

REPUBLIC OF THE MARSHALL ISLANDS SUSTAINABLE NEERGY DEVELOPMENT PROJECT



HOW TO GET INFORMATION OR RAISE A CONCERN ABOUT THE RMI SUSTAINABLE ENERGY DEVELOPMENT PROJECT

Grievance Redress Mechanism

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Prepared by
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Contact Information

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1. Introduction

This document is relevant to anyone who has an interest in the RMI Sustainable Energy Development Project (SEDeP). This includes members of the public who would like information about the project, as well as people who wish to express concerns or make complaints about the project.

The purpose of the SEDeP is to increase the share of renewable energy generation in the RMI, and enhance the reliability of electricity supply and improve energy efficiency in the Project Areas.

Direct project beneficiaries include electricity consumers (residential, commercial, industrial, and government) in RMI who will benefit from an improved and more efficient and reliable electricity supply, and eventually from more affordable and sustainable tariffs. By reducing the dependence on imported fuel with volatile prices and supplies, the project will benefit the country as a whole by reducing subsidies to the sector, which can be used for other high priority sectors such as health, education, and other key infrastructure. Policy and decision makers, as well as planners and managers and technical staff of the utilities will also benefit from strengthened technical capacity. Finally, a cleaner energy mix will have global environmental benefits by contributing to the reduction of GHG emissions.

SEDeP comprises 3 components and various sub-components as follows:

Component 1: Renewable Energy Investments

- Sub-component 1.1: Renewable Energy Development in Majuro.
- Sub-component 1.2: Supply and Installation of Gensets for Majuro and Ebeye

Component 2: Promotion of Energy Efficiency and Loss Reduction Program

- Sub-component 2.1: Loss Reduction Program in Ebeye
- Sub-component 2.2: Demand Side Energy Efficiency

Component 3: Technical Assistance, Capacity Building and Project Management

- Sub-component 3.1: Technical Assistance and Capacity Building
- Sub-component 3.2: Preparation of Renewable Energy Projects in Ebeye and the Outer Islands
- Sub-component 3.3: Project Management (US\$1.985 million).

The project implementing agency is MEC, with support provided by KAJUR, EPD, MFBPS, DIDA, and MWSC in accordance with the provisions of a Memorandum of Understanding entered between the organizations.

If you would like more information about the SEDeP, please do not hesitate to contact any member of the Project team or any staff from the Division of International Development Assistance (DIDA), Ministry of Finance. We also welcome suggestions about how to improve the Project, including communication with the public, so please feel free to contact the Project Team if you have ideas. Project contract information can be found on pages ii and 6.

2. Purpose of the SEDeP GRM

In addition to requesting information and making suggestions, concerns (also called grievances) can be raised about any aspect of the SEDeP, including project activities, services, environmental or social impacts, safety issues and about the behavior or attitudes of people carrying out project works. This includes issues related to physical or sexual harassment, abuse, or violence.

The process of making a complaint and ensuring that concerns are fully investigated and addressed is called a Grievance Redress Mechanism (or GRM).

The purpose of the SEDeP GRM is to ensure that:

- ✓ the basic rights and interests of everyone affected by the Project are protected,
- ✓ all concerns about the Project during predesign, design, construction and post construction phases are addressed in a fair, timely and effective manner,
- ✓ the Project makes adjustments and improvements in response to people's concerns and feedback.

This document explains the process that will be used to investigate and resolve any concerns that are raised as quickly and respectfully as possible.

The SEDeP recognizes that there are different kinds of issues that may arise, so it provides for two different pathways: one for general issues and one for “serious or sensitive” matters that may require the involvement of external agencies such as the police or counselling services.

If you are concerned, or you know someone who is concerned, about any aspect of the SEDeP, please contact the Project Manager or anyone else working on the project (see page 6) as soon as possible.

3. How the SEDeP GRM Operates

The SEDeP GRM covers the entire duration of the project because questions and concerns can arise at any time, including design, implementation and construction and post-construction phases.

Key Points

- ✓ The SEDeP GRM only deals with project related matters.
- ✓ The SEDeP GRM can be used by an individual or by a group of people who have concerns about how the project is impacting their lives.
- ✓ Grievances can be raised in an open and public manner, or anonymously and in confidence.
- ✓ The identify of people who make a complaint will be kept confidential and all documentation related to the concern will be kept in a secure location that can only be accessed by the Project Manager.

- ✓ To avoid conflicts of interest, the SEDeP GRM provides different options for lodging a complaint (see page 7). This means that people can raise their concerns with someone they are not personally connected with and can also choose to talk with either a man or a woman. This is especially important in situations that involve gender-based violence, sexual exploitation, abuse, or harassment (see Section 4).
- ✓ There are different kinds of issues that could arise during project implementation which require different kinds of responses such as “series or sensitive” matters as explained in the next section.
- ✓ There is a person in charge of making sure that the SEDeP GRM process operates properly, and that person is called the “Designated Contact Person” or the “DCP”,
- ✓ The SEDeP Project Manager is the DCP for all grievances and will stay involved until the matter is resolved and will be the main point of contact for person(s) making the complaint. Note: during the construction period, the Construction Site Supervisor (CSS) can serve as the DCP until the matter is resolved or transferred to the Project Manager,
- ✓ If concerned persons are unsure who to contact, they can seek information or raise grievances with any staff involved project implementation who will immediately direct the matter to the appropriate party for resolution.
- ✓ The intent of the GRM is to solve problems, to everyone’s satisfaction, as quickly as possible. This will be done in accord with existing systems and processes where other agencies are involved.
- ✓ The SEDeP GRM is not a substitute for legal or other public or civic resolution mechanisms and does not remove people’s right to take their grievance to a formal dispute-resolution mechanism.
- ✓ The SEDeP GRM provides important information about how well the project is functioning and what improvements are required based on the kinds of concerns that arise. The Project Manager is responsible for regular reporting of all grievances to the RMI Government and to the World Bank (complaint names are kept confidential).

Step-by-Step Process

Figure 1 (page 5) shows how the SEDeP GRM operates, as well the maximum time allowed for each step of the process to ensure resolution occurs as quickly as possible. This process is summarized below.

Step 1: The SEDeP GRM process begins when an “Aggrieved Party” (the “AP” or the person making the complaint) raises a concern to a Project employee, contractor or someone at the DIDA Office. The person who receives the complaint is called the “Recipient”. The Recipient is required to pass this information to the Project Manager (the DCP) or to the Construction Site Supervisor (the CSS) within 12 hours using the SEDeP Grievance Form (see Page 10)

Step 2: After receiving the complaint, the DCP will document or “log” the concern in the SEDeP Complaints Register. This will serve as an official record that a complaint has been received and when the matter has been resolved.

Step 3: The DCP will determine whether the concern is related to the Project, and if it is, the investigation will begin immediately (see Step 4). If the matter is not related to the SEDeP, the AP will be referred to the appropriate authority to resolve the issue and the matter is closed on the Complaints Registry.

Step 4: The DCP will determine if the complaint relates to a serious or sensitive matter. If it does, the DCP will immediately refer the matter to the Chief Technical Officer (CTO) of the Marshall Energy Company (MEC) for further investigation and resolution. The DCP will notify the Centralized Implementation Unit (CIU) of the RMI Ministry of Finance and the World Bank.

“Serious or sensitive matters” refer to issues involving potential criminal activity, political interference, conflicts of interest, corruption, land claims, gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH) violence against children (VAC) or human trafficking (HT).

In the case of potential criminal activity, it is important that SEDeP GRM processes do not impede investigation by the appropriate authorities. In situations involving land disputes or claims, the matter will be referred to the Project Steering Committee for immediate attention.

If the concern is related to GBV or SEAH, the Project will first seek to ensure that the victim is safe and has access to required support services. For these reasons, a referral will be made to the *WUTMI Weto in Mour: Violence against Women and Girls Support Service* (see page 7 for contact information).

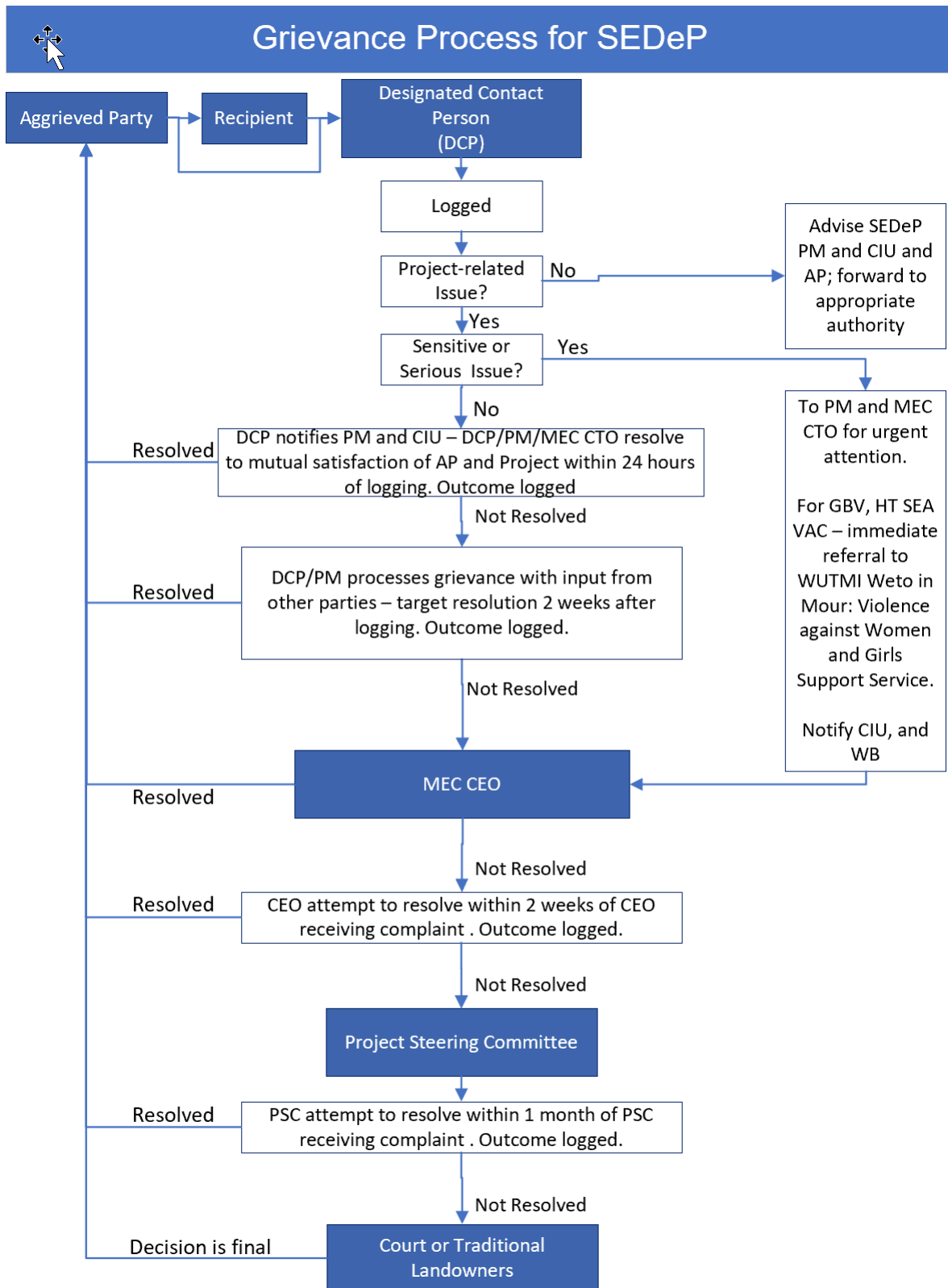
Step 4 (continued): After determining the grievance is project related but is not of a serious or sensitive nature, the DCP will attempt to resolve the concern to everyone’s satisfaction within 24 hours, or within 2 weeks if consultation with other parties is required. If resolution cannot be achieved, the DCP will refer the matter to the MEC Chief Technical Officer (CTO) for further investigation.

Steps 5-6: The PM and MEC CTO will attempt to resolve the concern within 2 weeks and if this is not achieved, the situation will be referred to the MEC Chief Executive Officer (CEO), who will also attempt to resolve the matter within 2 weeks.

Steps 7: If resolution has still not occurred following attempts by the MEC CEO, the Project Steering Committee (PSC) will have 1 month to resolve the matter.

Step 8: If the issue remains unresolved or the complainant is dissatisfied with the outcome proposed by the Project Steering Committee, the Aggrieved Person may refer the matter to the appropriate legal or judicial authority. The decision of the Court will be final.

Figure 2: SEDeP Grievance Redress Procedure



4. Gender-Based Violence, Sexual Exploitation, Abuse or Harassment and Violence against Children

If a complaint is related to gender-based violence (GBV), sexual exploitation, abuse, or harassment (SEAH), or violence against children (VAC), it will be immediately referred to the *WUTMI Weto in Mour: Violence against Women and Girls Support Service* (WUTMI - WIM). This will ensure that the safety and support needs of the victim are addressed sensitively, and as quickly as possible. WUTMI - WIM will also be responsible for assisting the victim initiate legal action as required.

In the event WUTMI - WIM becomes aware of a situation involving SEDeP-related GBV, SEAH or VAC, a staff member will contact the Project Manager, DIDA Safeguards Officer or MEC General Manager within 12 hours. At that point, the concern will be documented and an internal SEDeP investigation will commence. Throughout the referral and investigation process, it is critical that confidentiality is fully respected and that the safety and dignity of the victim is upheld.

In situations involving GRB, SEAH or VAC, the SEDeP will use a “**survivor-centered approach**”. This means that:

- The rights, needs, and wishes of the survivor (or victim) is the foremost priority of everyone involved with the project
- The survivor has a right to:
 - be treated with dignity and respect instead of being exposed to victim-blaming attitudes.
 - choose the course of action in dealing with the violence instead of feeling powerless.
 - privacy and confidentiality instead of exposure.
 - non-discrimination instead of discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status or any other characteristic.
 - receive comprehensive information to help her make her own decision instead of being told what to do.

The survivor-centred approach aims to create a supportive environment in which the survivor's rights are respected and in which she is treated with dignity and respect. The approach helps to promote the survivor's recovery and her ability to identify and express needs and wishes, as well as to reinforce her capacity to make decisions about possible interventions (UN Women)

5. How to Make a Complaint

For further information about the SEDeP or to raise a concern about the Project, please get in touch with any of the following people in person, by phone, mail or by email using this contact information:

In Person:

Majuro: Mr. Simione Bituwaqa, SEDeP Power Distribution Support Officer
MEC Office, Majuro MH 96960

or

Ms. Jessica Zebedee, Government of RMI (CIU) Safeguards Officer
DIDA Office, Delap Village, Majuro

By Phone:

SEDeP Project Manager, Mr. Simione Bituwaqa	(692) 456 8656 (692) 625-3827/3828/3829
DIDA Safeguards Officer: Ms. Jessica Zebedee	(692) 456 5233 / 625 5968
DIDA Safeguards Officer: Ms. Yumiko Crisostomo	(692) 329 8011
WUTMI (<i>if concern is about project related violence or abuse</i>)	(692) 625-6687
DIDA Safeguards Advisor: Ms. Colleen Peacock (Fiji)	(679) 999 4060

By Email:

SEDeP Project Manager, Mr. Kamalesh Doshi	kamaleshdoshi6@gmail.com
SEDeP Project Manager, Mr. Simione Bituwaqa	sbituwaga@mecrmi.com
DIDA Safeguards Officer: Ms. Jessica Zebedee	jess.zebedee@gmail.com
DIDA Safeguards Officer: Ms. Yumiko Crisostomo	mikefamilystore@gmail.com
WUTMI (project related violence or abuse)	wetoinmour@wutmi.com
DIDA Safeguards Advisors: Mr. Garry Venus or Ms. Colleen Peacock	gazza700@gmail.com colleen@tautai.com
MEC Chief Technical Officer: Mr. Steve Wakefield	rmipadirector@gmail.com

By Mail:

Project Manager, MEC, P.O. Box 1439, Majuro, Marshall Islands 96960

or

Safeguards Officer, DIDA, P.O. Box D Majuro, Marshall Islands 96960

6. GRM Information Handling and Storage

Every concern or complaint received by the DCP will be allocated a unique File identifier, such as SEDeP GRM – 2020 #1, SEDeP GRM – 2020 #2 etc.

A hard copy of the Grievance Report Form will be filed by the DCP in a locked filing cabinet, will be treated as confidential and will not be accessible to other people.

Details of each concern or complaint will be entered into a master file excel spreadsheet which will be stored by the SEDeP Project Manager in a password protected SEDeP Project sub-folder: [\\Safeguards\\Complaints.](#)

Information relating to GBV, SEA, HT or VAC will be treated as personal and confidential [retained within Project management and PSC] at all times and shall only be made available to WUTMI and approved authorities (such as the police) if required.

7. Communicating the GRM with Stakeholders

It is intended that SEDeP beneficiaries, and the wider community, are made aware of the project, how to get information, make suggestions and raise concerns. To this end, SEDeP will communicate information about the project and the GRM in the following ways:

Radio	This will involve public notices about the SEDeP, including project goals, activities, and work schedules and how to get further information or raise concerns.
Marshall Islands Journal	Newspaper articles will describe the SEDeP, including project goals, activities, and work schedules and how to get further information or raise concerns.
Internet	Project information and updates will be published on the websites as follows. rmi-mof.com/division-of-international-development-assistance/news-and-updates/ https://www.ciudidasafeguards.com/sedep
Notice Boards	In all areas where physical works is planned, a notice board will be installed outside each operational area, describing the project and identifying how to get further information and raise concerns.

8. Reporting and Learning

As outlined in Section 2, one of the purposes of the SEDeP GRM is to ensure that the project learns from its grievance process, reports on the kinds of issues raised, and makes improvements, as needed, in response to people's concerns and feedback. To this end, the following procedures will be followed:

1. Incident Reports

- Within 12 hours, Complaint Recipient must notify the Project Manager
- Within 12 hours, the Project Manager must complete the Grievance Form and initiate the investigation

2. Monthly Reports

- The Project Manager completes monthly reports that summarize all new complaints, enquiries and grievances received, the type of concern and the number of days it took to resolve the matter. Monthly reports also summarize the status of any outstanding matters from previous months.

3. Quarterly Reports

- The Project Manager completes a quarterly report for the MEC CTO, CIU, DIDA and the World Bank, that contains the following statistics:
 - Total number of grievances and complaints received
 - Total number of grievances and complaints resolved
 - Total number of grievances and complaints active
 - Total number of grievances and complaints unresolved
 - Average number of days to resolve grievances and complaints.
- Quarterly reports also need to specify any changes the project has made in response to existing or previous complaints.

4. Annual Reports

- The Project Manager completes an annual report that summarizes all grievance statistics and response information for that year. This information is provided to the MEC CEO and CTO, CIU, DIDA, the World Bank and the Project Steering Committee.

Immediate Reporting to DIDA and the World Bank by the Project Manager under the following circumstances:

1. Grievance or complaint is related to physical injury or death, including those incurred because of gender-based violence.
2. Grievance or complaint received relating to sexual exploitation, abuse or harassment (SEAH), violence against children or human trafficking.

Immediate Reporting to WUTMI-WIM by the Project Manager of the following:

1. Grievance or complaint is related to gender-based violence, sexual exploitation, abuse or harassment, or violence against children.

9. SEDeP Grievance Report Form

Grievance Reference #:

Electronic file reference #

Background Information: Summarize Details (attach further pages if necessary):

Note: If the complaint is related to gender-based violence (GBV), sexual exploitation, abuse or sexual harassment (SEAH) or violence against children (VAC), the situation must be immediately referred to the *WUTMI Weto in Mour: Violence against Women and Girls Support Service (WIM)*. ((692) 625-6687 or wetoinmour@wutmi.com)

Name of concerned party (or anonymous) and gender

Employee ID (If Employee)

Telephone

Email

Date of Raising of Concern

Date of 2 week deadline for initial resolution or escalation:

Actual date of close out:

Date, time, and location of Event leading to Concern:

Detailed account of the concern (Include names of persons involved) if known (attach further pages if necessary):

Are there any policies, procedures, guidelines that may have been violated (attach further pages if necessary):

Proposed solution or sought remedy (attach further pages if necessary):

Outcome of Concern (attach further pages if necessary):

Date and Signature of Entry into Record:

Date and Signature of Close-out: