



Government of Kiribati

Ministry of Infrastructure and Sustainable Energy

## South Tarawa Water Supply Project

### Grievance Redress Mechanism



Final  
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Prepared by STWSP Project Management Unit, MISE

With Assistance From:

**FCG** ●



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## Contents

Contents .....	3
Abbreviations .....	4
Definitions .....	5
I. Rongorongona ae Kimototo .....	6
II. Executive Summary .....	7
III. Introduction .....	9
IV. What is a Grievance Redress Mechanism? .....	10
V. When Do Project Stakeholders Use the GRM? .....	10
VI. Objectives of the GRM .....	10
VII. Scope of the GRM .....	10
Scope .....	10
Limitations .....	11
Who may lodge a grievance? .....	11
VIII. GRM principles .....	12
IX. GRM process .....	17
X. GRM database .....	20
XI. GRM risk classification .....	21
XII. GRM actors and governance .....	22
GRM Officer .....	22
GRC .....	22
XIII. Final recommendations from national and international lessons learned .....	23
XIV. Appendices .....	24
Appendix 1: GRC Meeting minutes' template .....	24
Appendix 2: GRM flow diagram for the inclusion of a Grievance Redress Committee .....	25
Appendix 3: STWSP Grievance Redress Registering and Monitoring Form .....	26

## **Abbreviations**

ADB	Asian Development Bank
ADR	Alternative Dispute Resolution
CSO	Civil Society Organisations
GRC	Grievance redress committee
GRM	Grievance redress mechanism
GRN	Grievance registration number
MISE	Ministry of Infrastructure and Sustainable Energy
NGO	Non-government Organisations
PDA	Project Design Advance
PMU	Project Management Unit
STWSP	South Tarawa Water Supply Project
WB	World Bank

## Definitions

**Dispute** – means a disagreement or argument between two or more people.

**External GRMs** – refers to any court, tribunal, committee or body with the mandate to resolve grievances or disputes that arise from breaches to sector legislation or other laws in Kiribati.

**External Entities** – refers to any organisation or entity that is not included within the project of the Ministry of Infrastructure and Sustainable Energy (MISE). These normally cover the mainline government institutions, judiciary, legal agencies and law enforcement agencies.

**Grievance** – means any complaint or concern whether actual or potential, which arises as a result of an unfair treatment or practice<sup>1</sup>.

**Grievance Redress Mechanism (GRM)** – means an organizational system and resources established by a specific project to receive and address concerns about the impact of their activities and operations on external stakeholders.

**Mediation** – means the process a mediator uses to help the parties in a dispute to identify their disputed issues, develop and evaluate options, and enable them to make their own decisions about how to forward and or enhance their communication in a way that addresses their mutual needs with respect to their individual interests with future actions and outcomes and enable them to reach their own agreement or make a decision based on the principle of self-determination and includes blended processes and customary forms of mediation.

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<sup>1</sup> Taken from the Oxford English Dictionary - <https://en.oxforddictionaries.com/definition/grievance>

## I. Rongorongona ae Kimototo

Grievance Redress Mechanism (GRM) e na kona n buokia communities, taan mwakuri ao bon te botannaomata n uotirake aki raun nanoia ke aia tangitang ao man karekei buokaia n taai ake a rotaki iai n ana mwakuri te Karikirake.

**Tera te GRM?** Te GRM bon te kawai are e kateaki man barongaki bwa ena butimwaai tangitang ake aki kona n taobaraki rinanon te maroro ma te tia tang, ma a kainanoi mwakuriaia ke rinanoakia. Te GRM bon ngaia te kawai ae kabongana te South Tarawa Water Supply Project (STWSP) n tobwai kanganga, kauntaba ao tangitang ake a na riki inanon waakinan te karikirake.

**Ningai ae I kona n kabongana te GRM?** Ngkana e kona n taobaraki am tangitang ke n kaekaki am titiraki rinanon te maroro, ao e bon aki kainanoaki bwa ko na kabongana te GRM. E kabonganaki te GRM ngkana te tia tang eaki nanoraai imwin te maroro ao n tangiria n kan uotarake ana tang. Te STWSP GRM e na bon ti butimwaai ao n mwakurii tangitang ake a irekereke ma te karikiriake aio. E bon aki naba ekinakoa oin tabeia ana rabwata nako te Tautaeka n aron te Botaki n Bureitiman ke te Kabowi. N taai are e aki kona n kaekaaki te tang rinanon te STWSP GRM ke akea ana kona te GRM n taobara te tang ao te Karikirake e na uotarake te tang nakoia ana rabwata te tautaeka ake a irekereke ma te tang ibukin karekean buokam.

**Antai ae kona n kabongana te GRM?** Aomata ni kabane ake a rotaki n ana mwakuri te STWSP. N aroia naake a maeka n uakaan ma ana tabo n Kateitei te STWSP ao bon te botannaomata ni kabane.

**Tera tuua ibukin te GRM?** Babaire ma kawai inanon te STWSP GRM a bon aanaki iaan te motiraai, te aki kakaokoroaki, e kirati ke n itiaki taian babaire ao e kateimatoa te reitaki ae tamaroa imarenan te tia tang ao te Karikirake.

**Tera kawai n reitaki iaon te GRM?** Ko kona n reitaki ma ana aobitia te Karikirake ibukin te GRM rinanon te tareboon ao te email ke n bon kawara Aobitin te STWSP i Betio.

**Tareboon:** 730-33111

**Email:** GRM.STWSP@mise.gov.ki

**Tera ae na riki imwin nikirakin au tangitang?** Te Aobitia ibukin te GRM e na riai n okiriko n aki iremwe imwain 2 te bong imwin nikiran am tangitang. E na kaotia nakoim ae reke iron te Karikirake am tangitang ao n anganiko naba nambwana. E na kona naba n tuangko baika a kainanoaki riki ngkana iai, ibukin rinanoan am tangitang. Imwin aio ao e a tauraai n rinanoaki, mwakuriaki ao n kaekaaki am tangitang.

**Tera ae na riki ngkana I aki nanoraai n te babaire man te GRM?** E na kona te STWSP n anai riki rongorongona mairoum ngkana iai, n te aro bwa e na manga rinanoaki am tangitang. Ngkana ko teimatoa n aki nanoraai ao e na kona n uotakirakeaki te tang nakoia rabwata ake iaona, ke itinanikun te karikirake ibukin buokam.

**Tera ae na riki n tokin te GRM?** Ngkana e nanoraai te tia tang ao a bane n taobaraki kanganga ke bubuti ao e na bon kainaki te tang. Ni kabane rongorongon te tangitang ma mwakuriakina a na bon koreaki ao n kawakinaki n taian riboti bukin manga kainanoakia rimwi ngkana e riai.

## **cKawain te STWSP**

## **II. Executive Summary**

A grievance redress mechanism (GRM) enables local communities, employees, and other affected stakeholders to raise grievances with the project team and seek redress when they perceive a negative impact arising from the project's activities.

**What is the GRM?** The GRM is a formal mechanism created to provide a facilitated approach towards resolving grievances that fail to be addressed through dialogue and consultation between Project and those raising the grievances. The GRM address contentious issues, complaints or disputes that arise during the period implementation of the South Tarawa Water Supply Project (STWSP).

**When to use the GRM?** When a grievance can be resolved verbally and amicably on site it is not required to be put through the GRM process. However, if any of the parties is not satisfied with the outcomes, the GRM is there for them to elevate the concern. The GRM can only deal with STWSP related issues to the extent it does not interfere with the responsibilities or mandates of the Government or any other public organisation like the Police or the court system. Where a particular grievance is identified, and brought to the attention of the GRM and where the GRM does not have the jurisdiction to manage it, they are required to automatically refer these grievances to the appropriate external entity to handle.

**Who can lodge a grievance?** Anyone directly impacted by the STWSP or those living in areas adjacent to infrastructure or activities related to the STWSP.

What are the principles of the GRM? The GRM is aligned with the principles of fairness, transparency, legitimacy, memory, continuous learning, engagement and dialogue.

**How to lodge a grievance?** There are different ways, you can either speak to the GRM Officer on 730-33111, send an email to GRM.STWSP@mise.gov.ki. or fill a GRM form at the STWSP project office located at Betio.

**What happens after I lodge a grievance?** The GRM officer will contact you within 2 business days to acknowledge your grievance and if necessary, collect more information. The grievance is then assessed and investigated, and a resolution or response provided to you.

**What if I don't agree with the outcome?** The grievance is only closed once a resolution has been agreed and all related response actions have been completed. If you are not satisfied

with the outcome, further information may be collected to reassess the grievance. The grievance is then reconsidered and a response on the outcome provided to you. If you still don't agree with the outcome, the grievance is referred/escalated to the relevant external authority.

**How does the process ends?** Once your issue or concern is satisfactorily addressed, the grievance is closed and all the information is recorded for future reference.



### **III. Introduction**

As part of STWSP compliance with donor safeguard requirements and relevant national legislation a grievance redress mechanism (GRM) has been designed to assist the South Tarawa Water Supply Project (STWSP) with the implementation of its safeguard requirements. The implementation of social safeguards following Asian Development Bank (ADB) and World Bank (WB) policies calls for the implementation of best practice, one of them being the need for an internal feedback and grievance redress mechanism to be effectively available.

Grievance redress mechanisms have been operated with varying degrees of success. This document provides guidance in the implementation of a GRM specifically designed for the STWSP. Experience from projects in Kiribati other Pacific Island Countries has demonstrated that seemingly minor complaints can quickly become major grievances if left unattended and unmanaged. In other words, addressing grievances early has been found to be ideal. A GRM is an important tool that enables the Project team and MISE officers to learn about and resolve concerns before they escalate. GRMs promote and allow peaceful and timely resolution of problems, assuring communities and stakeholders that their concerns have been heard and that the Mechanism will produce a fair and impartial outcome.

The Project Team should always remember that no reported grievances do not mean that no grievances exist. In some cases, project teams thought there were no grievances as none had been received, although they maintained that their door was always open. However minor grievances were not lodged until they escalated and became major grievances. In many cases because community members were ignorant of how to raise them, often relying on the traditional systems and trusting that local leaders would raise them on their behalf. A more successful approach encourages the design of the GRM to take place in consultation with communities. While such approach is not taken in many projects and funding models may prevent for this to happen, early socialisation of the GRM will provide better outcomes for both projects and communities and stakeholders.

It is recommended for the GRM to be positioned within the Project Management Unit (PMU) as the organisation mandated with the power to coordinate all project related activities, structures and systems.

Specifically, these documents outline a) the steps required from intake to referral and who is in responsible and b) the actors involved.

#### **IV. What is a Grievance Redress Mechanism?**

A grievance redress mechanism (GRM) is a set of arrangements that enable local communities, employees, and other affected stakeholders to raise grievances with the project team and seek redress when they perceive a negative impact arising from the project's activities<sup>2</sup>. GRM is a key way to mitigate, manage, and resolve potential or realized negative impacts, as well as fulfil obligations under international human rights law and contribute to positive relations with communities and projects.

#### **V. When Do Project Stakeholders Use the GRM?**

The GRM is a formal mechanism created to provide a facilitative approach towards resolving grievances that fail to be addressed as part of stakeholder dialogue and consultation between Project and stakeholders. It is the intermediary step between the informal and the formal measures of grievances redress available within the country, such as the courts and should only be used after initial stakeholder dialogue has been exhausted.

An important feature of Kiribati culture is resolving grievances verbally in open discussion between people and their leaders. Where a grievance can be resolved verbally and amicably on site it is not required to be put through the GRM process. However, if any of the parties is not satisfied with the outcomes, the GRM is there for them to elevate the concern.

#### **VI. Objectives of the GRM**

A key objective of the GRM is to strengthen safeguards implementation in the STWSP. It is anticipated that project and program implementation may dynamically impact the types of conflicts created in relation to the use of land and natural resources. It is therefore, imperative that an effective GRM is in place to address contentious issues, complaints or disputes that arise during the period of its implementation, as part of a necessary project/program safeguards systems. It will ensure social and environmental risks arising from project/program implementation are addressed efficiently, effectively and equitably.

#### **VII. Scope of the GRM**

##### **Scope**

The following illustrates that the specific scope of the GRM does not extend into or interfere with any of the mandates (jurisdiction), roles or responsibilities of external entities, unless such entities are part of the GRM process. In the same way it also cannot, by virtue of its existence, obstruct or appear to obstruct, the full function and operation of any government agencies. Where a particular grievance is identified, and brought to the attention of the GRM

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<sup>2</sup> Definition adapted from World Bank, United Nations Conference on Trade and Development.  
Finnish Consulting Group Asia Pte Ltd

and where the GRM does not have the jurisdiction to manage it, they are required to automatically refer these grievances to the appropriate external entity to handle. Examples of the types of grievances the GRM can or cannot handle are provided below.

## Limitations

The GRM:

- Cannot deal with grievances that arise from issues that are political in nature.
- Cannot deal with grievances that relate to MISE or other Governmental administrative/regulatory functions.
- Cannot resolve national, provincial or district level policy issues. It can only assist in facilitating the dialogue required to help reach a solution.
- Is a facilitative measure and not an adjudicating body.
- Provides a channel through which grievances are directed to the Project Team for redress when appropriate at the Project level but not necessarily to resolve all grievances.
- Cannot resolve grievances that are outside the scope of the project (i.e., do not arise from the implementation of the project/program).

## Who may lodge a grievance?

As described above, one of the key principles of the GRM is accessibility. The GRM is to be designed to be accessible, firstly, by those who are directly impacted by activities as a result of the implementation of the project. However, this will also need to be further extended to include local communities and customary groups that may not necessarily be directly affected but are living within the areas adjacent to the project sites.

There may also be other stakeholders to also raise a grievance, but only if they are directly impacted by the project or represent those directly impacted by the project, they may include but are not limited to:

- Customary landowners
- Landowners
- Local communities in the project area
- Island/Urban Councils
- Civil Society Organisations (CSOs)/Non-government Organisations (NGOs)
- Private sector/Industry representatives.
- Individuals and families in the project area

## VIII. GRM principles

The principles outlined in this GRM are based on international best practice and key performance criteria to set benchmarks for its design as well as to guide the process of determining how should be administered.

A demonstration of the application of these above-mentioned principles (and key performance criteria and indicators) within the GRM is illustrated in the Table 1 and details how the current framework respects and incorporates these principles into its grievance redress process. Table 1 has been developed using several sources from GRM projects and programs across the Pacific Region.

**Table 1.** GRM Principles and Key Performance Criteria and its application to the GRM in the STWSP

Key Principle	Guiding Questions	Application within project GRM
<p><b>Accessibility</b></p>	<ul style="list-style-type: none"> <li>▪ Is the GRM accessible to all stakeholders, irrespective of their remoteness, language, education or income level?</li> <li>▪ Are procedures to file grievances and to seek action easily understood by project/program beneficiaries?</li> <li>▪ Can grievances be filed anonymously?</li> </ul>	<p><b>Accessibility and availability.</b> Information about the existence and functioning of the GRM needs to be made readily available to all stakeholders. This is achieved as part of the overall community engagement strategy (reflected in the Stakeholder Engagement and Management Plan*) and may include community announcements such as through posters or on local radio and other relevant media channels.</p> <p>MISE and the STWSP team need to ensure that procedures are clear and understandable to the entire range of stakeholders.</p> <p>Other guiding questions may include:</p> <ul style="list-style-type: none"> <li>▪ Are there a range of contact options?</li> <li>▪ Is the GRM appropriately advertised and communicated to project-affected people?</li> <li>▪ Are simplified and easy to understand version available in Kiribati language?</li> </ul> <p>*SEMP was developed at the beginning of the PDA and approved with PDA' Inception Report.</p>
<p><b>Predictability</b></p>	<ul style="list-style-type: none"> <li>▪ Is the GRM responsive to the needs of all complainants?</li> <li>▪ Does the GRM offer a clear procedure with time frames for</li> </ul>	<p><b>Clearly structured process from complaint to resolution.</b> The GRM establishes a clear, sequential process to follow that stipulates steps to take and allocates responsibilities at each stage. The process indicates who is responsible for following up and resolving the grievance—and those functions should be a part of employees' performance indicators.</p>

Key Principle	Guiding Questions	Application within project GRM
	<p>each stage and clarity on the types of results it can (and cannot) deliver?</p>	<p>This process is communicated to aggrieved parties to manage expectations about the process. It includes deadlines for actions of both the PMU (and its contractors) and the aggrieved party.</p> <p><b>Clear resolution procedures.</b> It is critical that all parties have clarity about when a resolution to a grievance has been agreed. Clarity is aided by signed resolution agreements with clear follow-up actions.</p>
<p><b>Fairness</b></p>	<ul style="list-style-type: none"> <li>▪ Are grievances treated confidentially, assessed impartially, and handled transparently?</li> </ul>	<p><b>Provisions for confidentiality and anonymity.</b> The GRM provides aggrieved parties with the option to keep complaints confidential and/or anonymous. Illiterate people raising a grievance will need assistance so it can be transcribed through a trusted confidant. This could be a family member, friend, or a designated official.</p> <p><b>Provision for appeal.</b> The process is clearly stipulated for aggrieved parties to appeal decisions if they are dissatisfied with the outcome (refer to Step 7b in Figure 1).</p> <p><b>Broad representation.</b> The Grievance Redress Committee (GRC) allows for broad representation on any consultative body, including youth, women, and marginalized and vulnerable groups.</p>
<p><b>Rights compatibility</b></p>	<ul style="list-style-type: none"> <li>▪ Are the GRM’s outcomes consistent with applicable national and international standards?</li> <li>▪ Does it restrict access to other (external) redress mechanisms?</li> </ul>	<p><b>No substitute for judicial or administrative mediation procedures.</b> GRM does not substitute for—and does not obstruct—judicial and administrative remedies, such as mediation or arbitration, which are necessary for disputes beyond the scope of GRM.</p> <p>A key function of a GRM is to address emerging concerns before they reach a level that may warrant judicial or administrative proceedings.</p> <p><b>Information on judicial or administrative mediation procedures.</b> If the aggrieved party remains dissatisfied or the complaint is beyond the scope of the GRM, the Project / GRM Officer provides information on external dispute resolution mechanisms/local judicial system.</p>

Key Principle	Guiding Questions	Application within project GRM
<b>Transparency and Legitimacy</b>	<ul style="list-style-type: none"> <li>▪ Are the GRM’s procedures and outcomes transparent enough to meet the public interest concerns at stake?</li> <li>▪ Does the GRM operate independently of interested parties?</li> <li>▪ Is the GRM widely-perceived as independent?</li> </ul>	<p><b>Transparency.</b> The process and outcome of individual grievances is transparent to the claimant. In disclosing more widely the outcome of grievances, a balance needs to be struck between accountability and transparency, and the desires of aggrieved parties to keep complaints confidential. The Project will present aggregated public reporting of the operation of the grievance procedures, such as quarterly reports on the number of grievances, their nature, and statistics on how they have been resolved. In cases where the publication of specific grievances or outcomes may be in the interests of the community or community relations, permission will be first sought from the aggrieved individual.</p> <p><b>External monitoring.</b> To help maintain accountability and trust in the process, the GRM and GRC can be monitored by local government or trusted third parties.</p> <p><b>Multi-channelled.</b> To avoid conflicts of interest, there are multiple ways for a grievance to be raised.</p>
<b>Capability</b>	<ul style="list-style-type: none"> <li>▪ Do GRM officers have the necessary technical, human and financial resources, means and powers to investigate grievances?</li> </ul>	<p><b>Resilience to financial and operational difficulties.</b> The GRM can be especially important if Projects begin to experience financial difficulties and struggle to deliver on commitments and expectations, such as jobs or community development programs. This is also the time when investors will be tempted to cut back on GRM and other community relations activities but doing so risks exacerbating financial or operational problems by creating a disgruntled local community.</p>
<b>Memory</b>	<ul style="list-style-type: none"> <li>▪ Do the project have in place a GRM Database and other record keeping facilities and processes established</li> </ul>	<p><b>Documentation.</b> The GRM has a suitable system for ensuring the maintenance of written documentation of all relevant stages in the process. The system includes a STWSP Grievance Redress Registering and Monitoring Form (example on Appendix 3), minutes of any meetings held by the GRC</p>

Key Principle	Guiding Questions	Application within project GRM
	<p>before commencing operations?</p>	<p>(Appendix 1), and signed agreement to any resolution to a grievance.</p> <p>Good-quality documentation minimizes the risks of grievances being raised again and of subsequent complaints about the resolution. Tracking of the physical location of the source of the grievance (possibly using What-Three Words (W3W) coordinates system available as a mobile App) is important so that grievance patterns can be analysed spatially, to help identify particular problems and solutions.</p>
<p><b>Enabling continuous learning</b></p>	<ul style="list-style-type: none"> <li>▪ Are relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms in place?</li> </ul>	<p><b>Internal evaluation.</b> The GRM should be evaluated against key performance indicators such as the percentage of grievances resolved internally before they reach courts; targets for closure of grievances within a specified time frame; target of closure within the first two internal rounds of discussions, avoiding the need for external mediatory bodies; number of complaints expressed as a monthly value for critical, major, and minor grievances; and percentage change year by year of the number and degree of grievances. The successful application of a GRM is an evolutionary process, and the project team should monitor and look for ways to improve the application of the GRM itself.</p>
<p><b>Based on engagement and dialogue</b></p>	<ul style="list-style-type: none"> <li>▪ i.e., consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.</li> </ul>	<p><b>Link to overall community engagement strategy.</b> GRM forms one part of the project’s overall community engagement strategy to ensure ongoing dialogue with stakeholders affected by its operation (see Stakeholder Engagement and Management Plan). The success or failure of GRMs tends to hinge critically on the general relationship between the local management of the project and local communities. Formal, well-established procedures can help develop this relationship as grievances are dealt with in a transparent, fair manner. If community-project relations are poor from the outset—as is often the case when pre-investment consultations are not done well—it is unlikely the GRM will rectify this problem.</p>

<b>Key Principle</b>	<b>Guiding Questions</b>	<b>Application within project GRM</b>
		<p><b>Set fair and consistent standards early on.</b> After its launch, a GRM tends to receive a wave of grievances, complaints, disputes, suggestions, and requests. As the PMU demonstrates fair and strict management of these grievances, employees and community members learn which issues can be raised and the process stabilizes. Projects need to be vigilant in not overcommitting or creating the impression that all issues can be automatically resolved.</p>

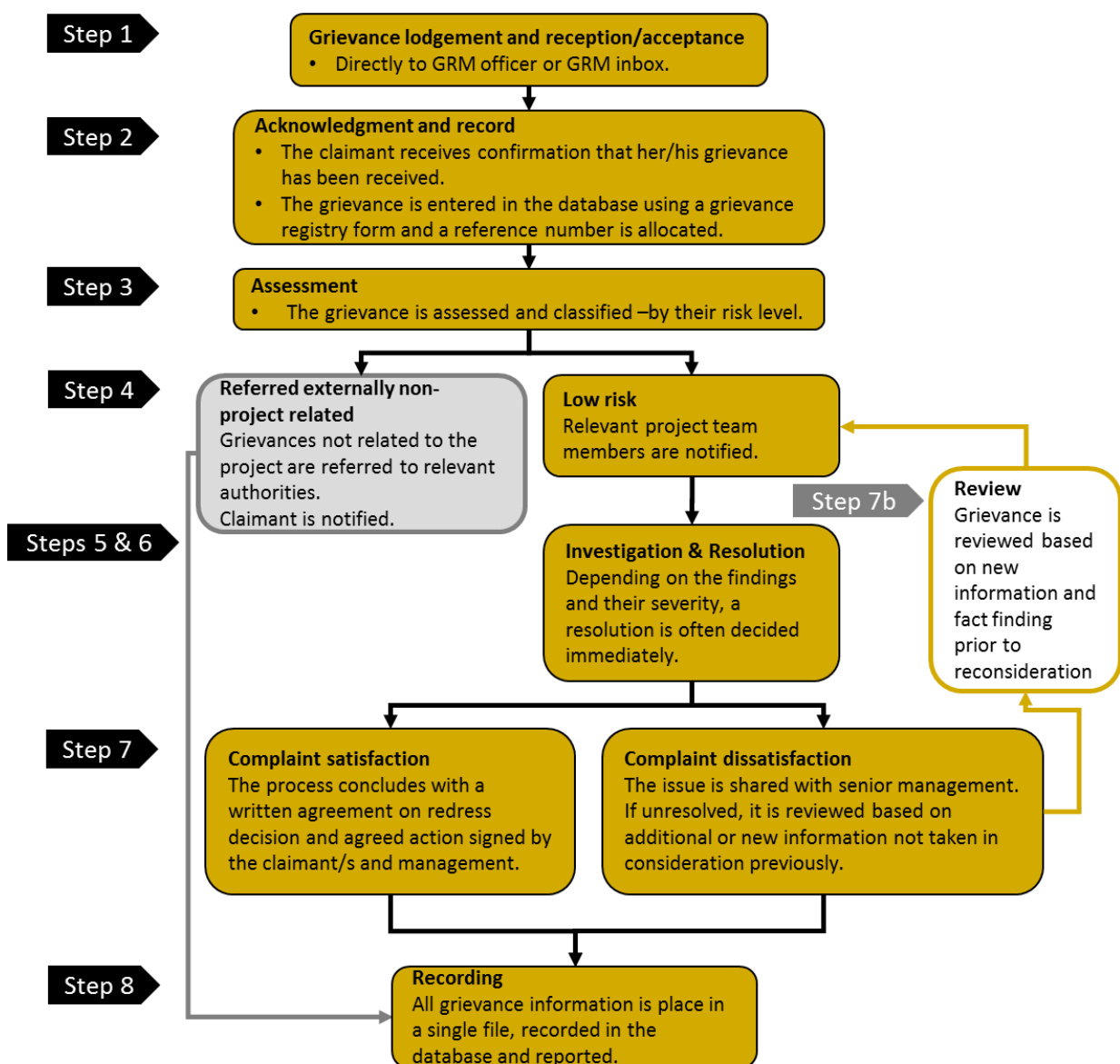


## IX. GRM process

The flow diagram in Figure 1 presents the GRM process for the STWSP. Each of those steps is described below.

Due to the classification of the project and the likely social and environmental impacts, a Grievance Redress Committee (GRC) is not deemed required. The occurrence of grievances with significant impacts to those affected may merit the formation of a GRC. An alternative flowchart diagram for the inclusion of the GRC is presented in Appendix 2.

**Figure 1. GRM flow diagram for the STWSP’s Implementation Phase**



## **Step 1** Grievance lodgement and reception/acceptance

Grievances are lodged using any of the following channels:

- in person to the GRM Officer at STWSP office Betio, Public Relations Officers at MISE Headquarter office Betio and MELAD-ECD office Bikenibeu.
- in person at any STWSP Construction site (Contractor)
- by phone calling +686 730-33111;
- in writing using the STWSP Grievance Redress Registering and Monitoring Form (refer to Appendix 3) and deposited in the **GRM inbox** located in the STWSP office; or
- by email directly to GRM.STWSP@mise.gov.ki

When grievances are lodged with the GRM officer at STWSP Office or with responsible officers at MISE headquarter office, MELAD-ECD office or at the Construction Site, regardless of the level of risk or nature of the grievance, the officer will complete a Grievance Redress Registering and Monitoring Form with the complainant. STWSP Grievance Redress Registering and Monitoring Form is provided in Appendix 3.

MISE, MELAD-ECD and the Contractor must forward the completed form to the STWSP Office no later than 1 day after receiving the grievance. In case of any person who wishes to file an anonymous complaint, he/she shall be allowed to do so by not filling Section A (1-7) of the Grievance Redress Registering and Monitoring Form.

The GRM inbox should be located at the Project Office, the GRM Officer is responsible for regularly retrieving submissions from the inbox. The GRM Inbox will be opened at least twice every week.

A key responsibility of the STWSP GRM Officer is to support claimants in lodging their grievances. This may include completing the Grievance Redress Registering and Monitoring Form with illiterate complainants. All forms should be signed by the complainant/s and complemented with relevant photographs.

## **Step 2** Acknowledgment and record

Once the grievances are lodged and recorded in the GRM database (refer to section 8) and grievance registration number (GRN) is allocated, the complainant receives formal acknowledgment of the grievance been lodged. Acknowledgment should be provided to the claimant within 2 business days of lodgement by the STWSP GRM Officer. The acknowledgment letter should include:

- the GRN
- particulars of the grievance (person who lodge it, address, date and type of grievance)
- brief explanation of the GRM process, a simplified version of Figure 1 would help the complainant to understand the process and the GRM to manage expectations
- statement on confidentiality and management of private information

- expected timeframes
- contact details of the GRM Officer and
- instructions on how to update or withdraw the grievance.

Allowing claimants to update or withdraw lodged grievances may avoid the lodgement of additional grievances or having to reassess grievances once a response has been provided to the claimant.

Depending on the preference of the complainant, the acknowledgement letter must also be available in the Kiribati language.

### **Steps 3 and 4 Assessment and risk identification**

Upon receipt, the GRM Officer reviews and determines if the complaint meets the eligibility criteria.

Grievances are assessed based on the information provided by the claimant and readily available information. The assessment should follow a risk management approach where the assessment identifies the risk and implications to the claimant and the project. Details on the risk assessment are provided in Section 9. Potential outcomes of the assessment include:

- **grievance is not related to the Project**, it is then referred to the relevant authority and the complainant is formally notified (refer to process in grey colour in Figure 1);
- **grievance is of low risk**, relevant project team members are notified so they can either a) address the issues been identified through the grievance and promptly provide a resolution or redress (Step 5) or b) provide further information and/or assist in the collection of data and information for the investigation (Step 6); or
- **Grievance is of medium to high risk**, follow flow diagram in Appendix 2 for grievances that require engagement of the GRC.

### **Step 5 Investigation**

During the assessment appropriate investigation required is identified. The purpose of Step 5 is to provide the GRM Officer or GRC (as necessary) with relevant information to understand the grievance, its impacts and any other necessary information that can be used to consider the case and provide relevant redress.

The investigation may require additional information sourced from other agencies such as Government departments or provincial or local administrations or authorities or directly from the complainant. In the latter case, the GRM Officer may be required to meet with the complainant to source additional information or better understand the grievance.

All relevant information sourced is added to the grievance and the database is updated to reflect the addition of such additional information.

### **Step 6 Resolution**

Depending on the findings and their severity, a resolution is often decided immediately. In cases where the resolution does not follow predetermined criteria, the case must be presented to GRC for consideration.

The outcome of the resolution is communicated to the PMU for sign off and implementation. As required, the PMU may decide to communicate the outcome of the resolution to the MISE Secretary.

### **Step 7 Redress satisfaction**

The outcome of the resolution is communicated to the complainant. If the complainant accepts the proposal, the project team implements it according to the process and timeframe set out in the resolution/redress proposal. **The complaint is only closed when the actions in the proposed resolution are satisfactorily implemented.**

If the complainant does not accept the proposed redress, before the grievance is reconsidered, additional information is to be collected so the grievance can be reviewed (**Step 7b**). This may come from the complainant or other sources. The GRM Officer is responsible for sourcing such information and as necessary liaise with the complainant to source it.

When the grievance has not been accepted by the complainant following review of the issue (Step 7b in Appendix 2) and the grievance remains unresolved (Step 7c in Appendix 2), the grievance is referred/escalated to the relevant external authority.

### **Step 8 Recording**

All grievance information is placed in a single file and stored for future reference. Similarly, the outcomes are recorded in the database and reported. Both the grievance files and database (refer to Section 8) are to be handed to the Project Management Unit (PMU) of the STWSP.

## **X. GRM database**

The STWSP Community Engagement Team (CET) in collaboration with the PMU Safeguards Manager are responsible for social and environmental safeguards and issues for the STWSP and are the custodians of the STWSP's Grievance Redress Management Database (the STWSP GRM Database).

A well-managed GRM Database avoids issues that have been resolved to resurface again in the same locations in the STWSP but also in future projects. It has been well recognised that claims and grievances that have been previously resolved are lodged again by complainants but poor record management prevents MISE from having to compensate and redress multiple times the same claims.

The STWSP GRM Database includes:

- All STWSP Grievance Redress Registering and Monitoring Forms (Appendix 3);
- All minutes from meetings, including those of the GRC (Appendix 1);
- All additional documentation, including emails, photos, statements, etc produced during the lodgement and investigation of a grievances; and
- STWSP GRM Registry (electronic spreadsheet).

### XI. GRM risk classification

A simple risk management approach where the likelihood and the consequence are considered is the tool to be used when identifying the level of risk and its consequent management.

**Low risk** – the grievance is entirely managed by the GRM officer. It es expected that most of the grievances will fall in this level.

**Medium risk** – the grievance is managed by the GRM officer with support from the PMU Project Manager or if required the GRC is engaged.

**High risk** – the grievance is elevated by the GRM officer to the GRC for assessment and management.

**Not applicable risk** – those grievances not relevant to the STWSP and that are referred externally.

The criteria to clasiffy the risk according to the likelihood and consequence is described in the matrix in Figure 2. The matrix also indicates when the PMU Manager and the GRC are required to be engaged in the resolution and management of the grievance.

**Figure 2. Risk management matrix**

		Consequence					
		People	No injury	Slight injury, no life threatening	Minor injury, no life threatening	Injury requiring medical intervention, no life	Life threatening injury
		Assets	No to negligible damage	Slight damage, no impact to livelihood	Minor damage with minor temporary economic impact	Damage to property with impacts on	Major damage with permanent impacts on livelihood
		Environment	No effect	Slight temporary Effect	Minor temporary effect	Local effect	Major Effect
		Project, GOK, funding agency reputation	No impact	Slight impact	Limited impact	Considerable impact	Major impact
Likelihood	Certain	The consequence has frequently occurred in the STWSP or similar projects	<p><b>Low risk</b> GRM Officer to manage grievance. Follow flow chart on Figure 1.</p>	<p><b>Medium risk</b> Engage PMU Manager and/or GRC as required. Follow flow chart on Figure 1 or Appendix 2 if GRC is engaged.</p>	<p><b>High Risk</b> Engage GRC. Follow flow chart on Appendix 2.</p>	<p><b>High Risk</b> Engage GRC. Follow flow chart on Appendix 2.</p>	<p><b>High Risk</b> Engage GRC. Follow flow chart on Appendix 2.</p>
	Almost certain	Happened several times previously in the STWSP or similar projects					
	Likely	Happened previously in the STWSP or similar projects					
	Possible	Has occurred in similar projects					
	Unlikely	Rarely occurred in similar projects					
					Medium Risk		

## **XII. GRM actors and governance**

### **GRM Officer**

GRM Officers are responsible for the overall running of the GRM system. Their responsibilities include but not limited to:

- Acceptance and recording of grievances (Step 1)
- Assessment and classification of grievances (Step 2)
- Referral to external entities when the grievances are not project related (Step 4)
- Entering information and maintaining the Project GRM database and filing of hard copies (all the relevant information is to be recorded in the database, hard copies are only for backup, proof and record keeping purposes)
- Conducting investigations and fact finding to provide information for decision making and resolution (steps 5 and 7b)
- Resolution of low risk and within prescribed parameters grievances (Step 6)
- Providing information and documentation to the GRC for consideration and decision (Step 6b)
- Secretarial support to the GRC
- Create and maintain links with relevant stakeholders including those in the referral pathway.

### **GRC**

Grievance Redress Committee (GRC) is intended to be the point of referral when the grievance cannot be easily resolved by the GRM Officer with support from the PMU Manager (when required) or is classified as high risk. As mentioned, the GRC normally is the channel to pursue after the GRM Officer and management have been exhausted. However, there may be some cases in which grievances may need to be referred directly to the GRC instead of following the other channels because of its nature and risk level.

Membership of the GRC includes:

- PMU Project Manager / Deputy Project Manager (alternate)
- PMU Safeguards Manager
- Senior Admin Officer MISE
- TUC and BTC Representative
- A relevant independent GoK representative depending on the Grievance (e.g. relevant officer from MWYSA/MEHR/MHMS etc)

### **XIII. Final recommendations from national and international lessons learned**

**Alternative procedures.** When the GRM is unable to resolve a grievance, the Project should ensure that the people affected can access an effective remedy through the court system or other legitimate non-judicial process.

**Raise awareness about how to raise grievances.** Projects also have a responsibility for raising awareness about judicial and administrative procedures that can be followed in the event of perceived violations of rights.

**Monitoring of GRM.** Where appropriate, the ESSB may conduct external monitoring of investors' GRMs. The ESSB can consider requiring periodic reporting of aggregate statistics on grievances.

**Contractually require adherence to international best practice.** The need for a GRM based on international standards such as those of the IFC can be included as a provision in the contract between the contractor and MISE.

## XIV. Appendices

### Appendix 1: GRC Meeting minutes' template

#### STWSP Grievance Redress Mechanism

#### GRC Meeting Minutes

Grievance Reference No.: \_\_\_\_\_

Date: \_\_/\_\_/202\_\_ Time: \_\_:\_\_ am/pm to \_\_:\_\_ am/pm

GRC members at the meeting: \_\_\_\_\_

---

#### Background to the grievance:

*Describe the grievance, including relevant dates and detail of interactions with the with the complainant/s lodging the grievance before it was launched*

#### Considerations:

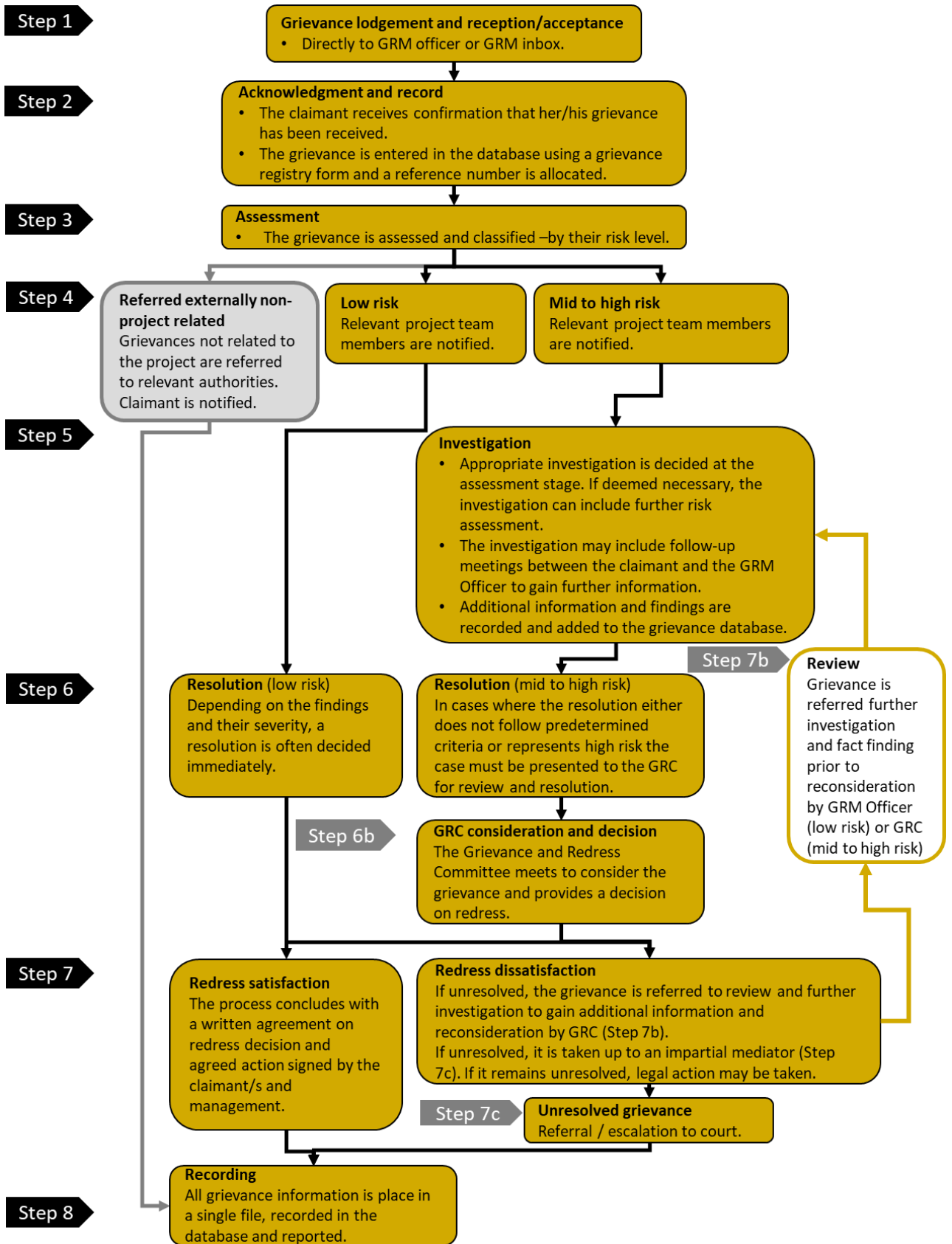
*Describe in dot points the discussion and considerations to assess the grievance, this may include details of how similar or relevant grievances were resolved.*

#### Resolution:

*Describe the decision made in regards to the grievance and the implications for the complainant/s and the Project.*



## Appendix 2: GRM flow diagram for the inclusion of a Grievance Redress Committee



## Appendix 3: STWSP Grievance Redress Registering and Monitoring Form



**MINISTRY OF INFRASTRUCTURE  
AND SUSTAINABLE ENERGY  
SOUTH TARAWA WATER SUPPLY PROJECT**



P.O. Box 498, Bairiki, Tarawa, Kiribati. Phone: (686) 73033111, 751 26192 Email: GRM.STWSP@mise.gov.ki  
Website: www.mise.gov.ki

**STWSP Grievance Redress Registering and Monitoring Form (Booma iibukin Bubuti/Kanganga)**

Grievance Number: (Nambwan te Bubuti/Kanganga)      Date: (Te Bong)      Time: (Te Tai)

**PART A: Complainant Information – Rongorongon te Tia Bubuti/Tang**

- 1 Full Name or Anonymous (Aram/Aki kan kaota Aram) .....
- 2 Address (Am Tabo) .....
- 3 ID Number .....
- 4 Gender       Male (Afwane)       Female (Afiwe)
- 5 Age (Am Ririki) .....
- 6 Telephone (Tareboon) .....
- 7 Email (E-meeri) .....
- 8 Type of Complainant (Kariman iibukin Te Tia Bubuti/Tang)
  - Affected Person (Te tia Rotaki man ana mwakuri te Karikirake)       Government Organization (Tautaaika)
  - Intermediary (Te Tia Tei iibukin Te Tia Rotaki)       Others (Specifi) (Tabua Riki)
  - Civil Organization (Rabwata aika kinaki n aron Community) .....

**PART B: Complaint Details – Rongorongon te Bubuti/te Kanganga**

- 9 Mode of Receiving grievance/problem (Aron niiraikin te bubuti/te kanganga)
  - Letter (Te Reti)       In Person (Ko bon maroro ma taan mwakuri)
  - Telephone (Tareboon)       Suggestion Box (Bwaaki n Kaoti Iango)
  - Email (E-meeri)       Others .....
- 10 Location of problem/grievance (Te Tabo are riki tai te Kanganga)
 

Village (Kaawa): .....      GPS/WP3 coordinates (if any): .....

Community: .....      Others: .....

Land plot Name/Number (Aran/Nambwan te Aba): .....
- 11 Category of Grievance/Problem (Kariman iibukin te Bubuti/te Kanganga)
  - Environment and Social Issues (Rotakin te Otawwanin ao te Botannaomata)
  - Resettlement, Compensations and Land Ownership (Kamwaing, Kabomwi ao Taan Ababa)
  - Employment (Kamwawakuri)
  - Misuse of Project Funds & Corruption (Kabongana buaka mwanen te Karikirake ao Waki ni Kamangao)
  - Violation of Policies (Uruan Tmua/Katitibaire)
  - Suggestions / Others (Iango riki Tabewa)

**12 Brief Description of Problem. Provide factors and agencies causing the problem (Kabwarabwara te Kanganga, Baikara bwai ke rabwata aika a karika te kanganga)**

(Please include information that you consider relevant. If more space is required, continue at the back of this page)

Do you request that all identity be kept confidential? Ko tangiria bwa a na aki kaotaki arata nake ko taotitia?  
 Yes       No

**13 Previous Effort to Resolve the Complaint**

Have you raised the same complaint with STWSP GRM before? Ko a tia n uotarake tangim ael mai mwatna?  
 Yes       No

If Yes, please provide the following (Ngkana ko a tia ao kaoti rongorongon n ae oti i nana)

Assigned Number (Nambwan te Bubuti/Kanganga): .....  
Name of Officer (Aran te Aobitia ae butimwako): .....  
Position (Ana mwakuri): .....  
Office (Te tabo ni mwakuri ae ko nikira tai am Bubuti): .....  
Date (Te Bong): .....

Please describe any response received from any actions taken by the GRM committee level. Please explain why the response or actions taken are not satisfactory. (Tera mwakuri iibukin kaokan am tang are ko moan tabotia ao bukin tera ko aki hukaret tai?).

(Please include information that you consider relevant. If more space is required, continue at the back of this page)

**14 Proposed resolution by the Complainant (Tera ae ko tangiria bwa kaokan am Bubuti/Kanganga?)**

(Please include information that you consider relevant. If more space is required, continue at the back of this page)

**15 Declarations**

Name of Person Completing this Form (Aran Te tia Kanoa te Booma): .....

Signature (Am Tiaina) .....      Date: .....

1

2

**PART C: \*\*\*FOR OFFICE USE ONLY\*\*\***

Grievance No:

**16 Actions taken by receiving office/ministry**

Action 1	Action 2	Action 3	Action 4
Short description	Short description	Short description	Short description
Name of Action Officer	Name of Action Officer	Name of Action Officer	Name of Action Officer
Office	Office	Office	Office
Date	Date	Date	Date

**17 Final Resolution**

(Please include information that you consider relevant. If more space is required, continue at the back of this page)

18 Name of Officer Entering Information into GRM Database	Signature	Date
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3