

OECS Regional Health Project
and
Saint Lucia Health System
Strengthening Project

Grievance Redress Mechanism

Updated in November 2021

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Objectives of the Grievance Redress Mechanism (GRM)

- Provide information about project implementation and an avenue to comply with government policies.
- Provide a forum for resolving grievances and disputes at the lowest level before they escalate to an unmanageable level.
- Facilitate effective communication between the project and affected persons, building trust and confidence of community members in the project and creates productive relationships between the parties,
- Ensure equitable and fair distribution of benefits, costs, and risks.
- Mitigate or prevent adverse impacts of the project on communities and produce appropriate corrective or preventive action.
- Avoid project delays and cost increases and improve quality of work.
- Allow for project workers to access a mechanism to address and respond to their work-related grievances.

Some concepts important to grievance redress are defined below.

Term	Definition
Grievance	An issue, concern, problem, or claim (perceived or actual) related to the environmental and social performance that an individual or community group wants addressed by the Government and/or its contractors.
Redress	To correct, remedy, or relief actions associated to a project. These actions may include among others culturally appropriate, provision of information, delivery of services, monetary compensation, etc. depending on the type of grievance and the judicial systems and customary dispute mechanisms.
Grievance Redress Mechanism (GRM)	A formalized way to accept, assess, and resolve community complaints concerning the performance or behavior of the Government, it's contractors, or employees.
Project workers	(a) people employed or engaged directly to work specifically in relation to the project (direct worker)

- (b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers);
- (c) people employed or engaged by primary suppliers (primary supply workers); and,
- (d) people employed or engaged in providing community labor (community workers). (.

Stakeholders

individuals or groups who:

- (a) are affected or likely to be affected by the project (project-affected parties); an,
- (b) may have an interest in the project (other interested parties).

Responsibility for Grievance Redress

The Permanent Secretary in the Department of Health and Wellness (DoHW) has the overall responsibility for grievance redress. The Safeguards Specialist within the Project Implementation Unit (PIU) within the Department of Health and Wellness is designated as the Grievance Redress Mechanism (GRM) operator who will be responsible for its implementation, monitoring and reporting. If the position of safeguards specialist is vacant, temporary arrangements should be put in place and informed to the Bank to assign the responsibility of socialization, implementation, monitoring and reporting on the GRM to a PIU staff, until said position is filled. As regards the implementation, monitoring and reporting of the GRM, the main tasks of the PIU Safeguards Specialist are:

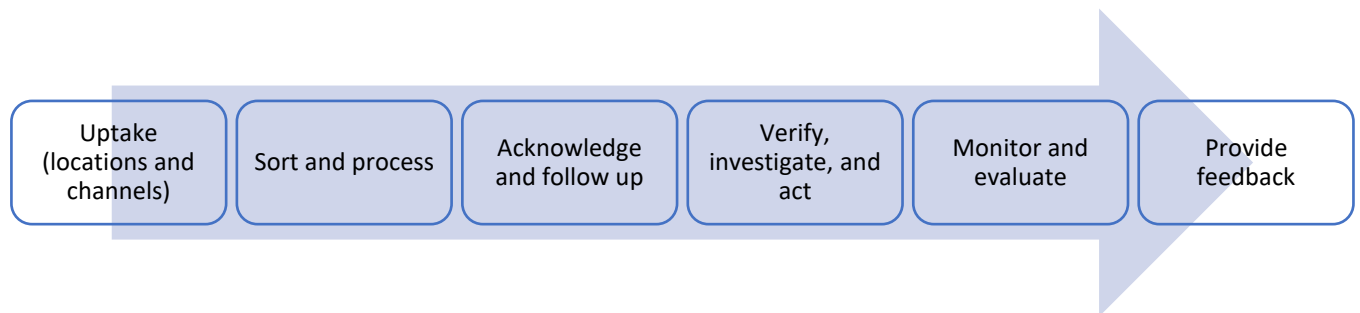
- Support the DoHW in establishing an accessible, transparent, efficient and harmonized GRM for project-affected people and other interested parties.
- Provide clarity, predictability and uniformity on how grievances, complaints, and concerns will be received, assessed, sorted, resolved, and monitored under the project.
- Coordinate the work of other actors involved in operating the GRM (contractors, consultants, service providers) and develop the capacity of PIU staff at various levels through training in order to enhance the effectiveness of the GRM.
- Coordinate the GRM Committee (when it needs to be established – please refer to section on SEA/SH grievances) to review and make decisions on complaints handling and redress issues.
- Create awareness of the GRM amongst all the stakeholders ensuring that the existence and procedures of the GRM are being communicated clearly and adequately throughout the entire project lifecycle to project-affected parties and other interested parties.

- Maintain records of allegations and grievances received and resolution and make these available to the World Bank upon request.
- Regularly contact all points of receipt of complaints, receive the complaints and assist in redressing all grievances by coordinating with the concerned parties and service providers.
- Monitor and analyze the performance and effectiveness of the GRM and report progress to the Permanent Secretary and the World Bank, informing of any complaint that is submitted to project authorities and preparing progress reports semiannually.
- In cases of SEA/SH allegations, allow for the immediate referral of survivors to available GBV service providers (using the mapping of GBV services and the referral process prepared by UNFPA – see **Annex 1: Listing of available services and points of service on GBV, including** contact information) regardless of whether the incident is project related or not.
- Provide a specific logging system for SEA/SH complaints (separate from all other cases) which will always collect only non-identifiable information to allow immediate, safe, and confidential reporting protecting the identity of the survivor.

Grievance Redress Mechanism Process

The following figure illustrates and describes each of the steps in the GRM complaint handling process. The aspects covered in each of the steps is also included below.

Figure 1: Steps in the Handling of Grievances



Steps in the Handling of Grievances Aspects to cover

Grievance uptake	Relevance and effectiveness of existing feedback channels, as well as the need to potentially expand them by creating additional channels (e.g. by adding a hotline, email address, social media platforms, modifying an existing website to allow for online submission of feedback, installing feedback/grievance boxes in relevant locations, etc.)
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Grievance channels that will be available under the project and how they will be made accessible to all project-affected parties, including vulnerable and marginalized groups.

Development of a standardized complaint form to be made available and used in relevant project locations, where appropriate.

Assign the responsibility of grievance uptake to the responsible party.

Grievance receipt, sorting and processing

Criteria to be used to establish the eligibility of complaints and to prioritize specific types of grievances (for instance based on urgency and risk, or sensitivity of the grievance)

Categories of grievances likely to be received under the project

Data points to be captured in the grievance log (e.g. nature of the complaint, channel through which it was submitted, geographical location of the complaint, gender, age and income level of the complainant, etc.)

Grievance acknowledgment and follow-up

Acknowledgment procedures of the complaint

Communication of next steps and fixed service standards to the complainant (e.g., number of business days within which the complainant can expect to receive a response including a proposed resolution, etc.)

Grievance verification, investigation and resolution

Procedure whereby complaints will be acted upon and a resolution proposed to the complainant

Grievance monitoring and evaluation

Procedure to ensure that all GM entries are recorded in a consolidated GRM log

Indicators to be monitored continuously to assess the performance and effectiveness of the GM

Provision of feedback

Appeals system for complainants that are dissatisfied with the response received and desire to contest it

Design and implementation of a complainant satisfaction survey to measure the degree of satisfaction of complainants with various aspects of the process (e.g. length of proceedings, quality of communication, etc.) and the proposed resolution of their grievance

Available channels to submit grievances

- 1) **Phone Number: 758-468-6432.**
- 2) **Postal mail:**
*Permanent Secretary
Grievance Redress Mechanism (GRM)
Attention to Safeguards Specialist HSSP & OECS Regional Health Projects
Project Implementation Unit
Department of Health and Wellness
2nd Floor, Sir Stanislaus Building, Waterfront, Castries*
- 3) **Email address: mohgrievances@govt.lc**
- 4) **In person at the project office:**
*Project Implementation Unit – safeguards specialist
Department of Health and Wellness
2nd Floor, Sir Stanislaus James Building, Waterfront, Castries*

The PIU Safeguards Specialist will receive grievances submitted by phone, mail, email or in person. He/she will monitor the email for grievances and respond to the phone. If another member of the PIU responds the phone, he/she will immediately notify the PIU safeguards specialist.

As soon as the PIU Safeguards Specialist receives a complaint, she/he will acknowledge receipt. In the case of anonymous complaints this will not be possible but confidential/anonymous grievances will be accepted when received through these channels.

When receiving complaints over the phone or face to face, the PIU Safeguards Specialist will try to obtain relevant basic information regarding the grievance. All complaints will be registered in the Grievance Register (see **Annex 3: Grievance Registers**).

The PIU safeguards specialist will engage with other professionals of the MOHW to address the grievance and provide a response. He/She will notify the Project Manager of any

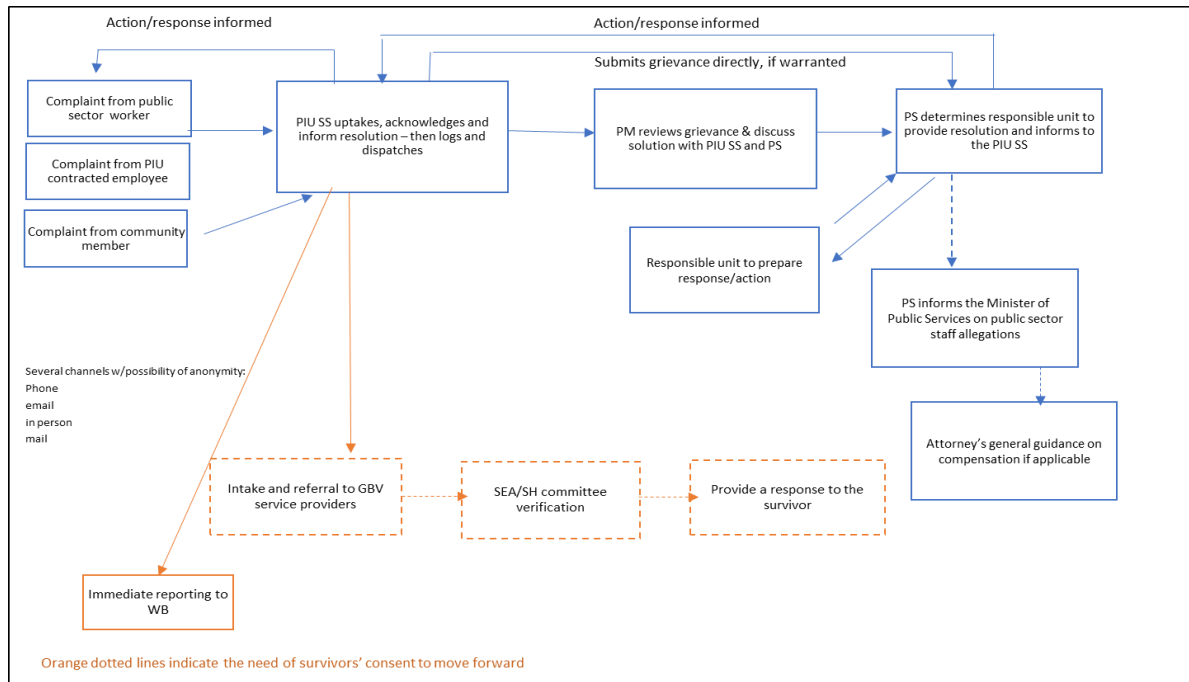
grievance received who, in turn, informs the Permanent Secretary who is the ultimate responsible for the GRM.

If the nature of the grievance warrants it, the PIU safeguards specialist can bring the complaint directly to the attention of the Permanent Secretary, without notifying the Project Manager.

Within 5 days of the Permanent Secretary receiving the complaint (through the Project manager or directly from the Safeguards Specialist) a response will be prepared by the relevant unit or department which will then be given to the PS Office who will within 5 days of receiving it will forward to the PIU Safeguards Specialist who will log the response and take charge of contacting the complainant with the response. If the complainant agrees with the resolution, the PIU Safeguards Specialist will undertake the necessary steps to implement the solution and monitor it. If the complainant does not agree with the proposed resolution, the PIU Safeguards Specialist will discuss alternative solutions with the complainant, technical personnel involved, PM and PS, until a satisfactory resolution can be achieved.

Meetings with the affected persons / complainants will be held to find a solution to the complaint. The deliberations of the meetings and decisions taken will be recorded in the format provided in **Annex 4: Meeting Record Format**. The **Annex 5: Grievance Closure Format** will be used to describe and record the closure of the complaint.

Figure 2: Grievance Redress Mechanism Flowchart



Direct and contracted project workers shall submit their grievances through the existing public service mechanisms or those of the contractors or consulting firms; however, if those channels are not considered sufficient or effective by the project workers, this GRM shall provide an alternative channel to submit their grievances and having them adequately and timely addressed. Project workers shall be informed of the grievance mechanism at the time of recruitment and shall not receive any reprisal for its use. The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

For all allegations submitted by *public workers* (seconded), the Permanent Secretary of the DOHW will immediately notify the Ministry of Public Service. For allegations involving *contract employees* hired by DOHW (PS signatory) PS is required to commence investigation within 5 days of receipt of the complaint and hold a disciplinary hearing within 30 days of receipt of complaint. The PS will ensure all the principles of natural justice are followed. The PS is required to notify the complainant of the decision of the disciplinary hearing within 5 days of the outcome of the disciplinary hearing on all PIU staff allegations. For both categories, where there are considerations for compensation the PS seeks the advice of the Attorney General.

World Bank Grievance Options

The Complainant will be informed that he/she also has the option of approaching the World Bank at any time. World Bank Procedures requires the complainant to express their grievances writing to World Bank Grievance Redress Service 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> may be used. Complaints will be accepted by email, fax, letter, and by hand delivery to the Grievance Redress Service (GRS) at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org

Fax: +1-202-614-7313

By mail:

The World Bank

Grievance Redress Service (GRS)

MSN MC 10-1018NW

Washington, DC 20433, USA

Other General Obligations

Building Awareness on GRM Structure:

The PIU will initially brief all the staff of project office, the sub-projects including consultants and contractors, and activities and the staff of the implementing Ministry, on the GRM of the Project explaining the procedures and formats to be used including the reporting procedures and the actions required after logging a complaint.

The PIU and its contractors will be responsible for informing the community and civic leaders of the project communities on the GRM and explain the procedures to be used if they wish to file a complaint.

The GRM will also be published on the DoHW webpage, the Government of Saint Lucia official website and/or project webpage. A project site board will be erected on the sites of sub-projects indicating both the existence of the project GRM (including all contact details: phone number, email and address for further information) and the complaint filing details of any contractor where complaints can also be made.

Reporting.

The Project Manager will include into the Quarterly Reports the number of complaints received and the status of their resolution based on inputs provided by the PIU Safeguards Specialist.

GRM Jurisdiction.

This is a project/s specific GRM and applicable to solve the concerns of the stakeholders which arise due to the actions of the project. The GRM is not intended to replace or bypass Government's other redress process or to prevent individuals from using the court system to seek redress.

Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person's rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

Relevant concepts for the GRM in relation to SEA/SH are defined below.

Term	Definition
Consent	Refers to approval or assent given voluntarily and freely, after thoughtful consideration. To give consent, individuals must have access to all relevant facts at the time they give their consent, and they must be able to evaluate and understand the consequences of any action.
Gender	Roles that are determined socially, behaviors, activities, and attributes that a society considers appropriate for men and women. These roles are contextual and influenced by a society's culture and traditions, as well as by prevailing religious beliefs.
Gender Based Violence (GBV)	Any act of violence that results in, or the nature of which causes, physical, sexual, or psychological harm or suffering to someone because of his or her sex. This including threats through similar acts, coercion, or arbitrary deprivation of liberty, whether in public or private life. (UN, 1993).
GBV service provider	An organization offering specific services for GBV survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services etc.
Perpetrator	A person (or group of persons) who commits an act of SEAH, or other type of crime or offense. Potential perpetrators of SEAH can

be any personnel associated with the project and may include not only construction workers, but also Consultants and project staff supervising the civil works or undertaking technical assistance activities or studies, or the security guards hired to protect a project site, as well as staff of the Implementing Agency¹

Sex:	Refers to the biological and physiological characteristics which differentiate men and women.
Sexual Abuse	Real or threatened physical intrusion of a sexual nature, whether it be by force or under unequal or coercive conditions.
Sexual Exploitation	Any real or attempted abuse of a position of vulnerability, power differential, or relationship of confidence for a sexual purpose, including, but not limited to, taking financial, social, or political advantage of another through sexual means.
Sexual Harassment	Unwelcomed sexual advances, demand for sexual favors, or any other verbal or physical behavior of a sexual nature. In the workplace, submission to these advances or behaviors may be made either implicitly or explicitly a condition of continued employment, promotion, or other decisions affecting a person's employment.
Survivor	A survivor is a person who has experienced SEA or SH. The term 'survivor' is generally preferred to the term 'victim' in the psychological and social support sectors because it implies resilience. ²
Survivor-Centered Approach	Is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors - who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's rights, safety and confidentiality are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to

¹ World Bank. *Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Major Civil Works. Good Practice Note. Environmental and Social Framework for IPF Operations.* Washington, DC: World Bank. 2020, pg. 9.

<http://pubdocs.worldbank.org/en/632511583165318586/ESF-GPN-SEASH-in-major-civil-works.pdf>.

² Inter-Agency Steering Committee (IASC). (2015). *Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action: Reducing Risk, Promoting Resilience and Aiding Recovery*, p326.

make decisions about possible interventions. This approach is particularly critical when working with women and girls whose rights, for example to be free of violence, make independent decisions, and enjoy bodily integrity, are not supported in their families, communities or societies.

Dealing with SEA/SH grievances

SEA/SH allegations related to WB financed projects can be reported, just like any other project-related grievance, using the available project-level GRM channels. The PIU safeguards specialist logs the SEA/SH allegations, acknowledges their receipt, and takes the following mandatory actions:

ACTION 1: Complaint intake and referral

If the survivor gives consent, the PIU safeguards specialist fills in the **complaints form (Annex 2)** excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)
- The survivor's age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the PIU Safeguards Specialist refers her/him to relevant Gender Based Violence (GBV) service providers, identified in the mapping of GBV service providers carried out by UNFPA (**Annex 1**) and according to preestablished and confidential referral procedures **Error! Reference source not found.** The survivor's consent must be documented even if it is received verbally (see **Annex 6: Consent Form for SEA/SH Survivors**). The GBV service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The PIU safeguards specialist will keep the survivor informed about any actions taken by the perpetrator employer. If the survivor has been referred to the relevant GBV service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the PIU Safeguards Specialist can close the case.

ACTION 2: Incident reporting

The PIU Safeguards Specialist needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Project Manager who will in turn inform the World Bank Task Team Leader (TTL) or directly to the TTL. **Annex 3** includes the key pieces of data which must be collected and shared.

Complaint Forms and other detailed information should be filed in a safe location by the PIU Safeguards Specialist. Neither the PIU safeguards specialist nor the Project Manager should seek additional information from the survivor.

GBV incident reporting is not subject to survivors' consent but the PIU Safeguards Specialist needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to PIU and WB; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved, or disciplinary action taken.

As long as the SEA/SH remains open the PIU Safeguards Specialist and/or Project Manager should update the World Bank TTL on the measures taken to close the incident.

ACTION 3: Grievance verification and investigation

Each SEA/SH incident should be verified to determine if it was related to the WB financed project. The PIU safeguards specialist should form a SEA/SH verification committee comprised by her/him, one member of the DoHW, one member of a local service provider and a representative of the contractor (if relevant). The PIU Safeguards Specialist should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project (**Annex 7: SEA/SH Complaint Verification Form**).

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project³, the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labor legislation, the employment

³ Project actors are: (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in St Lucia legal system, the PIU Safeguards Specialist should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU Safeguards Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

Annex 1: Listing of available services and points of service on GBV, including contact information

Name of Organization	GBV Service provided	Contact
Government Organizations		
Department of Gender Relations	Hotline; counselling, legal services, skills training, job placement, alternative housing Public education campaigns, referral services	Ground Floor, Georgian Court Building, John Compton Highway, Castries, St. Lucia. +1 758-716-3123 ·
Women’s Support Centre	Residential shelter for women and children (up to 5 families); legal services, counselling	Contact via DGR
Family Court	Cases management, counselling for survivors and perpetrators, Protection Orders, Occupation Orders, Tenancy Orders	City Courthouse, Castries Tel: 758-453-2839
Vulnerable Person Team/Unit	Emergency response, investigation, arrest, and provision of evidence for prosecution. Public education campaigns, referrals	Tel: 758-456-3980 (Southern Division) 758-456-4050 (Northern division).
Civil Society		
St. Lucia Crisis Centre	Emergency shelter facilities, hotline, counselling, public education, referrals	Ms. Rufina Paul/ Ms. Paul-Akuffo 107 Chausee Rd. Castries, St. Lucia. Tel: 758-453-6848
National Organisation of Women	Public education campaigns, referrals.	Ms. Virginia Albert Tel: 758-450-5247
United and Strong	Public education around GBV and the LGBTQI community; referrals	Adaryl Williams Tel; 758-450-0976
Raise Your Voice St. Lucia	Training on GBV prevention and response using human rights based and survivor centered approaches.	Manoel Street Castries Tel: 758-723-4227

Annex 2: Complaints Form Template

Complaint Number: [Number]

CONFIDENTIAL Complaints Form
DO NOT FILL IN IF SEA/SH SURVIVOR DOES
NOT CONSENT
OECS Regional Health Project and Saint
Lucia Health System Strengthening Project

Please complete this form to report a problem or file a complaint with the OECS Regional Health Project and Saint Lucia Health System Strengthening Project. After you fill the form, tear off and keep the receipt at the bottom and put the form in the complaints box.

Program

1. What program are you complaining about? Please tick the correct box.

OECS Regional Health Project (explain project activities briefly)

Saint Lucia Health System Strengthening Project (explain project activities briefly)

Other

Details of Complaint

2. Today's date: Day _____ Month _____ Year _____

3. Parish: _____

4. Sex of person complaining (M/F): _____ 5. Age of person complaining: _____

Please tell us about your complaint so the program can investigate. Please include as much information as possible.

Personal Details (Optional) PLEASE NOTE THAT YOU HAVE THE RIGHT TO REMAIN ANONYMOUS AND NOT PROVIDE PERSONAL DETAILS.

If you would like to receive a response from the program about your complaint, please fill in your details below. If you do not fill in these details, you will remain unknown and the program will not be able to contact you.

6. First Name: _____ 7. Last Name: _____

DO NOT FILL IN IN THE CASE OF SEA/SH GRIEVANCES

8. Parish: _____ 9. Mobile number: _____

10. Mediator for affected person: _____

11. Civil organization / Service Organization: _____



Receipt:
Date received: _____

Complaint Number: [Same number as above]

Person receiving the complaint: _____

Annex 3: Grievance Registers

DO NOT FILL IN IN THE CASE OF SEA/SH GRIEVANCES

Page Number: **[Number]**

OECS Regional Health Project Saint Lucia Health System Strengthening Project										
IDENTIFICATION OF PERSON / ENTITY				NATURE OF THE REQUEST / COMPLAINT			REQUEST/ COMPLAINT PROCESSING			
Log #	Name (and age) of the complainant	Contact Details	Incident date	Information request / complaint	Received by	Response provided / action taken	Date of request / incident response	Action Taken (under review, investigation, closed)	Date Closed	

FILL IN ONLY FOR SEA/SH INCIDENTS

OECS Regional Health Project Saint Lucia Health System Strengthening Project			
Nature of the allegation(what the complainant says in her/his own words without direct questioning)	Was the alleged perpetrator was/is, to the survivor's best knowledge, associated with the project (yes/no)	Survivor's age and/or sex (if disclosed)	Was the survivor referred to services?

Annex 4: Meeting Record Format

Subproject: Community: Location:

Date of the Meeting: Complaint Register No:

Venue of meeting:

Details of Participants:

Complainant	Project/Government

Summary of Grievance:

Notes on Discussion:

Decisions taken / Recommendations:

Issue Solved / Unsolved _____

Signature of Chairperson of the meeting:

Name of Chairperson: Signature :.....

Date: (DD/MM/YYYY)

Annex 5: Grievance Closure Form

Subproject: Community:..... Location:

Result of Grievance Redressal

1. Registration No.:
2. Name of Complainant:
3. Date of Complaint:
4. Summary of the Complaint:
5. Summary of Resolution:
6. Date of Redressal of the Grievance: (dd– mm – yyyy)

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

Name:.....

National ID number:

Signature of Permanent Secretary or Project Manager:

Name:

Place:

Date:(dd –mm – yyyy):

Annex 6: Consent Form for SEA/SH Survivors

This form should be read to the survivor or complainant in their first language.

CONFIDENTIAL

Consent for Release of Information

It should be clearly explained to the client that she / he can choose any or none of the options listed.

I, _____, give my permission for (**Name of Organization**) to share information about the incident I have reported to them as explained below:

1. I understand that in giving my authorization below, I am giving (**Name of Organization**) permission to share this specific case information from my incident report with the service provider(s) I have indicated, so that I can lodge a complaint.

I understand that shared information will be treated with confidentiality and respect and shared only with those involved in the management of the complaint and response.

I understand that releasing this information means that a person from the OECS Regional Health Project and Saint Lucia Health System Strengthening Project or another service provider (**give an example of other services available in the community**) may come to talk to me. At any point, I have the right to change my mind about sharing information with GEWEL or other service providers.

I understand that I can change my mind and request that my information is not shared at any time in the process and my wishes will be respected.

1. Authorization to be marked by complainant: (or parent/guardian if complainant is under 18)	Yes	No
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2. I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

2. Authorization to be marked by complainant: (or parent/guardian if complainant is under 18)	Yes	No
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Signature/Thumbprint of complainant

Date: _____

Complainant's name: _____

Contact Number: _____

Address: _____

Annex 7: SEA/SH Complaint Verification Form

TO BE FILLED BY THE PIU SAFEGUARDS SPECIALIST

Introduction:

This form should guide the verification process by the SEA/SH verification committee. The verification structure will be in the form of a committee, with at least three members, which will be convened in an ad hoc manner depending on the nature of the incident. If permitted by the survivor, a representative from a service provider should participate in the verification committee in order to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process.

SEA/SH Definition:

Sexual Exploitation

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Harassment

Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

The verification committee is tasked to review available information about the SEAH claim in question, the nature of the claim, and whether there is a link with the project. The committee will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability in recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility. In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator.

Section A:

Has the survivor provided his/her informed consent either verbally or in written form to proceed with an investigation?

Yes No

IF YES, please complete the form in its entirety.

IF NO, please seek the consent of the survivor only to anonymously share 1) the complaint number, 2) the type of incident reported and the date and area of the incident, 3) the alleged perpetrator's connection to the project (if known), and 4) the age and gender of the survivor.

Section B:

1. INFORMATION RELATED TO THE GRIEVANCE RAISER/GBV SURVIVOR

Survivor Code:

Age and sex of the GBV survivor:

Girl (<18)

Woman (>=18)

Man (>=18)

Boy (<18)

Other

Unanswered

2. INFORMATION RELATED TO THE SEAH ALLEGATION:

Time, area and date of incident reported by the survivor:

Rape

Sexual aggression

If relevant, please specify:

Sexual exploitation and abuse

Sexual harassment

Has the survivor received any services? Yes No

If yes, please specify:

Medical

Psychosocial

Legal

Security/protection:

Other please specify:

3. INFORMATION REGARDING THE LINK TO THE PROJECT:

Is the alleged perpetrator linked to the project?

Ye

Non

Do not know

Name of the alleged perpetrator (if known):

Role of the alleged perpetrator (if known):

- PIU staff
Contractor worker
Any other individual associated with the project
Not known

Has the incident been confirmed as credible after verification?

Yes No Verification ongoing

End date of the verification process:

Decision taken:

- No action/sanction
Informal warning
Formal warning
Additional training
Loss of salary
Suspension of employment
Layoff with notice
Layoff without notice
Report to the police if warranted
Other actions

Please specify:

Date of notification to the perpetrator's employer/contractor:

Date of notification to the GBV survivor:

Notification of the implementation of the decisions/sanctions: Yes No

Notification to the PIU Yes No

Notification to the World bank

Yes No

Note below any follow-up communication with the survivor: *For example: When/if a verification has begun, or the allegation has been determined to have an insufficient basis to continue. It may also include concerns raised by the victim through the verification process.*