



Commonwealth of Dominica

Ministry of Agriculture Food and Fisheries

**EMERGENCY AGRICULTURAL LIVELIHOODS
AND
CLIMATE RESILIENCE PROJECT**

**GRIEVANCE REDRESS MECHANISM
(GRM)**

AUGUST 28, 2020

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ACRONYMS

DAIC	Dominica Association of Industry
DEXIA	Dominica Export and Import Agency
EALCRP	Emergency Agricultural Livelihoods and Climate Resilience Project
ESS	Environmental Safeguards Specialist
GC	Grievance Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IST	Implementation Support Team
MoAFF	Ministry of Agriculture and Fisheries
PIU	Project Implementation Unit
POM	Project Operational Manual
SSS	Social Safeguards Specialist

1.0 INTRODUCTION

The purpose of this document is to formalize the management of a grievances redress mechanism (GRM). Grievances resulting from Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP) activities (including environmental and social) will be reviewed and addressed by the Project Implementation Unit (PIU). The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally by the PIU, which aims to reduce conflict and strengthen relationships with stakeholders (internal and external). Table 1 provides definitions of key terms used throughout the grievance process.

Table 1: Grievance Mechanism Definitions

Term	Definition
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the project in a formal manner.
Grievance Mechanism	A formalized way to accept, assess, and resolve individual or community complaints concerning the performance or behaviour of the project, its contracted entities or employees. This includes adverse economic, environmental and social impacts.
Internal Stakeholders	Internal Stakeholders are those directly involved in the work of the project, such as the PIU manager, PIU project team, Implementation Support Team (IST), Beneficiaries (crop and livestock farmers and fisherfolk), Consultants, Contracted Entities, Ministry of Agriculture and Fisheries and the World Bank.
External Stakeholders	Individuals or community groups who are not directly linked to the project's implementation but can influence the activities of the project through various ways. This includes NGOs, the government, political groups, local councils, and the surrounding communities.

2.0 GRIEVANCE REDRESS MECHANISM

2.1 Institutional Arrangements

The Grievance Redress Mechanism (GRM) applies to all external and internal stakeholders of the EALCRP operations during project implementation, including during selection of beneficiaries, restoration of productive base and productive infrastructure and monitoring activities.

All grievances filed should be assessed and classified as Level 1, 2 or 3 by the PIU's Environmental Safeguards Specialist and Social Safeguards Specialist. For levels 1 and 2 grievances filed, there will be a normal response time of 2-10 working days for each case starting from the date the

grievance is officially received by EALCRP PIU. However high-level/level 3 grievance¹ cases may require 10-20 working days for a response.

The Social Safeguards Specialist and Environmental Safeguards Specialist shall meet as required to discuss all grievances filed and resolve the level of the complaint (level 1, level 2, level 3) as **Section 2.5**. This process will be led by the PIU Manager. For grievances classified as level 2 and 3 cases, the Social/Environmental Safeguards Specialist will direct the matter to the PIU Manager with the support of the IST Safeguards Adviser.

The Social Safeguards Specialist and Environmental Safeguards Specialist will submit reports on resolutions applied for level two grievances to the Implementation Support Team’s (IST) Safeguards Adviser for comment and feedback. All grievances classified as level 3 will be reviewed by the Implementation Support Team (IST) Safeguards Adviser, before convening a Grievance Committee meeting. The Grievance Committee as needed to work through the outstanding and difficult grievances and decide jointly on the actions required and communications to the complainant. If, this group is not able to resolve the matter, it should be referred to the World Bank to aid the decision-making process (**Section 2.2**).

The current Grievance Redress Mechanism (GRM) is included in the **EALCRP Project Operational Manual (POM) Section 11.3** with the objective to formalize the management of grievances at the PIU level, to minimize the environmental, health, safety and social risks to the Project and to avoid triggering the World Bank’s Grievance Redress Service (GRS), as outlined in the **POM Section 11.4**.

2.1.1 PIU, Ministry of Agriculture and Fisheries, Department of Forestry and IST Roles and Responsibilities

The roles and responsibilities of the EALCRP Project Implementation Unit, the Ministry of Agriculture and Fisheries and the Implementation Support Team are outlined below and these are linked to the actual grievance redress mechanism process flow in **Section 2.6**.

Role/ Position Title	Responsibility
Social Safeguards Specialist / Environmental Safeguards Specialist	<ul style="list-style-type: none"> ▪ Design grievance reporting and recording templates; make available to field staff, ▪ Communicate grievance recording and reporting procedures to field staff, ▪ Receive grievance forms from the regions, inclusive of grievance logs of persons visiting regional offices to file grievances, ▪ Direct persons wishing to file grievances via telephone or email- phone calls to involve follow-up visits to complete

¹ This means that the issue has a high probability and/or major consequences for the project.

Role/ Position Title	Responsibility
	<p>grievance forms; emails/letters to involve directives to complete grievance forms,</p> <ul style="list-style-type: none"> ▪ Receive report of follow-up action by Lead Extension Officers towards resolution of level 1 grievances, ▪ Investigate unresolved level 1 as well as all level 2 grievances by liaising with the external stakeholder/s, ▪ Develop resolutions and actions to rectify any issues, ▪ Submit reports on redress taken in response to level 2 grievances to IST Safeguards Advisor, ▪ Filter level 3 grievances to IST Safeguards Advisor and the Grievance committee, ▪ Develop resolutions and actions to rectify any issues, ▪ Follow up and track progress of grievance redress, ▪ Document any interactions with external stakeholders, ▪ Monitor the MIS for grievances and assign a safeguard specialist, ▪ Ensure the grievance mechanism procedure is being adhered to and followed correctly (at regional offices and PIU). Maintains electronic records of grievance register and monitor any correspondence, ▪ Facilitate design of grievance mechanism communication plan with PIU Communication Officer, ▪ Raise awareness of the grievance mechanism among relevant internal/external stakeholders- PSAs and flyers ▪ Report the status of grievances to management and inform to extension offices.
Extension Officer (Agriculture; Fisheries; Forestry)	<ul style="list-style-type: none"> ▪ Ensure that office staff are instructed in handling of grievance forms, ▪ Receive completed grievance forms and logs from front line field staff, ▪ Address level one grievances- through follow-up (Field verification exercises; and follow-up with PIU (esp. Approval Committee), ▪ Complete and submit grievance register and log, along with completed grievance forms to PIU, ▪ Ensure that follow-up phone calls are made to persons who filed grievances, ▪ Submit report to PIU Safeguards officers on action taken on level 1 grievances identified and addressed.
PIU Manager	<ul style="list-style-type: none"> ▪ Provide information and assistance to SSS and ESS in developing a response and close out of a grievance, ▪ Develop resolutions and actions to rectify any issues with GC, ▪ Monitor timeliness of resolutions for grievances,

Role/ Position Title	Responsibility
Implementation Support Team (IST) Safeguards Adviser	<ul style="list-style-type: none"> ▪ Support development of grievance register, logs and reporting templates, ▪ Support development of grievance categories- level 1, level 2, level 3- including examples, ▪ Provide information and assistance in developing a response and close out of a grievance, ▪ Develop resolutions and actions to rectify any issues.
Ministry of Agriculture Food and Fisheries	<ul style="list-style-type: none"> ▪ Technical advisory support to the PIU with accessing stakeholders who can facilitate the resolution of a grievance, ▪ Assign human resource personnel towards grievance investigation activities. For example, in cases where tests are needed to resolve pollution related grievances, ▪ Ensure representative serves on grievance committee.
Department of Forestry	<ul style="list-style-type: none"> ▪ Technical advisory support to the PIU with accessing stakeholders who can facilitate the resolution of a grievance, ▪ Assign human resource personnel towards grievance investigation activities. For example, in cases where tests are needed to resolve pollution related grievances

2.1.2 Grievance Reporting Channels

The EALCRP PIU will communicate this procedure to its external and internal stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external stakeholders to vocalize their grievances formally include:

- **Anonymous Complaints:** Anonymous complaints may be filed with the Emergency Agricultural Livelihoods and Climate Resilience Project, Project Implementation Unit, using the **Telephone Number 767 266 3998** or in person.
- **Email:** A complainant can email the EALCRP PIU to complain. Complainant will receive email acknowledging complaint and be advised to complete a grievance form and sign (electronic or by reporting to nearest office).
- **Social Safeguards Specialist** (Email: Attention Social Safeguards Specialist- dealcrp@dominica.gov.dm)
- **Environmental Safeguards Specialist** (Email: Attention Environmental Safeguards Specialist- dealcrp@dominica.gov.dm)
- Write a letter to the EALCRP PIU to complain (respond to letters via telephone or email, inviting complainant to complete an official grievance form/transfer information from letter to grievance form; record complaint in log)

- Telephone: Complainants can call the EALCRP PIU at:
 - I. Social Safeguards Specialist (266 3779)
 - II. Environmental Safeguards Specialist (266 3779)
- In Person: Complainants can report to the PIU office or a regional agricultural office, to complete and submit a grievance form, (EALCRP Project Implementation Unit (PIU) at DAPEX Building, Fond Cole. They can also register their complaint directly to:
 - o Social Safeguards Specialist
 - o Environmental Safeguards Specialist

All complaints or grievances received by the PIU will be registered in the Grievance log book, PIU staff will be trained to assist persons with completing grievance form. Log and completed forms will be handed over to Social Safeguards Specialist/Environmental Safeguards Specialist for further action.

2.2 Grievance Committee

If the grievance continues to be unresolved, a Grievance Committee will be consulted. Committee shall consist of the following representatives:

- Social Safeguards Specialist
- Dominica Association of Industry (DAIC)
- Dominica Export and Import Agency (DEXIA)
- Ministry of Environment, Climate Resilience, Disaster Management and Urban Renewal
- A representative from Planning or Ministry of Housing and Land (Surveys)

All grievances that have been classified as high risk (Level 3) that have been investigated and have not been resolved by the EALCRP PIU (SSS/ESS) or the resolution has not been accepted by the complainant will be referred to the Grievance Committee (GC). The GC will convene a meeting to review the grievance under consideration, having been briefed by the PIU Manager and Social Safeguards Specialist/Environmental Safeguards Specialist and presented with the requisite information pertaining to the complainant. In the case that an investigation has taken place and the PIU finds there is insufficient evidence, the complainant will be granted five (5) business days to provide evidence or witness statements to the PIU for onward submission to the GC. Once the Grievance Committee is satisfied with the quality, accuracy and authenticity of the information, the Committee will submit to the Bank for review and suggestion of a resolution. The resolution as informed by the Bank will be communicated to the complainant, who will be informed officially in writing by the PIU. Alternatively, the Committee could hold a mediation session with complainant where necessary.

2.3 World Bank Grievance Redress

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

2.4 Types of Complaints/Grievances

The following general categories of complaints/grievances will be considered to be within the scope of the EALCRP’s GRM:

- Communications – information on the project or consultation related issues.
- Project and process – any grievance related to the project description, process (**e.g. registration, eligibility criteria, Selection of Beneficiaries, Request for Bids, Call for Expressions of Interest**) design or scope of the project.
- Project performance – a grievance related to the project performance, failure to implement as promised or commitments of the project.
- Legal – grievance accusing the project or personnel of breaking the law or government regulations.
- Environment, Health, Safety, Social or Community (HSEC) – complaints related to any of the safeguard standards.

Complainants will be required to complete the Complaint Form in Annex 2.

2.5 Grievances Levels

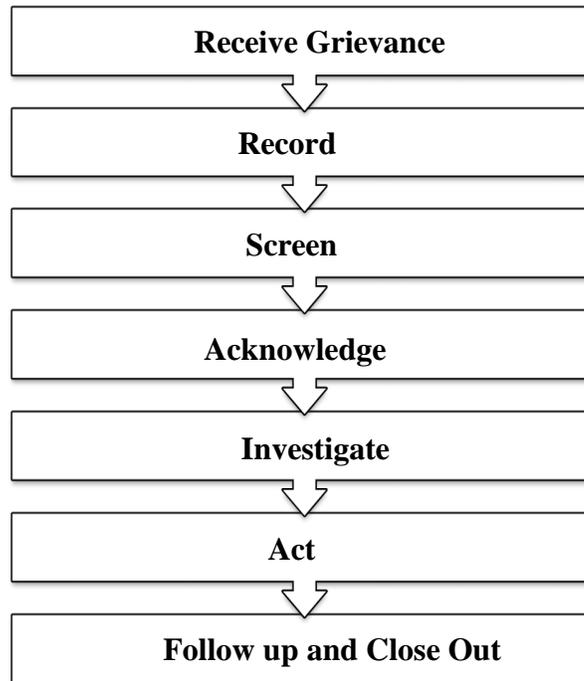
Complaints or grievances for this project will be classified as Level 1 (Low Risk), Level 2 (Substantial Risk) and Level 3 (High Risk). While all complaints or grievances are considered important and critical, Levels 2 and 3 are classified as high priority, with Level 3 being the highest priority. Levels 2 and 3 requires immediate intervention of the PIU Manager, IST Safeguards Adviser, or Grievance Committee.

Grievance Category	Description	Internal response	Responsibility
Level 1 (low risk)	When an answer can be provided immediately and/or Emergency Agriculture Livelihoods and Climate Resilience Project PIU are already working on a resolution. <i>Examples include issues with the validation/approval notification;</i>	Respond immediately to complainant. Record and report as part of overall reporting process and inform the PIU Manager. Does not require internal consultation	Lead Extension Officer/Social Safeguards Specialist / Environmental Safeguards Specialist

Grievance Category	Description	Internal response	Responsibility
	<p><i>communication of information regarding application process, deadlines and collection of inputs. All attempts to report non EALCRP issues can be dismissed and treated at this level.</i></p>		
<p>Level 2 (substantial risk)</p>	<p>One off grievance that requires measured response and actions/commitments to resolve complaint.</p> <p><i>Examples include: dissatisfaction with inputs received/qualified for; reports of lost documents in cases where originals got lost during the application process due to staff error; conflict emerging from validation exercise with Extension Officer; reports of land and water pollution, pesticide application issues, complaints about disbursement and other project timeline issues; complaints about field staff; complaints about WNT works.</i></p>	<p>Needs input from PIU Manager, IST Safeguards Adviser and other relevant EALCRP team members.</p>	<p>Supervisor level or above Safeguards Specialist / Environmental Safeguards Specialist</p>
<p>Level 3 (high risk)</p>	<p>Legal violations on the part of project staff or beneficiaries; Repeated, extensive and high-profile grievances that may jeopardize the reputation of the Emergency Agriculture Livelihoods and Climate Resilience Project.</p> <p><i>Examples include- reports on fraudulent disbursement of inputs; sale of inputs; complaints over failure to deliver inputs promised; reports on ghost applicants- i.e. fraudulent applications; Encroaching on protected areas, human wildlife intervention</i></p>	<p>Needs input PIU Manager, IST Safeguards Adviser and/or Grievance Committee</p>	<p>Supervisor or Committee level</p>

3.0 THE GRIEVANCE REDRESS MECHANISM (GRM) PROCESS FLOW

Figure 1: Grievance Mechanism Process Flow Chart



STEP 1: Receive Grievance

Frontline staff will greet and welcome complainant, assign Complaint form once it is determined that grievance has to be filed. Staff to facilitate filing of grievance on form. (**Complaint Form, Annex 2**).

The Social Safeguards Specialist / Environmental Safeguards Specialist receives all grievances that are delivered via telephone, email or letter, and ensure that the relevant information is provided in order to record, assess and respond to the grievance. (**Complaint Form, Annex 2**).

STEP 2: Record

Front line staff: All grievances received and filed should be recorded in grievance log and submitted to PIU. All grievances that are delivered via telephone should also be logged in register. **Grievance Register (Annex 1)**

The Social Safeguards Specialist / Environmental Safeguards Specialist will complete the **Grievance Register (Annex 1)** for all grievances that are delivered via telephone, email or letter.

The Social Safeguards Specialist / Environmental Safeguards Specialist will review the Grievance Register and prepare and either:

- A. follow-up with Lead Extension Officers to confirm resolutions executed;
- B. follow-up with complainant and execute a redress;
- C. make referrals to the Grievance Committee, seeking redress for complaints. SSS and ESS to complete a **Grievance Report using Annex 3 template**.

STEP 3: Screen

The Social Safeguards Specialist/ Environmental Safeguards Specialist will do the initial assessment of whether the grievance is a level 1, 2 or 3. Lead Extension officer to also screen grievances received to determine if any are level 1 and could be addressed by him/herself. If the assessment reveals that it may be a level 2 or 3, the Social Safeguards Specialist/ Environmental Safeguards Specialist will need to include the relevant parties (i.e. PIU Manager and/or IST Safeguards Adviser) to further analyze the grievance. **See Step 5 below.**

STEP 4: Acknowledge

A grievance will be acknowledged in writing or email, by the Social Safeguards Specialist/ Environmental Safeguards Specialist within five (5) working days of a grievance being submitted. Communication will be made either verbally or in written form to the complainant. The acknowledgement of a grievance will include a letter from PIU.

STEP 5: Investigate

The Social Safeguards Specialist/ Environmental Safeguards Specialist is responsible for investigating the grievance within 5-10 working days. High level cases will 10-20 working days. The investigation may require the safeguards specialists to make site visits and contact the complainant. Investigations to be supported by key technical specialists of the MoAFF, where necessary. All meetings and discussions must be documented during the investigation. Information gathered during the investigation will be analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

STEP 6: Actions and Commitments

Following the requisite investigations, the Social Safeguards Specialist/Environmental Safeguards Specialist will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. He or she is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Grievances identified as level 1, are capable of being addressed by Lead Extension Officer will involve stipulated follow-up

- i. Specialists will review all grievances sent to PIU- to determine level; level 1 grievances will be sent to Extension Officers, informing them of action to take towards a resolution.

- ii. Reports on level 1 grievances already attended to by Extension will be reviewed and follow-up made by SSS/ESS to affirm resolution. **(See Annex 4-Level 1 Grievance Report)**

Level 2 grievances will be dealt with by the SSS/ESS. For grievances identified as level 3, proposed action plans will be reviewed by PIU Manager and IST Safeguards Adviser, to advise on next steps. This may be action required to resolve the complaint or request further investigation is required **(Refer to Section 2.5)**.

Once all actions have been completed and the grievance has been resolved, SSS/ESS will then formally advise the complainant. Communication of proposed resolution will include a letter and a copy of the **Grievance Report (Annex 3)** prepared by the EALCRP PIU. If required, EALCRP PIU will request additional information or to clarify any issues.

STEP 7: Follow up and Close Out

The Social Safeguards Specialist/Environmental Safeguards Specialist will contact the complainant to verify that the grievance has been resolved and also gather any feedback on the grievance process. The Safeguards Specialists may need to follow up with the complainant on numerous occasions to confirm all parties are satisfied.

If the complainant is unhappy or not satisfied with the resolution and/or does not agree with the proposed actions, then the Social Safeguards Specialist/Environmental Safeguards Specialist will need to escalate the matter to PIU Manager and IST Safeguards adviser. If further action is required, the PIU Manager will escalate to the IST Safeguards Adviser and thereafter to the Permanent Secretary, Ministry of Agriculture and Fisheries as unresolved. The EALCRP PIU is committed to resolving complainant's grievance and as required will convene an independent Grievance Committee to resolve the grievance.

STEP 8: Reporting

The PIU Manager will receive monthly report/updates on all complainant grievances. Information outlining the number of grievances, time taken to arrive at resolution and outcomes of grievances will be communicated. The report will be prepared by the Social Safeguards Specialist/Environmental Safeguards Specialist.

If a complaint is unresolved for several months or considered a serious complaint or high risk to project then the PIU should inform the World Bank project team.

STEP 9: Records

All records, including grievance register and reports, investigation notes, interviews and minutes of meetings will be securely filed in a password protected, project grievance filing system and the EALCRP's intranet to ensure privacy and confidentiality is maintained for all parties involved.

All names or contact details of complainants will be held confidential and will not be released to an external party without the complainant's permission.

ANNEX 1 Grievance Register- Regional Office

Region:	Lead EO:
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No.	Type	Format	Date	Time	Complainant Details	Action Taken	Signatures
1.	Internal Stakeholder- Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- Regional Office In person- field [] Telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured- NGF [] Formal grievance filed [] Other (specify)	Officer: Complainant:
2.	Internal Stakeholder- Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- Regional Office In person- field [] telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured [] Formal grievance filed [] Other (specify)	Officer: Complainant:
3.	Internal Stakeholder- Applicant [] Internal Stakeholder: Staff [] External Stakeholder []	In person- Regional Office In person- field [] telephone [] PIU Office [] Other [] Specify			Name: Alias: Contact Information:	Applicant reassured [] Formal grievance filed [] Other (specify)	Officer: Complainant:

NGF- No grievance filed

ANNEX 2 COMPLAINT FORM

To be completed by Complainant

Please Note: Anonymous complaints may be filed with the Emergency Agricultural Livelihoods and Climate Resilience Project, Project Implementation Unit, using the Telephone Number 767 266 3998 or in person.

COMPLAINANT INFORMATION	
Name:	
Address:	
Phone:	
Email:	

COMPLAINT INFORMATION
Complaint Date:
Complaint Location:
Complaint Details:
Suspected cause of the problem:
What should be considered to avoid a repeat of the problem?
Name of person completing this form:
Signature:
Date:

ANNEX 3 GRIEVANCE FOLLOW-UP REPORT

To be completed by SSS/ESS Only

Date Complaint Received	Day ____/ Month ____/Year _____	
Time Complaint Received		
Name of Complainant		
Type of Complainant	<input type="checkbox"/> Internal Stakeholder (staff) <input type="checkbox"/> Internal Stakeholder (beneficiary) <input type="checkbox"/> External Stakeholder	
Complainant Contact Information	Address: Telephone: Email:	
Type of Complaint	<input type="checkbox"/> Communication (e.g. information on the project or consultation related issues) <input type="checkbox"/> Project and Process-Application (e.g. registration, eligibility, beneficiary selection, etc.) <input type="checkbox"/> Project Process- Implementation (e.g. beneficiary agreement, vouchers, distribution of inputs, training, etc.) <input type="checkbox"/> Project Performance (e.g. failure to implement as promised or commitments) <input type="checkbox"/> Legal (e.g. non-compliance with Laws & Regulations) <input type="checkbox"/> Environment, Health, Safety, Social or Community <input type="checkbox"/> Other (specify)	
Grievance Level	<input type="checkbox"/> Level 1 (Low Risk) <input type="checkbox"/> Level 2 (Substantial Risk) <input type="checkbox"/> Level 3 (High Risk)	
PIU Action or measure to be taken		
Requires PIU Manager's / IST Safeguards Adviser Intervention	<input type="checkbox"/> YES <input type="checkbox"/> NO	If yes, explain why:
Requires Grievance Committee Intervention	<input type="checkbox"/> YES <input type="checkbox"/> NO	If yes, explain why:
Grievance Resolution Offered	<input type="checkbox"/> Accepted <input type="checkbox"/> Not Accepted:	

**Social Safeguards Specialist/
 Environmental Safeguards Specialist:**

Date:

ANNEX 4 LEVEL 1 GRIEVANCE FOLLOW-UP REPORT

To be Completed by LEAD EXTENSION OFFICER Only

Date Complaint Received	Day____/ Month ____/Year _____
Time Complaint Received	
Name of Complainant	
Type of Complainant	<input type="checkbox"/> Internal Stakeholder (staff) <input type="checkbox"/> Internal Stakeholder (beneficiary) <input type="checkbox"/> External Stakeholder
Complainant Contact Information	Address: Telephone: Email:
Type of Complaint	<input type="checkbox"/> Communication (e.g. information on the project or consultation related issues) <input type="checkbox"/> Project and Process-Application (e.g. registration, eligibility, beneficiary selection, etc.) <input type="checkbox"/> Project Process- Implementation (e.g. beneficiary agreement, vouchers, distribution of inputs, training, etc.) <input type="checkbox"/> Project Performance (e.g. failure to implement as promised or commitments) <input type="checkbox"/> Legal (e.g. non-compliance with Laws & Regulations) <input type="checkbox"/> Environment, Health, Safety, Social or Community Other (specify)
Grievance Level	Level 1 (Low Risk): DETAILS/JUSTIFICATION:
Action Taken	
Requires PIU Manager's / IST Safeguards Adviser Intervention	YES <input type="checkbox"/> NO <input type="checkbox"/> If yes, explain why:
Requires Grievance Committee Intervention	YES <input type="checkbox"/> NO <input type="checkbox"/> If yes, explain why:
Grievance Resolution Offered	Accepted Not Accepted:

Lead Extension Officer: **Region:**

Date: