

# **Moldova Higher Education Project**

## **GRIEVANCES REDRESS MECHANISM GUIDANCE**

**Chisinau 2023**

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## **Acronyms and Abbreviations**

ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
IDA	International Development Association
MHEP	Moldova Higher Education Project
MoER	Ministry of Education and Research
NGOs	Non-governmental organizations
PMT	Project Management Team
SA	Sexual Assault
SEA	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
WB	World Bank

## Glossary of Key Terms

**Applicant** is the person directly or indirectly affected by the Project or interested in the Project who submit a suggestion, concern or grievance or any other requests related to Project implementation.

**Complainant** is the person directly or indirectly affected by the Project or interested in the Project who submit a complaint.

**Feedback Mechanism** are tools and methods to collect, analyze, and respond to the opinions and needs of your stakeholders.

**Grievance Redress Mechanism (GRM)** include the procedures for receiving, examine/assess, and addressing project-related grievances and concern from Project’s beneficiaries, citizens, stakeholders, and other affected communities.

**Grievance** within the implementation of this project, is defined *as any type of feedback, such as requests, proposals, dissatisfactions, complaints, issues, concerns, suggestions, queries* sent by the Project’s stakeholders. In the following, within this guide, the notion of “grievance” will be used to mean all the assigned definitions.

**Stakeholders** are the persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively; Project’s beneficiaries (students, teachers, labor market representatives, parents), workers (including Project’s workers and institutions’ staff), local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g. authorities, and/or nongovernmental organizations, etc.

**World Bank’s Environmental and Social Standards** set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will: (a) support Borrowers in achieving good international practice relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance nondiscrimination, transparency, participation, accountability and governance; and (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement

## 1. Introduction

Moldova Higher Education Project (MHEP/ the Project) is a World Bank-financed Project to be implemented between May 2020 and December 2025. The total cost of credit is EUR 35.7 million (US\$39.4 million equivalent) financed by the International Development Association (IDA) and is provided to the Republic of Moldova in support of Moldova Higher Education.

The Project Objective is to improve the labor market orientation of selected higher education institutions and the quality assurance mechanisms.

The Project is organized around three components (Component 1 – Improving the Quality Assurance Mechanisms; Component 2 – Improving the Labor Market Orientation through Targeted Interventions; Component 3 – Project Management) and includes systemic interventions in the areas of higher education quality, financing and management, as well as a targeted program to be implemented by selected higher education institutions and pedagogical colleges to address some of their most pressing needs in labor market orientation.

The Project does not directly finance activities that generate the significant environmental and social impacts. The minor civil works started or to be carried out in the pedagogical colleges do not generate adverse environmental impacts on or substantial risks to the human population. The likely impacts are predictable, temporary, reversible, low in magnitude, site specific, limited to the immediate surroundings, and can be managed through the implementation of cost-effective mitigation measures. No adverse impacts such as involuntary land acquisition, as well as impacts on indigenous peoples, biodiversity and habitats are identified.

A Stakeholders Engagement Plan (SEP) was developed at preparation stage of the Project and is being implemented during the MHEP life cycle according to the World Bank's Environmental and Social Standards, legislation of the Republic of Moldova and best practices. The SEP was developed according to the Environmental and Social Standard 10 of the World Bank (ESS10) during the MHEP preparation, and the monitoring of their implementation is ensured by the Ministry of Education and Research (MoER).

According to Project's prepared SEP, there are several groups of people and social groups who are interested in the Project on different levels, as following:

- People, social groups and organization who will be directly or indirectly be affected by the project: This group mainly includes universities and their management boards, students and lecturers who will benefit from the proposed investments or be affected by the funding formula.
- People, social groups and organizations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group mainly includes governmental entities such as the ministries, the business community from various sectors, the National Employment Agency.
- Vulnerable and disadvantaged groups:
  - biological and social orphans;
  - children with severe physical and sensory disabilities;
  - children whose parents have physical and sensory disabilities;
  - children whose parents participated in the Moldovan war for territorial integrity and independence as well as those who participated in the liquidation of Chernobyl nuclear disaster;
  - households with more than four children;
  - graduates of high schools and technical colleges from Transnistria who completed their education according to the educational programs approved by the Moldovan authorities;
  - Roma communities;

- youth who completed their military service.

## *1.1. Regulatory Framework*

### *1.1.1. Provisions and Requirements on grievance resolution*

- **Administrative Code of Republic of Moldova, no.116/2018**

The administrative code establishes procedure for consideration of petitions of the RM citizens addressed to the relevant authorities/bodies for the purpose of ensuring protection of petitioners' rights and legitimate interests.

In this code the petition is understood as any the statement, claim, suggestion, appeal submitted to competent authorities, including a preliminary application challenging an administrative act or a failure to consider an application within the statutory deadline.

The Petitioner/Applicant who is not satisfied with the answer received on the preliminary application or did not obtain an answer within the statutory deadline has the right to appeal to the competent administrative court.

The Petition is addressed in written or electronic form in the state or other language according to the Law on functioning of languages on the territory of the Republic of Moldova.

The Petition must include: the name and surname of the petitioner; the petitioner's address and the e-mail; the name of the public authority; the subject of the petition and its motivation; the signature of the petitioner or his legal or authorized representative, and in the case of the petition transmitted in electronic form - the electronic signature. The anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined.

The general term in which an administrative procedure must be completed is 30 days, unless the law provides otherwise.

The general term runs from:

- a) the date provided for in the law for the exercise of an established attribution;
- b) the date of registration of the request by the hierarchically superior public authority or by the control authority;
- c) the date of registration of the complete application, as the case may be with all the necessary documents, or from the date on which the petition was transferred to the competent public authority. If the application is not complete, the public authority proposes the petitioner to submit the missing documents and sets a deadline for this.

- **World Bank's Environmental and Social Standards**

The WB's safeguard policies have been replaced in 2018 with the Environmental and Social Framework (ESF). Within the ESF, ten Environmental and Social Standards set out responsibilities for Borrowers. The Standards are designed to help Borrowers manage Project risks and impacts, as well as improve environmental and social performance, consistent with good international practice and national and international obligations. For a general overview of the ESF framework and all the standards in several languages, including English, French and Russian, please visit: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

The Environmental and Social Standard on **Stakeholder Engagement and Information Disclosure (ESS 10)** defines the requirements for stakeholder engagement. The objectives of the ESS 10 are the following:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.

- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

For the purpose of the ESS 10, “stakeholder” refers to individuals or groups who:

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

The Borrower/MoER will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower/MoER will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances. The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements.

- a) The grievance mechanism is expected to address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Borrower/MoER will inform the project-affected parties about the grievance process in the course of its community engagement activities, and will make publicly available a record documenting the responses to all grievances received; and
- b) Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed.
  1. The scope, scale and type of grievance mechanism required will be proportionate to the nature and scale of the potential risks and impacts of the project.
  2. The grievance mechanism may include the following:
    - a) Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a web site;
    - b) A log where grievances are registered in writing and maintained as a database;
    - c) Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
    - d) Transparency about the grievance procedure, governing structure and decision makers; and
    - e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.
  3. The Borrower/MoER may provide mediation as an option where users are not satisfied with the proposed resolution.

### *1.1.2. Gap analysis of national legislation and World Bank's requirements*

The table below included a Gap analysis of World Bank’s ESS 10 and Administrative Code of Republic of Moldova regarding the provisions and requirements related to grievances/complaints resolutions.

ESS 10-Stakeholder Engagement and Information Disclosure	Administrative Code	Proposed measures
<ol style="list-style-type: none"> <li>1. The formal or informal grievance mechanism.</li> <li>2. The mechanism will also allow for anonymous complaints to be raised and addressed.</li> <li>3. The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive.</li> </ol>	<ol style="list-style-type: none"> <li>1. The formal mechanism only.</li> <li>2. The anonymous or submitted petitions without indicating the petitioner's postal or e-mail address are not examined.</li> <li>3. No different approach depending on type of grievance or for different type of people.</li> </ol>	<p>To establish, publicize, maintain, and operate an accessible grievance mechanism according to ESS 10.</p> <p>To receive and facilitate resolution of concerns and grievances in relation to the Project, including anonymous grievances and SEA/SH complaints.</p>

### 1.2. Purpose and Objectives

This Grievance Redress Mechanism (GRM) is developed in accordance with the World Bank’s Environmental and Social Standard 10 and considering the national legislation requirements.

**The purpose of this (GRM) is to provide a feedback mechanism to all Project’s stakeholders in order to ensure the two-way communication between the Project’s and subprojects’ implementation teams and external stakeholders during all Project’s implementation stages.** This mechanism represents an instrument for avoidance and mitigation of some potential risks and impacts through the involvement of the stakeholders in the Project implementation process.

The objectives of the GRM are the following:

- To ensure that grievances from stakeholders are well responded and managed in a transparent and timely manner;
- To establish mechanisms to respond to grievances with understanding, transparency, and appropriate procedures;
- To develop a grievance procedure that is accessible, transparent and efficient for the stakeholders;
- To facilitate an effective dialogue and channels of communication openly;
- To manage negative expectations and / or perceptions;
- To improve project’s social performance by evaluating grievances as a basis in taking corrective or preventive action or in developing responsive initiatives.

### 1.3. Application

This Grievance Redress Mechanism provides guidance to Project Management Team (PMT), to subprojects’ management teams and to the Contractors on receiving, registering, assessing, resolving, and reporting the grievances received related to Project implementation.

The GRM will be managed by PMT during implementation of all Project’s components, including the receipt and recording, examination, resolution, monitoring and reporting.

Under Component 2 – Improving the Labor Market Orientation through Targeted Interventions, the Universities and Pedagogical Colleges are responsible for the implementation of their selected subprojects financed under this component and the institutions directly implement and supervise



all stages of subprojects implementation, including the procurement, contracts implementations, monitoring and reporting.

Considering the mentioned above, during Component 2 implementation, this GRM will be operated at two levels:

#### **I. Subproject level, including:**

- **Site level** managed by Contractors that carried out the rehabilitation and construction works under Component 2 of the Project. The Contractor will receive the grievances related to rehabilitation/construction works only and will solve them at site level with information of subproject management. The grievances related to other aspects of subproject or Project implementation received by Contractor will be redirected to subproject management team.
- **Institutional level** of Universities and Pedagogical Colleges management by appointed subproject management team. The subprojects management teams are responsible for the monitoring of the grievances' resolution by Contractors and resolution of the grievances received directly by subproject management or by the management of university or college related to MHEP/subproject implementation. The grievances (suggestions, requests, questions etc.) can be addresses by all stakeholders, including but not limited to: teachers, students, parents, community, labor market representatives etc. The subproject management team is a focal point at subproject level and monitor the resolution of all grievances received regarding the MHEP / subproject implementation keeping a grievances unique tracking register. Additionally, the subproject management team will include additional channels for two-way communication related to Project implementation and Project's activities with the teachers and other staff. The subproject management team can redirect the grievances to PMT if additional support or guidance is required in solving a grievance.

#### **II. Project level.**

This level will address the grievances received by Ministry of Education and Research (MoER) and PMT. The PMT keep the Project's grievances unique tracking register based on submitted reports by subproject management teams.

### **2. General Provisions**

1. The parties of this mechanism consist of MHEP's coordinator, social and environmental, and stakeholder engagement specialists from PMT, the GRM focal point person appointed by subprojects' management team and the GRM focal point person appointed from Contractors side (Contractor carried out the construction / rehabilitation works under Project Component 2).
2. The PMT and subprojects' management teams will appoint a GRM focal point person responsible for the GRM operation.
3. Grievance handling process is carried out with the principles of equality, openness, convenience, accuracy, and participation.
4. Grievances can arise from stakeholders who may include students and teachers, local government (district and town), the potential bidders and consultants, the workers involved in the Project implementation, NGOs, and residents / community etc.
5. Stakeholders who submit grievances / complaints are called complainants or applicants (depending on the grievance category and type).
6. The complainant can submit a grievance / complaint on behalf of the complainant themselves or to represent someone.

7. The confidentiality of the complainant's / applicants data is protected by the Parties in accordance with the provisions of the Law of the Republic of Moldova No. 133 of 08-07-2011 regarding the protection of personal data.
8. The complainants or applicants can submit the grievances anonymously, about which fact they will be informed preventively, including how the answers to anonymous grievances will be provided as part of the information and engagement activities, according to World Bank's ESS 10.
9. Each grievance / complaint must be resolved no later than 15 (fifteen) working days starting from the date the grievance / complaint is received, except the procurement related complaints that are examined and solved according to the Procurement Regulation (<https://ppfdocuments.azureedge.net/083b3f94-a932-4395-a410-834f8bc14f8c.pdf>) and the cases when additional time is needed and the time for examination and taking corrective actions can be extended, with the appropriate information of the applicant/complainant.
10. Complainant can take legal action in the process of resolving grievances / complaints.
11. Grievance handling recapitulation reports are provided monthly by subprojects' management teams to the PMT, and semiannually by PMT to World Bank.

### **3. Grievances Categories and Types**

Considering the MHEP implementation stages and planned activities, the Grievances can be categorized into several categories as follows:

**Category 1** – related to general implementation process of the Project or subproject, including correctness in the implementation process, lack of information, transparency;

**Category 2** – related to environmental and social risks (including gender-based-violence and SH/SEA) and impacts or mitigation measures;

**Category 3** – related to labor risks and conditions, including health and safety aspects, construction impacts, works accidents;

**Category 4** – related to the misuse of funds/lack of transparency, or other financial management concerns;

**Category 5** – related to developed/modernized curricula, new study programs and other related guides and documents under the Project;

**Category 6** – related to consultation and engagement process during the Project implementation;

**Category 5** – other.

Considering the definition of the “Grievances” provided in the Glossary of Key Terms above, the following types of the grievances will be differentiated in the process of management and monitoring of the grievances:

- **Complaints:** an issue, concern, problem, dissatisfaction /disagreement or claim (perceived or actual);
- **Request for information and questions:** request for clarifications or request for additional information on Project's activities or implementation, questions/queries on Project's activities;

- **Suggestions and Proposals:** any suggestions or proposals related to Project implementation improvement or implementation of the specific activities of the Project.

*The lists of categories and types of grievances can be completed or modified in the case of reception of other categories of grievances. The established categories and types will be considered to keep the grievance tracking register the template is attached as an Annex4 to this document.*

## 4. Grievances Redress Process

Grievance redress process is divided into 3 phases: the grievance submission and recording phase, the assessment and examination phase, and the grievance resolution and reporting phase. All these phases are described below.

### 4.1. The Grievances Submission and Recording

#### 4.1.1. The Grievances Submission and Recording at Project Level

1. Complainant can submit the grievances at Project level through several channels as follows:
  - Online using the web site of the Ministry of Education and Research (MoER) <https://mecc.gov.md/ro/petitii-online>;
  - Via email: [mhep@mec.gov.md](mailto:mhep@mec.gov.md); [mecc@mecc.gov.md](mailto:mecc@mecc.gov.md);
  - Via phone: +373 (0) 22 23 25 02; +373 (0) 22 22 76 20;
  - In person: 180, Stefan cel Mare si Sfant blvd, et. 13, office 1313;  
1, Grand National Assembly Square, Government House, MD-2033.
  - Verbally: during meeting, consultation or other information and engagement activities. The grievances submitted verbally will be mentioned in the minutes of meetings and recorder as mentioned below in the following GRM.
  - For the Project's workers and anonymous grievances can be used the phone: [+37368055297](tel:+37368055297).

*A grievance submission form is attached as Annex 1. The proposed submission form is an optional form for the applicant to submit grievances in person or anonymously. Grievances sent in any form will be accepted and examined.*

2. The recipient of the grievance fills out the Grievance Record Form (Annex 2) when the grievance is received.  
If the grievance goes to someone other than the appointed persons by PMT, then the recipient forwards the grievance to the responsible persons for completion of the grievance record form and to be entered into the Grievances Tracking Register.
3. Record grievance in grievance form and log in the tracking register within **one day** from grievance receipt.
4. Inform the Project's management / coordinator on the received grievance and proposed solutions and necessary persons to be involved within **two days** from the grievance reception. Agree with the coordinator on proposed persons to be involved in the assessment and proposed actions.
5. The PMT shall acknowledge receipt of any grievance as soon as possible, but up to **five days** from the date it was submitted and shall inform the complainant about the timeframe

in which a response can be expected. A Grievance Receipt Form (Annex 3) can optionally be used. For the procurement related complaints, the acknowledgment receipt will be submitted within the terms provided by Procurement Regulation.

6. The resolution process of the grievance will start after the proper recording of the grievance and the coordination of actions/ measures to be taken to resolve the grievance between all involved or to be involved PMT's members.
7. The grievance recording procedures and terms are shown in the diagram below.



**Figure 1: Grievances recording procedure at Project level**

#### *4.1.2. The Grievances Submission and Recording at Subproject Level*

1. Every subproject management team and Contractor establishes and provides to all stakeholder the contact data for the grievances' submission. The contact data can include and email address, a telephone number that can be used for submission of some grievances via Viber, WhatsApp, using of social media for grievances submission or other already used method under institution to receive feedback from students, teachers, parents etc. A dedicated channels will be established for the teachers and other staff of institutions.
2. A dedicated telephone number and a suggestions box to be installed in the institutions is recommended to be used for the anonymous grievances, the grievances related to Sexual Assault/Sexual Harassment (SA/SH) and Gender-Based Violence (GBV).
3. The verbally submitted grievances during the meetings, public consultation or other engagement activities will be mentioned in minutes of meeting and be recorded in the record form. The minutes will include the answer provided or the agreed timeframe and channels for answering.

4. A grievance submission form is attached as Annex 1. The proposed submission form is an optional form for the applicant to submit grievances in person or anonymously. Grievances sent in any form will be accepted and examined.
5. The appointed person by subproject management team fills out the Grievance Record Form (Annex 2) when the grievance is received. The Contractor can record the grievance in the own form and register.  
If the grievance goes to someone other than the appointed persons by subproject management and Contractor, then the recipient forwards the grievance to the responsible persons for completion of the grievance record form and to be entered into the Grievances Tracking Register.
6. The sample of grievance submission form and grievance record form shall be available in all organized meetings, consultation or information and engagement activities related to Project/subproject implementation.
7. Record grievance in grievance form and log in the tracking register within **one day** from grievance receipt
8. Inform the subproject manager on the received grievance and proposed solutions and necessary persons to be involved within **two days** from the grievance reception. Agree with the manager on proposed persons to be involved in the assessment and proposed actions.
9. The subproject management team shall acknowledge receipt of any grievance as soon as possible, but up to five days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected. A Grievance Receipt Form (Annex 3) can be used, and a copy will be provided to the complainant. For the procurement related complaints, the acknowledge receipt will be submitted within the terms provided by Procurement Regulation. **This provision is not applicable for the anonymous grievances.**
10. Most likely the Contractor will receive the grievances at the site level either verbally or by phone, it will not be relevant to confirm the receipt of the grievance. He will focus directly on solving the problem as soon as possible at site level, informing the subproject manager.
11. The steps to be realized by universities and pedagogical colleges (institutions) and contractors after reception of a grievance are presented in the diagram below.

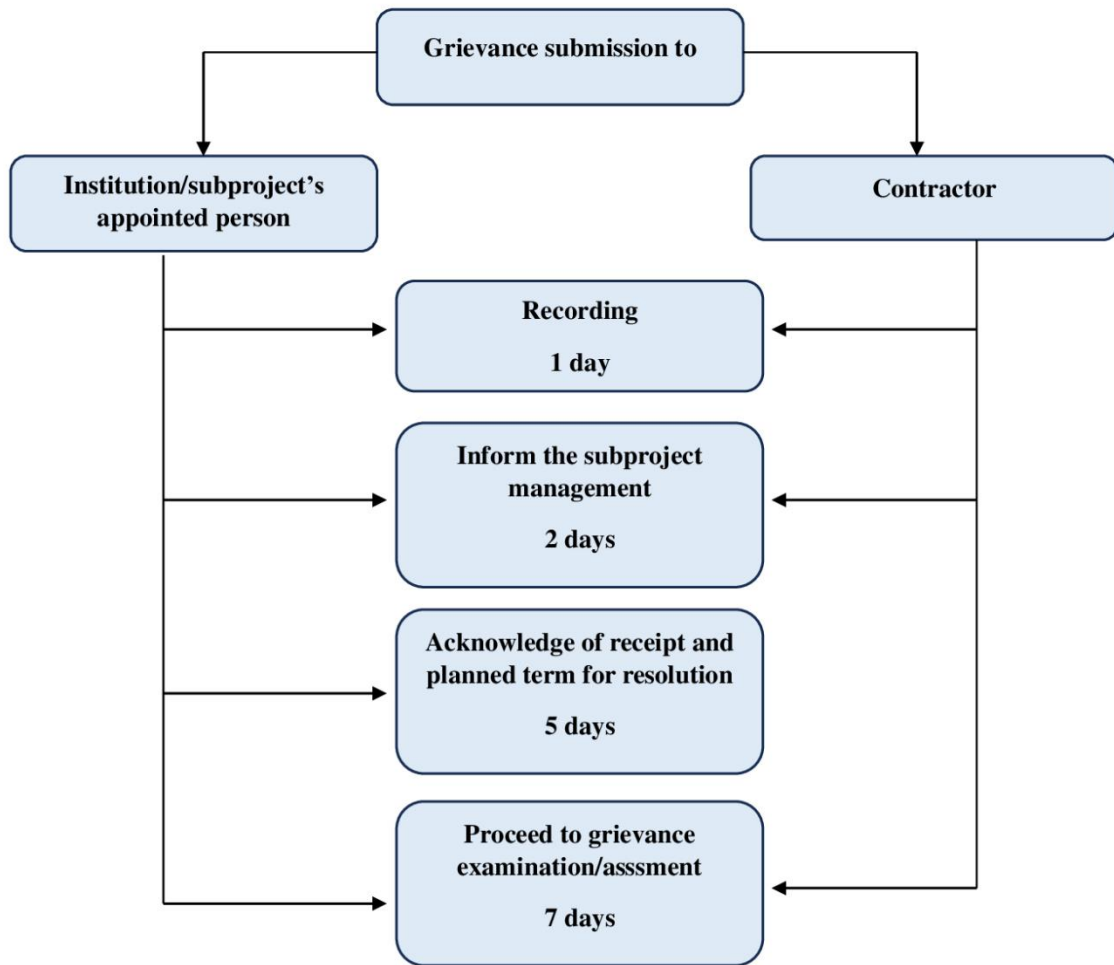


Figure 2: Grievances recording procedure at subproject level

#### 4.2. The Grievances Assessment and Examination

The following steps shall be performed in a timely manner to avoid delaying resolution of a grievance that need the assessment and examination:

1. Obtain as much information as possible from the person who received the grievance, as well as from the complainant to gain a first-hand understanding of the grievance.
2. Undertake a site visit, if required, to clarify the parties and issues involved. Gather the views of other stakeholders.
3. Determine whether the grievance is eligible.
  - Eligible grievances include all those that are directly or indirectly related to MHEP and that fall within the scope of the Grievance Redress Mechanism as outlined above.
  - Ineligible grievances may include those that are clearly not related to MHEP or its contractors' activities, whose issues fall outside the scope of the Grievance Redress Mechanism.
4. If the grievance is deemed ineligible it can be rejected however a full explanation as to the reasons for this must be given to the complainant and recorded in the Grievance Tracking Register.

5. Inform the complainant / applicant of the expected timeframe for resolution of the grievance or answer provision to the requested information.
6. If necessary and applicable, the assessment and investigation of the grievance through discussion with the relevant stakeholders, site visits or other measures in no more than **seven days** after coordinator / manager information and agreement on proposed actions.
7. **An answer will be given as soon as possible to the type of grievances / requests that do not require lengthy examination or identification of additional information and solutions, such as questions, suggestions, proposals, etc..** Students, parents, teachers and other staff will be informed through the existing information channels in the institution about the possibility to address any type of requests, grievances, proposals and complaints related to the Project and specific financed activities for the institution.

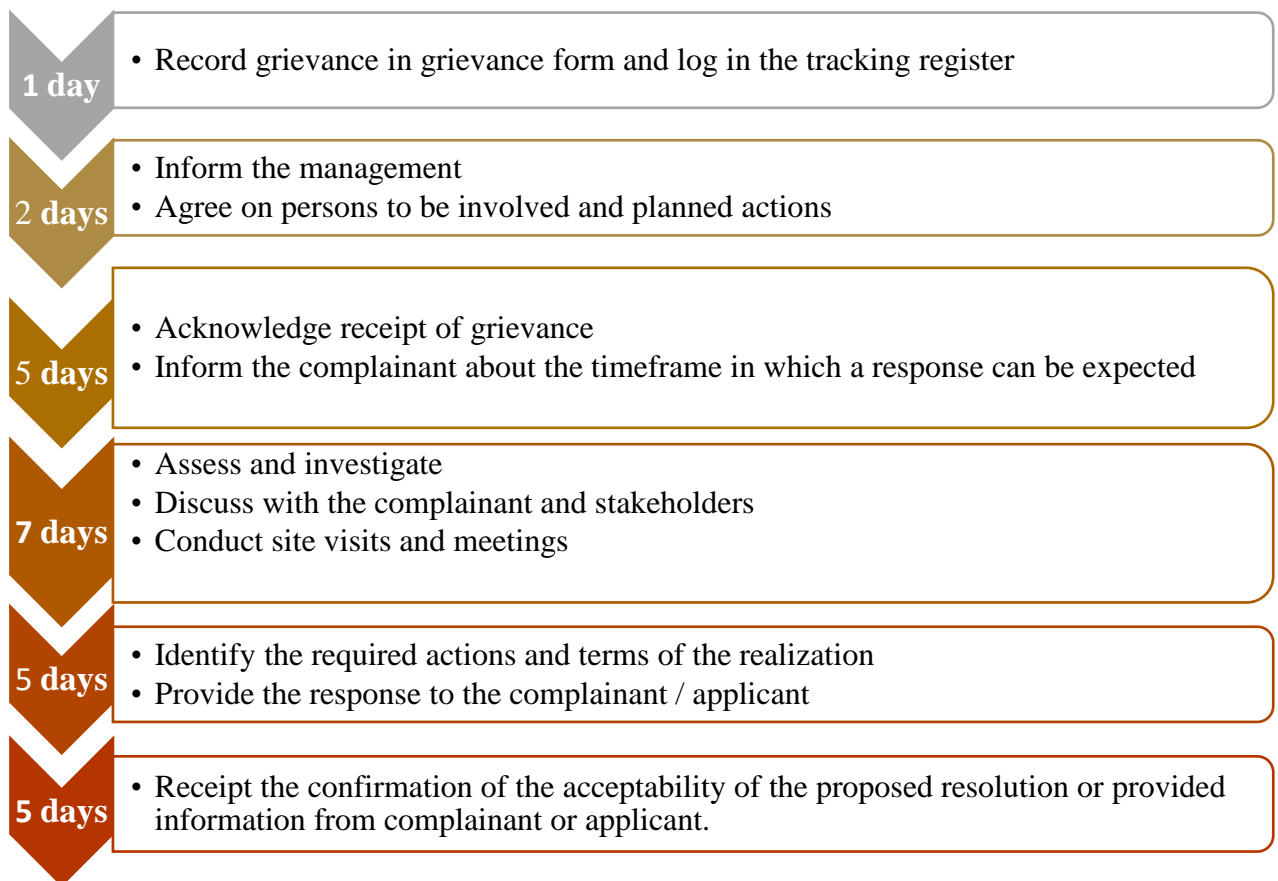
### *4.3. The Grievances Resolution*

1. All grievances shall be dealt with on a case-by-case basis. However, it will be determined if it is necessary and applicable to conduct further discussions with complainants / applicants and community members that seek to jointly identify and select measures for grievance settlement.
2. An incident investigation team may be tasked with seeking resolution to the grievance. This may entail a dialog or series of dialogs between affected parties to find a solution to the grievance. Alternatively, it may entail investigating the underlying cause of the grievance and action any changes required to internal systems to prevent a recurrence of a similar grievance.
3. The anonymous grievances will be examined based on provided information.
4. The grievances related to SA/SH and GBV cases can be examined in collaboration with the existing in country GBV service providers/ NGOs. The list of GBV service providers/ NGOs is available on [www.stopviolenta.md](https://stopviolenta.md)<https://stopviolenta.md/index.php?do=feedback>. The response and guidance on these grievances will be submitted strictly at the specified by complaint contact data.
5. Identification of the required actions and terms of the realization. Provision of the response to the complainant / applicant within **five days** after grievance assessment / investigation completion, including, if necessary, the notification on additional time and resources required to resolve the grievance. For every proposed solution / action will be estimated a time for execution.
6. The notification related to anonymous grievances and answers to anonymous grievances can be placed on information boards, to be placed on institutions' website or using social media. The information on the ways in which is provided the answers to anonymous grievances will be provided at as early as possible in the implementation of the Project/subproject.
7. The general information on available support measures and institution can be placed on information board and web site regarding the SA/SH and GBV, such as the SEA/SH green-line 0 8008 8008 for women and girls suffering from domestic abuse, victims of trafficking in human beings, victims of sexual exploitation.
8. The submitted response to the grievance will include the request to the complainant / applicant to confirm the acceptability of the provided information and proposed solutions / actions within 5 days after receipt of the response. If the confirmation is not sent, it is considered tacit approval of those proposed and provided in the answer.
9. The monitoring of the realization of the proposed solutions and actions will be carried out by PMT / subprojects management teams according to the established / estimated terms for the realization.
10. The Grievance Tracking Register will be completed accordingly.

11. The feedback received from the stakeholders in the direct interaction events, such as workshops, round tables and survey will be included in the minutes or in the developed reports by institutions or contracted consultants. The results of all consultations / engagement activities will be submitted to the PMT.
12. The institutions can involve the contracted consultants for conducting the trainings, for curricula modernization and new programs development in the two-way communication with the teachers, students and labor market. These specific responsibilities can be considered during the Terms of Reference preparation, contract negotiation or to be agreed upon contract implementation.

Some of the actions in the grievances examination process can be carried out simultaneously, such as information of the complainant on grievance receipt and grievance assessment and examination, but the total deadline for providing an answer will not exceed 15 working days. If more time for the examination is needed, the applicant will be informed about this with the appropriate argumentation of this necessity.

The summary of the grievance resolution process and deadlines is included in the figure below.



*The time frame proposed above is applicable for the grievances that needs examination and identification of actions and corrective measures to be taken. The answers to some questions or suggestions and requested information will be provided in the shortest possible time to ensure an effective and proactive two-way communication process with the Project's stakeholders.*



## **5. Monitoring and Reporting**

PMT will monitor grievances routinely as part of the broader management of the Project. This entails good record keeping of the grievances raised throughout the life of the Project. On receipt of grievances, electronic notification to management must be distributed.

The subprojects' management teams will provide biweekly to PMT the internal reports on GRM operation status and copy of the tracking register.

The stakeholder engagement consultant will compile the information provided by subprojects management teams and will develop quarterly reports to Project's management and semiannually reports to the World Bank.

These grievance reports will be developed based on Grievance Recording, Grievance Tracking Registers (Annex 2 and Annexes 4 and 5) and results of other consultation and engagement activities and will include:

- The number of grievances logged in the proceeding period by level (at project or subproject level) and category and type.
- The number of the solved grievances, including the answers provided to the questions, requests for information, suggestions and proposals and other received feedback through the Project's GRM.
- The number of the grievances under examination.
- The number of the grievances with the accepted resolution.
- The number of the grievances with the partially accepted resolution.
- The number of the grievances with the not accepted / rejected resolution.
- The most frequent questions and requests/suggestion/proposals or feedback.
- The planned or carried out actions and measures based on received feedback, such as for example: informational materials development on specific subjects, additional information provided using the social media channels and the internal groups on Viber or WhatsApp, mass emailing, groups meetings or workshop with a specific stakeholders group etc.

These reports and other records of engagement activities will be made available for external review if required. An appropriate grievance report should be part of the semiannually reports on stakeholders' engagement process.

The semiannual reports will be made available to the public. A hard copy will be located at the PMT office, and an electronic copy will be made available online on MoER's website and universities and colleges websites.

This GRM can be revised and updated based on the proposals, comments and suggestions received both from the participants in the GRM operation and Project's beneficiaries and stakeholders.

The feedback provided by the stakeholders during the engagement activities (workshops, consultations, meetings etc.) shall properly documented in the minutes of meetings or reports on consultation conducted, which will include the question, suggestion and proposals addressed by participants and the answers offered by organizer/moderators. In case of some proposals or suggestions shall be mentioned if they were accepted or the reason for their non-acceptance. The results of engagement activities shall be provided to the participants in dependence of type of event. The results of consultation/discussion can be submitted directly to the participants if the contact data is provided or can be placed on the web site, about which the participants will be informed during the event.

A well-documented process of stakeholder engagement, including the grievances management will provide a strong base for some modification in the Project implementation or update of the Project's procedures and documents in accordance with the currently Project's and stakeholders needs. The grade of satisfaction of the Project's beneficiaries is a key indicator in successful implementation of the Project.

The monitoring and reported data will be used to establish the necessity to updated or modified this GRM, in close collaboration with all involved institutions.

## **6. Information Disclosure**

The information on the Grievance Redress Mechanism both at Project and subprojects levels will be provided in all events and meetings with the Project's stakeholders. A simplified guide will be prepared for easier use by institutions, which will be placed also on MoER's web site and on the websites of the universities and pedagogical colleges.

The universities and pedagogical colleges will place the information on boards, web sites, social media on the GRM, including data for the grievances' submission, type of grievances (i.e. complaints, requests and suggestions), deadlines for the response submission to the complainant / applicant, the option to submit the grievances anonymously and to view the response on the anonymous grievances on web site and information boards.

The status data on the grievances resolution related to MHEP implementation will be placed semiannually on MoER's website, on websites and information boards of universities and colleges.

**Annex 1: Grievance Submission Form – to be completed by complainant\***

Reference No: \_\_\_\_\_

*Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent. In case of anonymous grievances, the decision will be disclosed and communicated back on the website of the university / college or MoER.*

First Name \_\_\_\_\_

Last Name \_\_\_\_\_

- I wish to raise my grievance anonymously
- I request not to disclose my identity without my consent
- Contact Information

*Please mark how you wish to be contacted (telephone, e-mail).*

- By Telephone: \_\_\_\_\_
- By E-mail \_\_\_\_\_
- I will follow up the resolution at the website as I want to remain anonymous

Preferred Language for communication:     Romanian     Russian     Other (*indicate*)

Description of Incident or Grievance (*What happened? Where did it happen? Who did it happen to? What is the result of the problem? Date of Incident/ Grievance*)

- One-time incident/grievance (date \_\_\_\_\_)
- Happened more than once (how many times? \_\_\_\_\_)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*\*The submission form is an optional form that can be provided to the applicant for submission in person or to be available at information boards for sending grievances anonymously.*

**Annex 2: Grievance Record Form**

<b>GRIEVANCE RECORD FORM</b> <i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>	
Date Grievance Received:	Name of Staff Completing Form:
Grievance Received (check <input checked="" type="checkbox"/> ): <input type="checkbox"/> PMT <input type="checkbox"/> Subproject <input type="checkbox"/> Contractor	
Mode of Filing Inquiry or Grievance (check <input checked="" type="checkbox"/> ): <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone <input type="checkbox"/> Website <input type="checkbox"/> Verbal <input type="checkbox"/> Meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____	
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>	
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>	
Location where grievance/problem occurred [write in]	
Town, Village, District	Institution
Brief Description of Grievance or Inquiry: <i>Type – complaint; request for information; suggestion / proposals</i>  (Provide as much detail and facts as possible)	
Category 1	Related to general implementation process of the Project or subproject, including correctness in the implementation process, lack of information, transparency;
Category 2	Related to environmental and social risks (including gender-based-biolence) and impacts or mitigation measures;
Category 3	Related to labor risks and conditions, including health and safety aspects, construction impacts, works accidents;
Category 4	Related to the misuse of funds/lack of transparency, or other financial management concerns.
Category 5	Related to developed curricula, programs and other related guides and documents under the Project;
Category 6	Related to consultation and engagement process during the Project implementation;
Category 5	Other
Who should handle and follow up on the grievance:	
Progress in resolving the grievance (e.g. answered, being resolved, settled):	

**Annex 3: Grievance Receipt Form - to be used to acknowledge grievances submitted\***

<b>GRIEVANCE RECEIPT FORM</b>	
Grievance Number:	Date Submitted:
Name:	
Address and Contact Details	
Grievance Received By:	
Name of Grievance Responsible:	
Contact details of Grievance Responsible	Telephone: Email: Address:

*\* Not applicable for anonymous grievances*

**Annex 4: Grievance Tracking Register at Project Level**

SN	Current Status	Details of Complainant									Resolution		
		Grievance received <i>(at Subproject level / at Project level)</i>	Submission method <i>(email, poste, phone, box, within the meetings)</i>	Category *	Type <i>(complaint, request, suggestion)</i>	Name /anonymous	Receipt Date – Planned answer Date	Description of the Issue	Persons to be involved	Method to Contact and contact details	Action Proposed	Action Taken	Responsible
	<b>under examination</b> – at Subproject level or Project level <b>answer provided</b> - proposed measures provided <b>closed</b> - corrective action taken												
001													
002													
003													
004													
005													
006													
007													
008													

\*

Category		Types	
<b>Category 1</b>	Related to general implementation process of the Project or subproject, including correctness in the implementation process, lack of information, transparency;	<b>Complaints:</b>	an issue, concern, problem, dissatisfaction /disagreement or claim (perceived or actual).
<b>Category 2</b>	Related to environmental and social risks (including gender-based-biolence) and impacts or mitigation measures;	<b>Requests for information and questions:</b>	request for clarifications or request for additional information on Project’s activities or implementation, questions/queries on Project’s activities implementation.
<b>Category 3</b>	Related to labor risks and conditions, including health and safety aspects, construction impacts, works accidents;	<b>Suggestions and Proposals:</b>	any suggestions or proposals related to Project implementation improvement or implementation of the specific activities of the Project.
<b>Category 4</b>	Related to the misuse of funds/lack of transparency, or other financial management concerns.		
<b>Category 5</b>	Related to developed curricula, programs and other related guides and documents under the Project.		
<b>Category 6</b>	Related to consultation and engagement process during the Project implementation.		
<b>Category 7</b>	Other		

**Annex 5: Grievance Tracking Register at Subproject Level**

SN	Current Status	Details of Complainant									Resolution		
		Grievance received <i>(by Contractor / subproject management team)</i>	Submission method <i>(email, poste, phone, box, within the meetings)</i>	Category *	Type <i>(complaint, request, suggestion)</i>	Name /anonymous	Receipt Date – Planned answer Date	Description of the Issue	Persons to be involved	Method to Contact and contact details	Action Proposed	Action Taken	Responsible
	<p><b>under examination</b> – by contractor or by subproject management team / requested PMT support</p> <p><b>answer provided</b> – proposed measures provided</p> <p><b>closed</b> – corrective action taken</p>												
001													
002													
003													
004													
005													
006													
007													
008													

\*

Category		Types	
<b>Category 1</b>	Related to general implementation process of the Project or subproject, including correctness in the implementation process, lack of information, transparency;	<b>Complaints:</b>	an issue, concern, problem, dissatisfaction /disagreement or claim (perceived or actual).
<b>Category 2</b>	Related to environmental and social risks (including gender-based-biolence) and impacts or mitigation measures;	<b>Request information and question:</b>	request for clarifications or request for additional information on Project’s activities or implementation, questions/queries on Project’s activities implementation.
<b>Category 3</b>	Related to labor risks and conditions, including health and safety aspects, construction impacts, works accidents;	<b>Suggestions and Proposals:</b>	any suggestions or proposal related to Project implementation improvement or implementation of the specific activities of the Project.
<b>Category 4</b>	Related to the misuse of funds/lack of transparency, or other financial management concerns.		
<b>Category 5</b>	Related to developed curricula, programs and other related guides and documents under the Project.		
<b>Category 6</b>	Related to consultation and engagement process during the Project implementation.		
<b>Category 7</b>	Other		



