance types, levels of grievance and actions taken on reducing number of grievances.

The M&E report on the GRM implementation is submitted to the MOES management and the World Bank on a quarterly basis.

Also, in accordance with the regulations, the prosecutor's office conducts annual inspections for compliance of the GRM implementation practices with the established procedures. However, the prosecutor's office report does not rank the grievances by source of activity financing under which the complaint was received.

VII. Disclosure of GRM Document

All materials describing the GRM once approved by the MOES and cleared by the World Bank will be made publicly available through posting them on the MOES's official website www.maorif.tj, disclosed in the mass media and disseminated as part of the Project communication activities. In addition, they will be shared with all participants of the Grant Programs. To make it available for students and faculty will be one of the key requirements for participation in the Grant Program. Materials include the GRM document itself and a brochure with basic information on GRM.

The GRM brochure will also include contact information on all grievance uptake locations as follows:

1. Name of location/channel to receive grievance.
2. Address of location.
3. Responsible person.
4. Telephone(s).
5. Email.
6. Days and hours for receiving verbal grievances.

It will also include a summary of the process for registering, reviewing and responding to grievances including the estimated response time. The information about the GRM will also be presented as a chart to make it easy for people to view. The materials will be produced in Russian and Tajik.

VIII. The World Bank's Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a project implemented with the support from the World Bank may submit their complaints to the existing project-level structures which are in charge of grievance review or to the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received be promptly reviewed in order to address pertinent concerns associated with the project. Affected communities and individuals may submit their complaint to the World Bank's Independent Inspection Panel, which determines whether harm occurred, or could occur,

as a result of World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been communicated directly to the World Bank as well as given an opportunity to the Bank’s management to respond. For information on how to submit complaints to the World Bank’s Corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank’s Independent Inspection Panel, please visit www.inspectionpanel.org. Brochures on the GRS in Russian are available here: <http://pubdocs.worldbank.org/en/344481455136920191/GRSRussianLowRes.pdf>.

Information about the World Bank’s GRS will be disseminated along with the dissemination of information about the GRM, and posted in the grievance redress centers of the Project.

Cost of GRM Information Dissemination

The costs of implementing the GRM are around USD 1000,00 annually (USD 6,000 in total) and include design of dissemination materials, administrative costs such as translation and dissemination of brochures and project materials, translation of the GRM monitoring reports for the WB

Title	Cost (per year)
Preparation of GRM-related materials (brochures, posters)	\$200
Translation of materials	\$150
Copying of materials	\$200
Administrative costs (project staff time, trips)	\$450
	\$1,000

These costs will be covered out of Project proceeds aside from the expenditures which are not eligible under the Project (e.g., salaries of civil servants). The latter should be covered by the MOES budget.

LOCATIONS FOR SUBMITTING GRIEVANCES

MOES:

Postal and physical addresses:	13A N. Muhammad Str. Dushanbe, Tajikistan, Dushanbe, 734021
Email:	moert.he@maorif.tj
Telephone Number:	+992 37 2214360, 2217041
Website:	MOES: www.maorif.tj
Contact person	Jumaev Jamshed

EOP:

Postal and physical addresses:	734021, 80 Rudaky Avenue, Tajikistan, Dushanbe
Email:	mail@president.tj
Telephone Number:	(+992 37) 221-70-82; 221-43-34; 221-66-81
Website:	www.president.tj
Contact person	Kamol Partovzoda

IMSC:

Postal and physical addresses:	13A N. Muhammad Str. Dushanbe, Tajikistan, 734021
Email:	odinaev_cdo@mail.ru
Telephone Number:	+992935880065
Website:	www.maorif.tj
Contact person	Bozorali Odiazoda

Complainants are able to file their grievances through various means including: postal address, e-mail, telephone, website, SMS, grievance and feedback boxes at the grievance uptake locations. (Information on location of feedback boxes will be disseminated as part of Project communication activities.)

VISITS RECORD CARD

“ ____ ” _____ 20 ____

Name _____

Address _____

Summary _____

Name and title of receiving officer _____

To whom, when and what is assigned _____

Results of inspection _____

When and who sent response _____

Date of grievance/feedback control lifting _____

SAMPLE TO CREATE REPORTS FOR GRIEVANCES

_____ “ _____ ” _____ 20 _____

Name _____

Address and other information _____

Summary _____

Format and location of grievance receipt _____

Information about grievance review progress _____

Results of inspection _____

Ways of grievance redress _____

Unresolved grievances and reasons _____

Recommendations
