

# GRIEVANCE REDRESS MECHANISM (GRM)



**d'madd**

Digital Maldives for  
Adaptation, Decentralization  
and Diversification



**Ministry of Homeland Security  
and Technology**



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## **Introduction**

As outlined in Paragraph 61 of the Project Appraisal Document, The Digital Maldives for Adaptation, Decentralization and Diversification (DMADD) Project have set up a dedicated Grievance Redress Mechanism (GRM) for people and organisations to report their concerns or complaints. The DMADD ensures that the GRM is equipped to register and respond to complaints related to project activities.

The (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise in the project, either due to the actions of the project staff and from affected communities and external stakeholders. The PMU is responsible for managing the GRM. The Project will administer the GRM process and determine the best course of action to resolve the grievance. Further, the project affected persons as well as other interested parties will be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultation meetings and other stakeholder engagement activities.

## **Purpose**

The GRM for DMADD Project, is established to provide an organized and transparent process for citizens, stakeholders, and project beneficiaries to voice their concerns, register complaints, and seek resolutions related to the DMADD Project to improve overall satisfaction with DMADD services and operations.

## **Objective**

The objective of the GRM is to provide a clear channel for individuals and organizations to express concerns or grievances regarding DMADD project's initiatives, ensuring prompt and effective resolution of grievances while maintaining transparency, accountability, and public trust in the DMADD project.

## **Grievance Categories**

Grievances submitted to DMADD can encompass a wide range of issues, including but not limited to:

- Unsatisfactory interactions with DMADD staff or representatives (including harassment).
- Issues with DMADD services and delivery.
- Impact of implementation on the natural environment and constructed infrastructure.
- Concerns regarding data privacy and security.
- Accessibility issues for people with disabilities.
- Other relevant issues.

## **Grievance Submission:**

Grievances can be submitted through various accessible channels, including:

- Online Portal: A dedicated website for submitting grievances related to DMADD.
- Printed Form: To be made available at reception or office, online printing.
- Email: A designated email address for grievance submission.
- In-Person: Physical grievance submission at DMADD's regional offices or government service centers.
- Telephone: A dedicated grievance hotline for voice complaints.
- Digital messaging services such as official social media accounts.

### Grievance Management Process:

The grievance management process is structured as follows:

- **Lodging:** Individuals, stakeholders, service providers, clients, contractors may lodge a case with proper justification and available evidence through a mechanism provided (in the Grievance Submission Section)
- **Acknowledgment:** Upon receiving a grievance, an acknowledgment will be sent to the complainant within 24 hours.
- **Review:** The grievance will be reviewed by the grievance committee to determine its validity and seriousness.
- **Investigation:** Relevant departments or authorities within DMADD will investigate to gather necessary information and facts.
- **Resolution:** A resolution will be proposed and implemented based on the nature of the grievance, within a reasonable time frame.
- **Communication:** Regular updates on the status of the grievance will be provided to the complainant. Updates will be provided in a preferred manner as indicated by the complainant (i.e. digital measures or telephone)
- **Escalation:** The process will include tiers where unsatisfactory response can be escalated to a higher level. (see table below)
- **Closure:** The grievance should be considered closed once the resolution is completed.

### GRM Standard Operating Procedure

Tier	SOP	Person Responsible	Time Frame
T1	Throughout the project life cycle, the DMADD will obtain services from firms. The firms should have an internal GRM Focal Point (FP) tied to the DMADD project.	The Firm	Within 5 days of signing the contract
	Any Grievances arising from such a firm shall be lodged to the focal point of the firm, via the official forms provided in this GRM. It is advised to provide any proof of the incident.	Complainant	Within 7 days of the incident
	Issue a formal receipt of the complaint to the aggrieved party.	GRM Focal Point from the firm	Physical receipt immediately after receiving the form at reception of office.  Same day for complained received via digital mechanisms
	The FP must update the incident and share the submitted documents via email to the DMADD team	GRM Focal Point from the firm	Within 2 hours of the reporting.
	The FP will screen the grievance to determine whether the grievance is related to DMADD project or not with consultation from the DMADD PMU.	GRM Focal Point from the firm	Within 3 days

	<p>After screening:</p> <p>a) If not related to the DMADD project, then inform the aggrieved party of such in writing, copied to DMADD Project. In cases where the recipient is unable to read the document, the issued document may be read to the person in the presence of a witness and the witness should declare their witness to this event.</p> <p>b) If the incident is related to the project, the aggrieved party will be informed in writing, copied to DMADD Project, how the case will be processed as per this GRM. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness (chosen by the aggrieved party) and the witness should declare their witness to this event.</p>	GRM Focal Point from the firm	This should occur within 03 working days of receiving the complaint.
	<p>Where the grievance is related to the project, the firm will come up with a solution either by</p> <p>(i) discussing internally, and with DMADD PMU staff, and taking relevant action or;</p> <p>(ii) Discussing with the aggrieved party and coming up with an amicable solution</p>	GRM Focal Point from the firm	10 Working days

Step	SOP	Person Responsible	Time Frame
1	<p>Throughout the project life cycle, the DMADD will obtain services from firms and individual consultants. The firms should have an internal GRM Focal Point (FP) tied to the DMADD project.</p> <p>and similarly,</p> <p>The project stakeholders shall identify and attach a GRM Focal Point (FP) to the DMADD project.</p>	The Firm/ Stakeholder	Within 5 Working days of signing the contract
2	Any Grievances arising from actions taken by the firm shall be lodged to the focal point of the firm, via the official forms provided in this GRM. It is advised to provide any proof of the incident.	Aggrieved party	Within 7 days of the incident
3	Issue a formal receipt of the complaint to the aggrieved party.	GRM Focal Point from the Firm	<p>Physical receipt immediately after receiving the form at reception of office.</p> <p>Same day for complained received via digital mechanisms</p>
4	The FP must update the incident and share the submitted documents via email to the DMADD team	GRM Focal Point from the firm	Within 2 hours of the reporting.

5	The FP will screen the grievance to determine whether the grievance is related to DMADD project or not with consultation from the DMADD PMU.	GRM Focal Point from the firm	Within 3 Working days
6	After screening: a) If not related to the DMADD project, then inform the aggrieved party of such in writing, copied to DMADD Project. In cases where the recipient is unable to read the document, the issued document may be read to the person in the presence of a witness and the witness should declare their witness to this event. OR b) If the incident is related to the project, the aggrieved party will be informed in writing, copied to DMADD Project, how the case will be processed as per this GRM. If the aggrieved party is unable to read (for whatever reason) the issued letter should be read to the person in presence of a witness (chosen by the aggrieved party) and the witness should declare their witness to this event.	GRM Focal Point from the firm	This should occur within 03 working days of receiving the complaint.
7	Where the grievance is related to the project, the firm will come up with a solution either by a) discussing internally, and with DMADD PMU, and taking relevant action OR b) Discussing with the aggrieved party and coming up with an amicable solution that do not deviate from the project goals.	GRM Focal Point from the firm	Within 07 working days of receiving the complaint.
8	Once a solution is reached or if the firm comes to a standstill with the aggrieved party, the firm forward the case in writing to the PMU.	GRM Focal Point from the firm	This should occur within 15 working days of receiving the complaint.

## **Tier 2: Escalation to the GRM Committee**

The grievance committee will address complaints, which will be logged, tracked, and promptly resolved during and after project implementation. The committee will consist of members assigned by the stakeholder agencies and will be chaired by the Project Manager. With respect to the digital identification platform and the issuance of new ID credentials, MoHST and DNR will also make grievance reporting accessible through multiple channels, e.g., online, by phone, in-person, and put in place mechanisms to facilitate timely response and redress. MoHST and DNR will share biannual summary reports detailing the number and categories of complaints and other feedback received, the action(s) taken to respond to and address them, and report on cases that remain unresolved.

The Project will establish a Grievance Redress Committee (GRC). Project related GRM will be available for project stakeholders including project affected persons, to submit complaints/grievances, questions, comments, and suggestions, or provide any form of feedback on all project-funded activities. The GRM will be easily accessible to the aggrieved parties irrespective of their ethnicity, religion, gender, and other social and economic differences. Moreover, it will ensure its transparency, efficiency and accountability in grievance handling and responding while winning the confidence of

the complainants. Complainants' identity will be kept confidential unless permission is given by complainant, in writing, to share identity information. The GRM will endeavour to resolve the grievances locally, and to avoid lengthy court procedures. The GRM will be managed and coordinated by the PMU to be set up for the Project. The Environmental and Social Specialist for the project will act as GRM focal for the project.

The Grievance Redress Committee will be chaired by the Project Manager. The remaining members of the committee will comprise representatives from (i) National Centre for Information Technology (NCIT); (ii) Ministry of Tourism and Environment (MoTE); (iii) Department of National Registration (DNR); and (ii) Communications Authority of Maldives (CAM).

The GRC will convene its meetings when a grievance has been lodged. The committee will also consult the relevant technical experts or other partner agencies and carry out site visits, when required. GRC will reach a settlement through consensus among its membership.

Step	SOP	Person Responsible	Time Frame
1	If the Aggrieved party does not accept the decision of the firm, a written request shall be submitted to the MoHST addressed to the GRC of the DMADD project	Aggrieved party	Within 5 days of written response from firm/ stakeholder
2	Issue a formal receipt of the complaint to the aggrieved party.	DMADD PMU	Physical receipt immediately after receiving the form at reception of office.  Same day for complained received via digital mechanisms
5	The DMADD must update the incident registry and create a file, and hold a meeting of the GRC	Social Specialist (from which agency?)	Same day as complained received
6	Convene the GRC committee	DMADD PMU	Within 2 working days of the complaint.
7	The GRC will evaluate the original complaint, response by tier 1 and the complaint submitted to the GRC and determine an amicable solution that will not hinder the goals of the project while at the same time addressing and resolving the concerns of the Aggrieved party	GRC committee	10 days
8	Once a solution is reached with the aggrieved party, the GRC may close the case in writing, and through verbal recitation of the writing, to the person in presence of a witness (chosen by the complainant) and the witness should declare their witness to this event.	Social Specialist	4 days

The GRC will conclude its proceedings within a period of 14 days since receiving of the grievance. If an agreement or resolution is reached, the key points of the agreement/resolution will be summarized, documented, and signed by both the affected person and the GRC.

**Transparency and Accountability:**

To ensure transparency and accountability, DMADD will:

- Provide regular reporting on the status and outcomes of grievances.
- Publish an annual report summarizing grievances, resolutions, and actions taken.
- Facilitate oversight by an independent body to review the effectiveness of the GRM and adherence to established procedures.

Reporting, however, will ensure confidentiality of the complainants.

**Grievance Records:**

All grievance records will be securely maintained for the period of the project and in accordance with document retention and archiving laws, regulations, and policies of the Republic of Maldives.

**Training and Capacity Building:**

DMADD staff responsible for grievance resolution will receive training to ensure a consistent and professional approach to grievance handling, including respecting confidentiality. Training will also focus on what actions to be taken for highly sensitive cases, especially cases involving Sexual Exploitation and Abuse or Sexual Harassment (SEA/SH).

**Accessibility and Inclusivity:**

The GRM will be designed to be accessible to all, including individuals with disabilities and those who may not have easy access to digital channels, aligning with DMADD Project's commitment to inclusivity.

**Continuous Improvement**

The GRM will be subject to periodic reviews and adjustments to enhance its effectiveness and responsiveness to evolving stakeholder needs and project developments.

**Feedback and Public Awareness:**

DMADD Project will encourage citizens and stakeholders to provide feedback on the GRM process and conduct public awareness campaigns to inform the community about the availability and function of the grievance redress mechanism.

By implementing this Grievance Redress Mechanism for the Digital Maldives for Adaptation, Decentralization and Diversification (DMADD) project, the project can ensure that concerns and grievances are addressed promptly and fairly, contributing to increased trust and the overall success of the DMADD project.