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MINISTRY OF EDUCATION, SCIENCE AND TECHNOLOGY
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HIGHER EDUCATION FOR ECONOMIC TRANSFORMATION (HEET) PROJECT (P166415)

GRIEVANCE REDRESS MECHANISM

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TABLE OF CONTENTS

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ACRONYMS/ABBREVIATIONS	iii
DEFINITION OF KEY TERMS	iv
1.0 INTRODUCTION	1
1.1 Background	1
1.2 Objectives of the GRM	2
1.3 Scope of the GRM	2
1.4 Expected Outputs	3
1.5 Principles of the GRM	3
2.0 GRIEVANCES MECHANISM PROCEDURES	4
2.1 Complaints Channels	4
2.2 Project Grievance Committees	4
2.3 Confidentiality and Conflict of Interest	5
2.4 Receipt and Registration of Complaints	6
2.5 Recording/Logging	6
2.6 Sorting/Categorization and Review of Complaint	7
2.7 Notification to the Complainant	8
2.8 Investigation	9
2.9 Response to Complainant	10
2.10 Grievance Disclosure	10
3.0 MANAGEMENT OF THE GRM	11
3.1 Roles and responsibilities of various GRM actors	11
4.0 MONITORING AND REPORTING	12

5.0	APPENDICES	14
5.1	Grievance registration form	14
5.2	Grievance notification/acknowledgement form	15
5.3	Grievance log	16
5.4	Grievance resolution form	18
5.5	Grievance resolution action plan	19

ACRONYMS/ABBREVIATIONS

ESIA	-	Environmental and Social Impact Assessment
GRM	-	Grievance Redress Mechanism
GBV	-	Gender Based Violence
HEET	-	Higher Education for Economic Transformation
HLI	-	Higher Learning Institution
MoCU	-	Moshi Co-operative University
MoEST	-	Ministry of Education, Science and Technology
NEMC	-	National Environmental Management Council
SEA	-	Sexual Exploitation and Abuse
UPIU	-	University Project Implementing Unit
WB	-	World Bank

DEFINITION OF KEY TERMS

Term	Definition
Affected Party(ies)	Stakeholders who are affected by the company or operation, both positively and negatively. Within this it is possible to distinguish between those that are directly and indirectly affected by the company or operation.
Environmental and Social Impact Assessment	Process of evaluating and addressing potential social and environmental impacts resulting from HEET Project and identifying any mitigation or corrective measures that will enable the project to meet the requirements of the World Bank Operational Standards, NEMC Performance Standards and applicable National laws and regulations.
Grievance	An issue, concern, problem, or claim (perceived or actual) that a project stakeholder wants to address and resolve.
Grievance Database	System for logging and monitoring all grievances received, including any records of communication/consultation and details of grievance settlement.
Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to lenders, employees, communities, industry, governments, and students.
Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between MoCU and stakeholders (two-way communication) over the life of a project that are designated to promote transparent; accountable,

	positive, and mutually beneficial working relationships.
Vulnerable Groups	Individuals or groups within the project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's ethnicity, gender, language, religion, political views, dependence on natural resources, sickness or disability or other factors.

1.0 INTRODUCTION

1.1 Background

The Government of the United Republic of Tanzania has received funds from the World Bank under the Higher Education for Economic Transformation (HEET) Project that will be implemented for five years (2021-2026). The Project is implemented under the Ministry of Education, Science and Technology (MoEST) whereby several Higher Learning Institutions (HLIs) will be the beneficiaries. The overall project development objective is to strengthen the learning environments and labour market orientation of programs in priority disciplines of the HLIs. To achieve the objective, priority areas will include construction and/ rehabilitation of infrastructure, upgrading learning resources and equipment, updating curriculum, and introducing innovative pedagogical methodologies, promoting applied research and innovation capacity as well as building functional linkages with private sector/industry. Other areas include development of online learning platforms and digital technology applications, establishment of state-of-the-art ICT infrastructure, promoting self-generated income, and building capacity of academic staff and university leadership. Moshi Co-operative University (MoCU) is among the HLIs that will benefit from this project. The project contributes to the goal of the Government of Tanzania's National Five-Year Development Plan III (2021/22-2025/26) and realisation of National Development Vision (2025) through provision of quality education, training, research, innovation, outreach, and community services.

To manage any complaints or grievances from project stakeholders and beneficiaries, the project has established a Grievance Redress Mechanism (GRM). The GRM was established to ensure that complaints are addressed as early as possible to avoid delaying implementation of the planned activities. The GRM will also assist the University Project Implementing Unit (UPIU) to

ensure that deliberate processes and procedures are put in place to capture, assess, and respond to concerns from all project stakeholders who are directly or indirectly affected by the project.

1.2 Objectives of the GRM

The main objective of the GRM is to provide important feedback and learning mechanisms that can assist improving project impacts and minimise the risks that could unintentionally affect project beneficiaries. Specifically, it aims to:

- (a) ensure transparency and accountability to all stakeholders throughout implementation of project;
- (b) provide channels for project stakeholders to give feedback on project activities;
- (c) address complaints and grievances and provides a mechanism that allows for the conflict resolutions of issues affecting the project and wider community;
- (d) resolve any emerging environmental and social grievances in project areas, and;
- (e) promote relations between the UPIU and other project stakeholders.

1.3 Scope of the GRM

The GRM is designed to improve project outcomes by creating a mechanism for dispute resolution during project implementation. It also serves as the tool for creating public awareness about the project and providing the UPIU with the practical suggestions and feedback during project implementation and operation. The GRM will be available for all project stakeholders including University staff, students, the surrounding communities; the Ministry of Education, Science and Technology, World Bank and other

individuals who will be directly or indirectly, positively, or negatively affected by the project.

1.4 Expected Outputs

The GRM will lead to:

- (a) Timely identification of problems and adoption of cost-effective remedial actions;
- (b) Systemic identification of issues related to implementation capacity and processes;
- (c) Timely achievement of project objectives, and;
- (d) Greater accountability to stakeholders.

1.5 Principles of the GRM

To ensure effective resolution of stakeholder grievances, MoCU shall uphold the following principles:

- (i) Transparency and accountability: The entire GRM process should be done out of public interest.
- (ii) Accessibility: The GRM should be accessible to everyone and at any time.
- (iii) Rights compatibility: The outcomes of the mechanism shall be consistent with the World Bank and national standards. It should also not restrict access to other redress mechanisms.
- (iv) Predictability: There shall be a clear timeframe for the resolution of complaints.
- (v) Feedback: There shall be a known feedback mechanism.
- (vi) Equitability and fairness: Aggrieved parties shall have access to relevant sources of information relative to their complaint. Likewise, all the procedures therein shall be widely perceived as unbiased regarding access of information and meaningful public participation.

2.0 GRIEVANCES MECHANISM PROCEDURES

2.1 Complaints Channels

The preferable channels for reporting grievances shall be communicated to stakeholders as part of community engagement. The channels include:

- (i) Email address: vc@mocu.ac.tz; dvcpfa@mocu.ac.tz and dvcarc@mocu.ac.tz
- (ii) Telephone number: +255 272 751 833;
- (iii) Platform: Portal, social media accessed through the University website [\[www.mocu.ac.tz\]](http://www.mocu.ac.tz)
- (iv) Suggestion boxes located at points where the project activities are implemented. e.g., Moshi and KICoB Administration blocks, and project site areas.
- (v) Through Community Liaison Officers located in all project site offices.
- (vi) Letters to be sent through the following address:
Vice Chancellor,
Moshi Co-operative University,
P.O. Box 474,
06 Sokoine Road,
25121 Mfumuni, Moshi.
- (vii) Verbal or written complaints availed directly or through project meetings. In this aspect, project stakeholders shall provide verbal feedback or complaint and the project staff responsible for GRM will log the complaint on their behalf through Grievance registration form, and it will be processed through the same channels.

2.2 Project Grievance Committees

The University shall establish a project grievance committee comprising of five members as follows:

- (a) One appointed member from Management who will be Chairperson,
- (b) One appointed member from administrative staff who will be Secretary,
- (c) One appointed member from academic staff,
- (d) One representative from student's organisation, and
- (e) One neutral member appointed by the Vice Chancellor.

The committee shall contain an equitable proportion of Gender. There shall be no charge for making a complaint or conveying comments or suggestions. The project shall ensure flexibility in the channels available and make sure that different contact points are available for a person to make a verbal complaint, and if the complaints addressed to the wrong person or entity are redirected to right provided channels. The investigation of the complaints shall take seven (7) to 14 working days. If more time is needed, then the complainant will be notified with an explanation of when she/he can expect the resolution.

2.3 Confidentiality and Conflict of Interest

Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to make a complaint have been established and conflicts of interest will be avoided. Specific procedures for Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA) including confidential reporting with safe and ethical documentation of GBV/SEA cases will be handled by the neutral person/committee designed outside the GRM system.

2.4 Receipt and Registration of Complaints

The selected person receiving the complaint will complete a grievance form (Appendix 1) or make the form available to the complainant to fill out directly and submit to the respective addresses mentioned in section 2.1. The complaints will be collected/received and compiled by the selected grievance focal person in the two campuses where the project will be implemented. It is also important to note that:

- (a) The complaints will be received/collected throughout the project life and during operation,
- (b) When a complaint or grievance is presented, the complaint must be noted and recorded in writing using a Grievance Registration Form (Appendix 1). The Grievance Focal Person must read and explain what has been recorded to the complainant to confirm the complaint or grievance has been recorded properly,
- (c) In case the grievance has been received by someone other than the Grievance Focal Person, all forms must be handed over to the Grievance Focal Person within 24 hours, and;
- (d) Each complainant must receive a Grievance Acknowledgement Form (Appendix 2).

2.5 Recording/Logging

Procedures for recording/logging grievances shall be as follows:

- (a) Once the complaint has been categorized, the Grievance Focal Person shall log/record the details regarding the complaint into the established recording system in form of hard or soft copy. GRM files should be stored in a secured place.
- (b) Once a complaint has been logged and sorted, the GRM focal point/person shall refer the case to the Grievance Redress Committee and directs the Committee to investigate the complaint within timeframe

which the complaint should be resolved and agreed on the course of action.

Once the investigation process has been established, the person responsible for managing the GRM will record and enters data and information into the established grievance log (Appendix 3).

2.6 Sorting/Categorization and Review of Complaint

After compilation, the respective GRM focal person (s) will be responsible for sorting and give feedback/acknowledgement to the complainant. Table 1 gives examples of categories that could be used to sort the complaints:

Table 1: Categories for sorting complaints

No.	Sorting
Category 1	Grievances regarding violations of policies, guidelines, and procedures
Category 2	Grievances regarding contract violations
Category 3	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
Category 4	Grievances regarding abuse of power/ intervention of project by government officials
Category 5	Grievances regarding project implementing unit staff performance
Category 6	Inappropriate reporting of project implemented activities
Category 7	Suggestions
Category 8	Appreciations
Category 9	Unfair Labour distribution
Category 10	Labour disputes

The grievance focal person shall determine whether the grievance is eligible or ineligible before further investigation. Eligible grievances include all those

that are directly or indirectly related to HEET Project and that fall within the scope of the Grievance Redress Mechanism as explained in section 1.3. Ineligible Complaints may include those that are clearly not related to HEET Project or its contractors' activities, whose issues fall outside the scope of the Grievance Redress Mechanism.

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 Database. If the grievance is eligible, determine its severity level using the significance criteria in Table 1. This will help to determine whether the grievance can be resolved immediately or requires further investigation and whether senior management will need to be informed of the grievance.

2.7 Notification to the Complainant

Generally, MoCU will proactively inform affected communities and the wider stakeholder group of the details of the Grievance Redress Mechanism. This will include information about where people can go and who they can talk to if they have a grievance. This information shall be widely and regularly publicised, throughout the duration of the public consultation exercise and through meetings and the distribution of fliers. The information provided will be in a format and language that are readily understandable by the local population and/or orally during routine stakeholder engagement.

Specifically, notification to the complainant will be done on several ways as follows:

- (a) If the complainant is known, the Grievance Focal Person shall communicate the course of action to her/him by letter, Grievance

Acknowledgement Form, phone and/or email, within established timeframe since receipt of the grievance, and;

- (b) Where the complainant's address is available, notification should be provided in writing using predetermined Notification Form (Appendix 2).

2.8 Investigation

All grievances shall be dealt with on a case-by-case basis. Cases with contractual basis will be dealt as per the contract(s). However, all will require further communication with complainants and other parties that seek to jointly identify and select measures for grievance settlement. This will ensure greater involvement of the aggrieved parties. During investigation, the following steps shall be considered:

- (a) GRM Committee shall appoint person (s) or a team to investigate complaints.
- (b) The person/team responsible for investigating the complaint will gather facts to generate a clear picture of the circumstances surrounding the grievance. Verification normally includes:
 - (i) site visits,
 - (ii) review of documents,
 - (iii) a meeting with the complainant (if known and willing to engage); and
 - (iv) a meeting with those who could resolve the issue including formal and informal officials.
- (c) The results of the verification and the proposed response to the complainant will be presented for consideration to the Grievance Committee.

Once the decision has been made on the course of action and on the response to be provided to the complainant, the Grievance Focal Person shall

describe the actions to be taken in the established grievance form (Appendix 4) and submit it to the GRM Committee.

2.9 Response to Complainant

The Grievance Focal Person shall communicate the proposed action to complainant via letter, email, verbally, as received. The complainant shall also be informed on how she/he can appeal the action decided in the initial case.

The Grievance Focal Person will request feedback from the complainant as to whether she/he finds the action(s) satisfactory, and this will be recorded along with the details of the complaint and the response taken using Grievance Resolution Form (Appendix 4).

2.10 Grievance Disclosure

Once the grievance is resolved, the complaint and the actions taken will be disclosed to relevant authorities and the identity of the complainant will remain confidential.

In case where the stakeholder is not satisfied with actions taken, the grievance will either:

- (a) Be reported to the University management and a decision will be taken either to implement supplementary actions or to consider initiating an appeal process; or
- (b) The GRM committee will approach a neutral or third party to assist in mediating and resolving the grievance. This third party should be neutral, well-respected, and agreed upon by both MoCU and the affected parties. These may include legal advisors, local or international respected individual or technical experts; or

(c) In cases where further mediation is necessary, appropriate government involvement will be requested.

3.0 MANAGEMENT OF THE GRM

The overall management of GRM for HEET project is under the Vice Chancellor who will be assisted by the HEET Project Coordinator. However, in each area where the HEET project is implemented, there will be designated focal person to handle the submitted complaints. The designated person will be called GRM Focal Person for easy recognition during grievance occurrence and handling. In addition, there will be GRM Committee appointed by the Vice Chancellor responsible for mediating and resolving all cases submitted to them by the GRM Focal Person.

3.1 Roles and responsibilities of various GRM Actors

(a) Vice Chancellor

- (i) Ensures that this Grievance Redress Mechanism procedure is applied through all levels that are undertaking activities related to the HEET project,
- (ii) Provides the resources necessary for the resolution of grievances,
- (iii) Applies necessary controls to minimise risks that could result in stakeholder grievances, and
- (iv) Contributes to the resolution and sign off any grievances which have local and international repercussions.

(b) GRM Focal Person

- (i) Serves as the initial point of contact for any grievances,
- (ii) Compiles, sorts, and reviews all grievances that are reported,
- (iii) Consults with the GRM Committee to develop resolutions to grievances,

- (iv) Follows up on all reports,
- (v) Ensures that the GRM procedures are maintained,
- (vi) Maintains the grievance log, and
- (vii) Conducts awareness training internally.

(c) GRM Committee

- (i) Mediate and resolve all complaints submitted to them in liaison with GRM focal persons and investigation team,
- (ii) Appoint investigation team,
- (iii) Approach the independent arbiter when need arises.

(d) HEET Coordination Unit and stakeholders

- (i) Receive and acknowledge any issue, concern, complaint, or grievance from the community, verbally or in writing. They will record the issue and report it to the Grievance focal person in compliance with the Grievance Redress Mechanism procedure;
- (ii) Create awareness to project stakeholders on the GRM, and;
- (iii) Involvement in the investigation of grievances as required depending on the nature and severity of the grievance and as directed by the GRM Committee.

4.0 MONITORING AND REPORTING

The overall routine monitoring and reporting of grievances shall be vested upon University Management as part of the broader management of the Project. This involves good record keeping of complaints raised throughout the life of the implementation and operation of the HEET Project. On receipt of grievances, electronic notification to management must be distributed. Grievance records must be always made available to management.

Monthly internal reports will be compiled by the Grievance Focal Persons in two campuses and distributed to the management team. These grievance reports will include:

- (i) The number of grievances logged in the proceeding period by level and type.
- (ii) The number of stakeholders that have come back after 30 days stating they are not satisfied with the resolution.
- (iii) The number of grievances unresolved by level and type.
- (iv) The number of grievances resolved between MoCU and complainant, without accessing legal or third-party mediators, by level and type.
- (v) The number of grievances of the same or similar issue.
- (vi) University Management's responses to the concerns raised by the various stakeholders.
- (vii) The measures taken to incorporate these responses into project design and implementation.

These reports and other records will be made available for external review if required. A hard copy will be located at the MoCU offices where the project is implemented, and an electronic copy will be made available online through MoCU websites.

5.0 APPENDICES

5.1 Grievance registration form

Appendix 1

Grievance registration form			
Reference No. (for official use)			
Mode of filling inquiry or grievance (Check in <input checked="" type="checkbox"/>):			
In person	Telephone	Email	Phone text message
Website	Letter	Suggestion box	Community meeting
Public consultation	Other		
Name of a person(s) raising grievance: (<i>information is optional and always treated as confidential</i>)			
Sex: Male (<input type="checkbox"/>) Female (<input type="checkbox"/>)			
Project location:			
Address or contact information for person raising grievance: (<i>information is optional and confidential</i>)			
Preferred Language for communication			
Description of Incident or Grievance: What happened? Where did it happen? Who did it? Who was aggrieved? What are the consequences?			
Date of Incident/Grievance			
Frequency of occurrence	(Check in <input 3"="" checked="" type="checkbox/>)</td> </tr> <tr> <td></td> <td colspan="/> <ul style="list-style-type: none"> ● One-time incident/grievance ● Happened more than once (how many times? (.....)) ● On-going (currently experiencing problem) 		
How can this grievance be resolved?			

Additional Comments:

5.2 Grievance notification/acknowledgement form

Appendix 2

Grievance receipt form			
Grievance No.			
Mode of filling inquiry or grievance (Check in <input type="checkbox"/>):			
In person	Telephone	Email	Phone text message
Website	Letter	Suggestion box	Community meeting
Public consultation	Other		
Name of a person(s) raising grievance: (information is optional and always treated as confidential)			
Sex: Male (<input type="checkbox"/>) Female (<input type="checkbox"/>)			
Project location:			
Address or contact information for person raising grievance: (<i>information is optional and confidential</i>)			
Date of grievance received:			
Grievance received by:			
Contact details of GRM Focal Person	Telephone:		
	Email:		
	Address:		
Deadline for response:			

5.3 Grievance log

Appendix 3

Grievance record form			
Grievance No.			
Mode of filling inquiry or grievance (Check in <input type="checkbox"/>):			
In person	Telephone	Email	Phone text message
Website	Letter	Suggestion box	Community meeting
Public consultation	Other		
Name of a person(s) raising grievance: (<i>information is optional and always treated as confidential</i>)			
Sex: Male (<input type="checkbox"/>) Female (<input type="checkbox"/>)			
Project location:			
Address or contact information of person(s) raising grievance: (<i>information is optional and confidential</i>)			
Preferred Language for communication			
Grievance received by:			
Description of Incident or Grievance:			
Nature of grievance:			
Action recommended:			
Responsible person:			
Due date:			
Status of resolution:			
Date of resolution:			
Resolution summary:			

Was the aggrieved person satisfied?	Y () N ()	Comments from GRM Focal Person:	
Grievance closed?	Y () N ()	Grievance resubmitted	Y () N ()

5.4 Grievance resolution form

Appendix 4

Grievance resolution form			
Grievance No.			
Date grievance received:			
Nature of grievance:			
Mode of delivering resolution (Check in $\sqrt{\quad}$):			
Recorded personal communication	Recorded Telephone conversation	Email	Phone text message
Website	Letter		Community meeting
	Other		
Address or contact information for person raising grievance: (<i>information is optional and confidential</i>)			
Name of person delivering resolution:			
Action recommended:			
Resolution summary:			

5.5 Grievance resolution action plan

S/N	Process	Time (working days)
1.	Receive and log grievance	1
2.	Acknowledge grievance	2
3.	Assess and investigate	7-14
4.	Grievance resolution	7-14
5.	Grievance disclosure	7