

GRIEVANCE REDRESS MECHANISM POLICY

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1. Introduction

The Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC) was set up to provide guarantees for loans provided to Micro, Small and Medium Enterprises (MSMEs) by Participating Lenders. The programme covers 6 countries of the Eastern Caribbean and there are many external stakeholders in all the countries. While all efforts are made to ensure that all environmental and social safeguards are in place during the process of approving guarantees for MSMEs, there may be instances where parties that may be affected may not have had an opportunity to voice their concerns. This Grievance Redress Mechanism (GRM) provides channels whereby issues pertaining to the Project may be raised with ECPCGC. As a World Bank supported project, the Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC) is also bound by the World Bank's Grievance Redress Service (GRS), which ensures that complaints that are received are promptly reviewed to address the concerns raised. This is a part of the larger Environmental and Social Management Framework (ESMF) that is an integral part of the project. ECPCGC would provide multiple avenues for customer feedback and corrective action would be taken, where required. The Grievance Redress Mechanism (GRM) outlines the process by which this important function would be carried out.

2. Statement of Policy and Purpose

The Grievance Redress Mechanism (GRM) documents the process and procedures by which the important function of client redress would be carried out. It is a key tool through which stakeholders can exercise their rights to be heard. The following are the guiding principles of the GRM:

- Legitimacy: ECPCGC would conduct the grievance process fairly.
- Accessibility: ECPCGC would make every effort to become known to all its stakeholders and provide easy access to its officers.
- Predictability: ECPCGC would provide a clear timeframe for the stages of resolution of complaints.
- Equitability: ECPCGC would ensure that aggrieved parties have access to relevant sources of information relative to their complaint
- Transparency: ECPCGC would endeavour to keep parties apprised of the progress of claims.

- Continuous Learning: ECPCGC would analyse claims and identify lessons learnt so that they could be applied to its operations.

Some key phrases are defined below:

Query: Request for clarification on a matter.

Complaint: An issue and concern pertaining to the Project that affects stakeholders and needs to be addressed by the company. **Grievance:** An issue of some gravity that is affecting persons as a direct result of activities from the project. Non-resolution could result in legal action or adversely affect the operations of the project.

Complainant: The Person filing the complaint with ECPCGC

Grievance Redress Mechanism: An established procedure embodying a set of rules for dealing with the queries and complaints that may be raised by concerned stakeholders. It provides a forum for stakeholders to dialogue with the company in a spirit of openness and transparency.

GRM Team: An internal dedicated team comprising senior officers of ECPCGC that would deliberate on the queries/complaints received.

3. Scope and Objectives

The objective of this mechanism is to outline in a clear, unambiguous manner, the framework for customer redress. This Grievance Redress Mechanism is a means of receiving stakeholder input about the impact of the policies, procedures and operations of ECPCGC. It is intended to be collaborative, expeditious and effective in resolving concerns through various investigative means. It is the first line of recourse but does not replace formal legal channels of redress. The stakeholder always has the option of alternative channels, including legal recourse. If no resolution could be brokered with the complainant, there is the possibility of hiring an impartial mediator. If this fails, the legal option may be utilised.

The GRM has the following objectives:

- I. Establish a prompt, easy to understand, consistent and respectful mechanism to manage the reception, investigation and response to complaints or grievances from community stakeholders,
- II. Ensure proper documentation of complaints or grievances and any corrective actions

taken, and,

- III. Contribute to continuous improvement in performance levels through the analysis of trends and lessons learned.

4. Responsibility for the GRM

The eventual responsibility for the resolution of complaints resides with the Chief Executive Officer, who would assign the cases to the Environmental, Social, Health and Safety Specialist (EHSS) and would provide the resources necessary for investigation. A team comprising senior staff would deliberate on all complaints. The team members are the CEO, Chief Financial Officer, Senior Operations Officer.

Roles and responsibilities of the team at ECPCGC

Chief Executive Officer:

- Eventual responsibility for the resolution all grievances.
- Provides the resources necessary for the resolution of grievances.
- Member of the GRM Team.

Chief Financial Officer:

- Responsible for allocating the financial resources necessary for the investigation and resolution of claims.
- Member of the GRM team.

Senior Operations Officer:

- ECPCGC issues guarantees for loans to MSMEs. Complaints would normally revolve around projects done with loans that have been guaranteed by ECPCGC. The Senior Operations Officer would be responsible for working with EHSS to determine which loan funds would have been used and given rise to the complaint.
- Part of the investigation support team for EHSS.
- Member of the GRM team.

Environmental Social Health and Safety Specialist:

- Serves as the initial point of contact for any grievances regarding any of the social and environmental protections.
- Investigates all grievances that are reported.
- Consults with the internal GRM team to develop resolutions to grievances.
- Follows up on all reports.
- Ensure that the GRM procedures are maintained.
- Maintains the grievance log.
- Conducts awareness training internally and also with external stakeholders.

Independent Arbiter:

- Contracted by ECPCGC for specific claims
- Liaises with the GRM team, and complainants to resolve issues that could not be resolved at the level of the ECPCGC team.

5. Method of submitting complaints

There are several methods by which complaints can be made to ECPCGC - by telephone, by email, or by a letter sent to ECPCGC. The details are as follows:

Telephone number: 869 466 8251

Email address: info@ecpcgc.org

Mailing address: The Eastern Caribbean Partial Credit Guarantee Corporation
Bird Rock, P.O. Box 188,
Basseterre, St. Kitts and Nevis

6. The Grievance Process

The steps of the GRM are as follows:

Step 1: Grievance receipt and acceptance

The Environmental, Health and Social Specialist (EHSS) receives and registers the complaint in a log. The EHSS officer is the first point of contact for all grievances. All complaints received, verbally, by email or otherwise, must be accepted and actioned by ECPCGC.

Step 2: Acknowledgement, assessment and record

EHSS acknowledges receipt to the complainant, via a telephone call, followed by a letter, or an email, with a guide as to the process and the timeline for resolution. The acknowledgement letter must also state the point of contact for the query. The acknowledgement should be sent within 3-5 days of receipt of the complaint. The details are logged in an electronic register held with ECPCGC and assigned a tracking number. Complaints must include a name, date, contact information and a detailed description of the case. The log would track the date received, date resolved, and the actions taken, including any communications with the complainant. Complaints would be categorized according to type: health, social, environmental, or process related issues. EHSS assesses the complaint and discusses with the internal GRM team.

Step 3: Investigation

The EHSS assesses the complaint and the level of risk and discusses with the internal GRM team of ECPCGC. The assessment would determine the relevance of the complaint to ECPCGC. If found relevant, the claim would be investigated thoroughly. The GRM team would determine the stakeholders to be engaged and the appropriate actions to be taken by the EHSS. During the investigations, consultations would be held (if necessary) with the complainant to clarify any issues. Site visits and discussions with Participating Lenders would also form a part of the investigation process, if necessary. All such discussions would be minuted and logged. The full results of the investigation would be shared with the GRM internal team. They would discuss with the EHSS and would formulate an appropriate response, with relevant time frames for action.

Step 4: Resolution

The response would be communicated to the complainant by the EHSS, via telephone in the first instance, followed by email or postal mail. In some cases, there would be negotiation until agreement on an appropriate resolution is reached. Such discussions would include at least one member of the GRM team in addition to the EHSS. Once the agreement is reached, ECPCGC moves forward with the resolution of the issue, implementing the steps that have been agreed, within the stipulated time frames. This must be done to the satisfaction of all parties involved.

If there is no agreement, the complainant would be informed of alternative procedures for redress as outlined below.

Step 5: Complaint Satisfaction

Upon completion of the implementation steps the complainant signs a declaration that the issue has been resolved satisfactorily. This is co-signed by ECPCGC and other affected stakeholders.

Step 6: Documentation management

The EHSS closes the case, documenting the resolution, and ensuring that all discussions / actions are minuted and logged. The GRM team discusses the closed claim. All complaints would be analysed by type and examined for trends, and lessons learnt. A full report would be issued and filed, and appropriate measures would be implemented to avoid repeat instances.

The details of the complaint would be published on ECPCGC's website, without compromising the confidentiality of the claimants, except if they give their express consent for such disclosure.

7. Alternative Redress mechanisms

If at Step 4 above, there is no agreement of the response with the complainant, steps would be taken for an impartial mediator to become involved in the process.

If this mediation process does not work, legal channels would be pursued for resolution. The legal fees will be the responsibility of the complainant.

8. Final tier of redress

The complainant also has the option of approaching the World Bank for resolution of issues. The Grievance Redress Service complaint form can be found at: www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5. The GRS ensures that complaints are promptly reviewed to address project related concerns. All complaints should be sent:

By email to: grievances@worldbank.org

By mail to: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H Street NW,
Washington, DC 20433, USA

9. Outreach

ECPCGC would build awareness of the GRM among its stakeholders by publishing the GRM on the website. There would be clear instructions on how to use the GRM, and the process that follows the submission of the grievance would be highlighted. Complaints would be reviewed periodically and changes to procedures would be recommended where required. In addition, the EHSS would be going out to communities to let them know of the existence of the various channels and to illustrate how they should be used.

GRIEVANCE COMPLAINT FORM

Date received:

File number:

Complainant's information:	<i>This information must be provided. The identity of complainants will be kept confidential if they request so. Anonymous complaints will not be accepted</i>
Name:	(<input type="checkbox"/> Mr., <input type="checkbox"/> Ms., <input type="checkbox"/> Mrs., or <input type="checkbox"/> Other salutation)
Address:	
Phone number:	
E-mail address:	
Contact info if different from above:	
Request for confidentiality:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Risk of retaliation:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Project Information:	
Project name:	
Project location: Village, Country	
Responsible party:	
What harm do you believe ECPCGC financed project caused or is likely to cause to you?	
Please include any other information that you consider relevant.	
How do you wish to see the complaint resolved?	
Has this issue been raised with anyone else?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Please provide the name of the person / agency with whom this was raised	
Date:	
4. Signature:	

GRIEVANCE REDRESS MECHANISM INTERNAL LOG

File #	
Date received	
Person receiving	
Date acknowledged	
Guarantee #	
Financial institution	
Country	
Borrower	
Purpose of loan	
Complainant name	
Complainant address	
Complainant phone number	
Complainant email address	
Details of complaint	
Actions taken:	<i>To be completed fully, with dates</i>
1	
2	
3	
Proposed resolution	
Resolution accepted	
Resolution not accepted	
Further steps taken	<i>To be completed fully, with dates</i>
1	
2	
3	
Final resolution details	

