

**TA-7566 REG: STRENGTHENING AND USE OF COUNTRY  
SAFEGUARD SYSTEMS - COMMUNITY CONSULTATION AND  
GRIEVANCE REDRESS MECHANISM**

**GUIDELINE ON GRIEVANCE REDRESS MECHANISM  
ON ENVIRONMENT AND SOCIAL SAFEGUARDS  
FOR ROAD SECTOR PROJECTS**

**Committee of Roads  
Ministry of Investments and Development  
Republic of Kazakhstan**

**NC Kazautozhol JSC**

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**ABBREVIATIONS**

ADB	Asian Development Bank
CC	Construction Contractor
CoR	Committee of Roads
CSC	Construction Supervision Consultant
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRM Guideline	Guideline on Grievance Redress Mechanism
EBRD	European Bank for Reconstruction and Development
IFI	International Financial Institution
Kazautozhol	NC Kazautozhol JSC
MID	Ministry of Investments and Development
NGO	Non-government organization
OAI	Office of Anticorruption and Integrity
PMC	Project Management Consultant
RoK	Republic of Kazakhstan
WB	World Bank

## DEFINITION OF TERMS<sup>1</sup>

**Grievance** may refer to any complaint, concern, injustice, wrongdoing, accusation related to the project implementation. It also includes queries, suggestions and comments.

**Grievance Redress Mechanism (GRM)** is a set of specified procedures for revealing, assessing, methodically addressing grievances or complaints and resolving disputes and monitoring. It is a mechanism whereby queries or clarification about a project are responded to systematically, problems that arise out of implementation are resolved and grievances are addressed efficiently and effectively.

**Grievance Redress Committee (GRC)** is a special body established to strengthen grievance redress mechanism for the projects in road sector implemented by the Committee of Roads (CoR) under the Ministry of Investments and Development (MID) of the Republic of Kazakhstan (RoK) and NC Kazautozhol JSC (Kazautozhol). GRCs are established for each project and include regional level and central level committees.

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1. Definition of terms is based on the Guidelines on the Community Liaison Group prepared for the ADB-funded projects in Zhambyl Oblast of CAREC Corridor 1 and endorsed in 2011.

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**TABLE OF CONTENTS**

	<b>Page</b>
ABBREVIATIONS	2
DEFINITION OF TERMS	3
1. INTRODUCTION	5
2. OBJECTIVE OF GRM GUIDELINE	5
3. RESPONSIBILITIES OF PARTIES, LEVELS AND TIME FRAME FOR GRIEVANCE REDRESS	6
4. GRIEVANCE REDRESS PROCESS	12
5. MONITORING AND REPORTING	15
6. DISCLOSURE OF GRIEVANCE REDRESS PROCEDURE	16
7. LAUNCHING OF THE GRM	17
<b>ANNEXES</b>	
ANNEX A. GRIEVANCE REGISTRATION FORM	18
ANNEX B. FORM OF THE MINUTES OF GRIEVANCE CONSIDERATION BY GRC	19
ANNEX C. GRIEVANCE REDRESS MONITORING FORM	20

## 1. INTRODUCTION

1. Grievance redress mechanisms are getting increasingly important for infrastructure development projects where ongoing risks or adverse impacts are anticipated. They serve as a way to meet requirements, engage communities, reduce risks, and assist larger processes that create positive social change. Grievance redress mechanisms can be an effective tool for early identification, assessment, and resolution of complaints on projects.

2. Under the investment programs funded by the International Financial Institutions (IFI), and, in particular, the Asian Development Bank (ADB), the European Bank for Reconstruction and Development (EBRD) and the World Bank (WB), it is required that an efficient consultation and grievance redress mechanism be established to assist affected persons to resolve queries and complaints if any, in a timely manner. Such requirements are incorporated into the loan agreements for each project and reiterated in environmental and social safeguard documents. This Guideline on Grievance Redress Mechanism assumes that adequate resources are made available for the system to function effectively.

3. A grievance redress mechanism (GRM), aims to: (i) reduce conflict, risk of undue delay and complication in project implementation; (ii) improve quality of project activities and outputs; (iii) ensure that the rights of affected parties are respected; (iv) identify and respond to unintended impacts of projects on individuals; and, (v) maximize participation, support and benefit to local communities.

4. A project-level grievance mechanism is a locally based, formalized way for the project proponents and implementers to accept, assess, and resolve community complaints related to project activities and impacts. It offers a package of widely understood and effective procedures for solving problems that are culturally appropriate, in combination with specially trained personnel, and aims to help parties reach speedy, efficient, and acceptable amicable resolutions with dignity, justice, and finality.

5. This document describes the objectives, scope and mechanisms of the grievance redress, which will be available to any person (such as community residents, local businesses or others who consider themselves affected by project activities). This will enable them to readily and efficiently communicate their grievances (the term “grievance” is specified in Definition of Terms). A GRM provides a readily accessible means for communities to address issues involving them and the projects – directly, rapidly, and at no cost to complainants. For a grievance mechanism to be effective, all project stakeholders need to understand and support its purpose. Stakeholder parties, including affected communities, must be aware of and clearly understand the grievance mechanism’s benefits to them.

## 2. OBJECTIVE OF THE GRM GUIDELINE

6. This Guideline on Grievance Redress Mechanism (GRM Guideline) is designed as an umbrella document addressing the grievance redress approaches to be applied for transport sector projects. It should be noted that the GRM Guideline is intended to be used as a guidance document for stakeholders involved in design, preparation and implementation of road projects, and complements grievance redress requirements incorporated in the loan agreements, as well as environmental and social safeguard documents (in case of projects funded by IFIs).

7. The overall objective of the GRM Guideline is to establish an effective communication channel among the stakeholders for providing a timely and efficient two-way feedback mechanism to address any complaints made about the project, including those from members of the communities, local businesses and other stakeholders, as well as raising

public awareness on the projects and on the availability of a GRM mechanism. The Grievance redress procedure suggests resolution of grievances in the spirit of mediation between the parties, and should comply with the spirit of IFI standards and practices.

8. It is expected that a properly designed and implemented grievance management process can provide benefits to both the project implementers and the communities by increasing the likelihood of resolving minor disputes quickly and fairly - with solutions that reasonably satisfy both sides. GRM can also help identify and resolve issues before they are elevated to formal dispute resolution methods, including the courts.

9. Through this GRM Guideline, it is expected that project implementation delays can be reduced, the quality of work can be improved, adverse impacts on the environment and people can be avoided or reduced, and benefits of projects to the communities along the road corridors can be maximized.

10. Specific objectives of GRM Guideline include:
- Facilitation of an effective dialogue and open communication between the project stakeholders;
  - Development of an accessible, transparent and efficient complaint procedure for people involved in and/or impacted by road sector projects;
  - Clear definition of roles and responsibilities of the various parties involved in consideration and resolution of grievances;
  - Establishment of procedures and standards for recording, sorting, investigating, handling of grievances, and providing feedback;
  - Establishment of a mechanism for responding to complaints in an understanding, transparent and culturally appropriate way;
  - Increase of awareness on project activities and available mechanism for amicable resolution of grievances,
  - Minimization of grievances regarding the project activities and impacts, better management of expectations;
  - Improvement of the projects performance (including environmental and social performance) through ensuring monitoring of grievance redress process and periodic progress reporting.

### **3. RESPONSIBILITIES OF PARTIES, LEVELS AND TIME FRAME FOR GRIEVANCE REDRESS**

11. The GRM will be available for those living or working in the areas impacted by the project activities. Any person impacted by or concerned about the project activities will have the right to participate in the GRM, will have easy access to it, and will be encouraged to use it. The proposed GRM does not replace the public mechanisms of complaint and conflict resolution envisaged by the legal system of the RoK, but attempts to minimize use of it to the extent possible.

12. The GRM follows the general project management structure of the investment program, wherein overall responsibility for timely implementation of GRM lies with the Committee of Roads (CoR) and Kazautozhol supported by teams of consultants, such as Project Management Consultants (PMC), Construction Supervision Consultants (CSC) involved in managing and supervising the civil works and other activities under the investment program, while Construction Contractors (CC) undertake the actual civil works. Relevant oblast, rayon and community akimats, who are mandated by law to perform grievance redress related tasks, and mediators / NGOs, who are involved in facilitating the amicable resolution of grievances are also included in the mechanism.

13. This GRM Guideline envisages two levels of grievance resolution for the road sector projects implemented under the supervision of the CoR: Grievance Redress Committees

(GRC) at regional (oblast) and central (Astana) levels. The flow chart showing GRM process is presented in the Picture 1 following the narrative description provided in sub-sections 3.1 – 3.3.

### 3.1 GRM: Regional Level

14. At the first stage, the resolution of grievance will be attempted through GRC at regional level. The GRC at regional level is composed of representatives from Kazautozhol's respective regional branch, representatives of relevant akimats (rayon and oblast levels), Construction Contractors, Construction Supervision Consultants, etc. The role of GRC at regional level covers the following tasks:

- (a) Record grievance,
- (b) Consider its appropriateness for resolution under this GRM Guideline;
- (c) Sort and coordinate all project-related grievances (i.e., all complaints concerning the project that includes both social and environmental components);
- (d) Consider grievance, investigate the issue, facilitate and mediate resolution of grievance;
- (e) Document status of the complaint and its resolution;
- (f) If the complaint cannot be resolved pass it to the GRC at central level (Astana), for resolution, including appropriate documentation and justification why it was not resolved at the regional level;
- (g) Provide feedback to the complaining party and ensure reporting;
- (h) Promote awareness and facilitate communication between communities and the project parties, including Kazautozhol regional branch, akimats, PMCs, CSCs, CCs, NGOs / mediators;
- (i) Disseminate project related information (brochures, leaflets, etc.) to the local community.

15. The GRC at regional level will be established for each project and will be composed of the following parties:

- (a) Representatives of regional branch of Kazautozhol JSC (deputy manager, and safeguard specialist or lawyer);
- (b) Representatives of PMC (safeguard specialists and community liaison specialist);
- (c) Representatives from oblast and rayon akimat (1 from each akimat located in the project area);
- (d) Representatives of CSC (manager/deputy manager and safeguard / community liaison specialist);
- (e) Representatives from CC (manager/deputy manager and safeguard / community liaison specialist).

16. Akims of all the communities located in the project area will be informed on the GRM process and will be involved in considering the grievances and can attend the GRC meeting in case the issue is related to the community led by them.

17. In addition, professional mediator (representative of NGO or individual experienced in mediation and facilitation of grievance resolution) may be involved in resolution of grievance case, as needed.

18. A representative from the regional branch of Kazautozhol will chair the GRC at the regional level and be responsible for the overall operation of GRM and its efficient and timely implementation. Safeguard specialist / community liaison specialist will be nominated by the management of the regional branch of Kazautozhol. He/she will act as coordinator of the GRC at regional level, responsible for involving the relevant parties and coordinating the works of GRC at regional level. At CC and CSC the grievance focal points will be nominated (by the managers of the appropriate companies) to be responsible for receiving the grievances and trying to resolve them on spot, recording of grievances lodged at their offices,

collecting appropriate information regarding grievance cases, communicating the issue to the GRC coordinator at regional level based in Kazautozhol (respective regional branch). At the beginning of each project, the GRC at regional level will be established and the appropriate minutes (including composition of GRC) will be compiled by the regional branch of Kazautozhol and shared with all involved parties, as well as Kazautozhol central office and CoR.

19. Roles and Responsibilities: functions of GRC coordinator at the regional level (based in Kazautozhol respective regional branch) include:

- (a) Establish and maintain communication with members of the GRC at regional level, CCs, CSCs, akims of affected communities and Kazautozhol regional branch on possible concerns or questions from residents related to the project;
- (b) Collect grievances, sort them and record grievances in a logbook as well as complete Grievance Registration Form (Annex A);
- (c) Acknowledge receipt of mailed, e-mailed or faxed complaints no later than 3 working days. Receipt of grievances lodged on the spot or via phone is confirmed immediately;
- (d) Arrange for GRC meetings at regional level to consider the grievance case and ensure that all appropriate materials are available to members of GRC not later than in 1 week. Following the meeting of GRC at the regional level, complete the Minutes of Grievance Consideration by GRC by the GRC, circulate to members and the complainant for confirmation (Annex B);
- (e) Register steps and activities undertaken with respect to each case in the Grievance Redress Monitoring Form (Annex C);
- (f) Provide information on the status of resolution to the complaining party;
- (g) Maintain and regularly update the grievance database for each project;
- (h) Communicate with Coordinator of GRC at central level and pass to him/her grievances that remain unresolved by GRC at regional level;
- (i) Ensure that residents and akims of affected communities are well aware of GRM, including contacts of grievance focal points at CCs, CSCs, members of GRC at regional level, and Kazautozhol regional branch, as well as have access to GRM leaflets and brochures;
- (j) Report on grievance redress on a quarterly basis (including forms completed as well as grievance database) to cover the grievances received and status of their resolution for inclusion in the quarterly progress reports.

20. Kazautozhol regional branch will provide administrative/staff support to GRC at regional level, including: (i) appointment of GRC Coordinator, who is familiar with the environmental and social background of the project; (ii) maintaining a file of meetings and activities GRC at regional level; (iii) establishing and regularly updating a consolidated database of grievances received for each project; and (iv) preparing a summary on the progress with grievance resolution and GRC's operation and reporting to Kazautozhol central office and CoR, as well as appropriate IFIs (as needed).

21. Regular meetings of the GRC at the regional level will be held on a bi-monthly basis, to ensure compliance with a grievance resolution timeline. However, special ad hoc meetings may be arranged as needed to discuss urgent cases with the participation of key concerned parties. Following consideration of each grievance case, the minutes of the meeting will be elaborated to document the steps undertaken and resolution/recommendation provided (the format for GRC minutes is provided in Annex B). Minutes of the GRC meeting at the regional level will be compiled by the GRC coordinator. All the documents and records on grievance redress will be maintained by the GRC coordinator at the regional level and linked to the GRM database.

22. For IFI funded projects, at the request of the GRC at the regional level, the IFI's project team may provide inputs to GRM on matters related to applicable IFI policies including those concerning anticorruption measures, safeguards, gender, procurement,



consulting services, and disbursement. The IFI's project team may also wish to participate in GRC meetings, carry out reviews, as necessary.

23. Overall, the GRM allows for multiple channels/entry points to submit complaints, including akims, CCs, CSCs, PMCs, Kazautozhol regional branches. Affected people and the general public may address their complaints and queries to any of the entities involved in GRM.

24. Queries and complaints that are clarified and resolved by the receiving party can be closed immediately. Cases that will require further assessment and action from project implementing parties will be considered by the GRC at regional level. Within ten working days the GRC at regional level will discuss the grievance case and recommend its settlement to parties. Cases that cannot be resolved by the GRC at the regional level will be referred to the GRC at central level.

### 3.2 GRM: Central Level

25. Following unsuccessful consideration of grievance by GRC at the regional level, complaint resolution will be attempted at a central level where a GRC will be established. The GRC at the central level is composed of representatives from Kazautozhol central and regional offices, CoR, etc. The role of the GRC at central level includes the following tasks:

- (a) Review grievance details and appropriate background information, including notes / minutes of meeting of GRC at regional level with respect to the specific grievance case;
- (b) Consider grievance, investigate the issue, facilitate and mediate resolution of grievance;
- (c) Coordinate with and involve relevant state entities and project parties (PMC and others) to facilitate resolution of grievances;
- (d) Document status of the grievance and its resolution;
- (e) Provide feedback to complaining party;
- (f) If the complaint cannot be resolved by GRC at central level, recommend its resolution providing references to normative-legal acts of RoK, including justification why the grievance cannot be resolved through an informal process;
- (g) Promote awareness and facilitate communication between various project parties, including, CoR, Kazautozhol central office and regional branches, akimats, PMCs, civil society organizations / non-governmental organizations / mediators, IFIs;
- (h) Disseminate project related information (brochures, leaflets, etc.) to the state and local stakeholders.

26. The GRCs at central level will be composed of the following parties:

- (a) Representatives of Kazautozhol (manager involved in project implementation and safeguard specialist);
- (b) Representative of CoR (dealing with investment projects and safeguard issues);
- (c) Representatives of regional branch of Kazautozhol (deputy manager, and safeguard specialist or lawyer).

27. For grievances related to each project the representatives of the PMC for the particular project (team leader and appropriate safeguard specialists) will be invited to take part in the meeting of the GRC at central level. The complaining party, as well as representatives of relevant state stakeholders, oblast / rayon / community akimats, CSCs, CCs (as needed) will also be invited to attend the GRC meeting.

28. In addition, professional mediator (representative of NGO or individual experienced in mediation and facilitation of grievance resolution) may be involved in resolution of grievance case, as needed.

29. A representative of Kazautozhol (manager involved in supervision of project implementation) will be the chair of the GRC at central level and will be responsible for overall operation of GRM and its efficient and timely work, including for IFI funded projects. Safeguard specialist of Kazautozhol will act as the GRC coordinator at central level responsible for receiving grievance cases from the GRCs at the regional level, ensuring appropriate recording and data collection, involving the relevant parties, coordinating the work of the GRC at the central level, and informing the parties on the outcomes of grievance consideration. Minutes and other documents on establishment of the GRC at the central level (including orders on GRC composition, relevant communication and agreements, orders on appointment of GRC coordinator and other appropriate documents) will be compiled by the GRC coordinator at central level (safeguard specialist of Kazautozhol) and shared with all involved parties, as well as with appropriate IFIs (as necessary).

30. Roles and Responsibilities: GRC coordinator at the central level:
- (a) Establish and maintain communication with the members of the GRC at the central level, Kazautozhol regional branches (including GRC coordinator at regional level) and PMCs on pending concerns or questions from stakeholders related to each project;
  - (b) Collect and record grievances that were not resolved through the GRC at regional level;
  - (c) Acknowledge receipt of unresolved grievance from coordinators of GRCs at regional levels no later than 3 working days;
  - (d) Arrange for GRC meetings at the central level to consider the grievance case and ensure that all appropriate materials are available to members of the GRC;
  - (e) Following the meeting of the GRC, complete the Minutes of Grievance Consideration by GRC and circulate to all members and the complaining party for confirmation (Annex B);
  - (f) Register steps and activities undertaken with respect to each case in Grievance Redress Monitoring Form (Annex C);
  - (g) Maintain a grievance logbook, ensure that appropriate information is recorded and details on the status and steps undertaken for resolution of the case are included;
  - (h) Provide information on the status of grievance consideration to the complaining party and respective GRC coordinator at regional level;
  - (i) Based on the data provided by Kazautozhol regional branches (GRCs coordinators at regional level), as well as data from the GRC at the central level, maintain and regularly update the centralized grievance database, including separate entries for each project;
  - (j) Keep a separate track of cases, which were not resolved through the GRM and were referred to be resolved through RoK legal system;
  - (k) Ensure that relevant state and local stakeholders are aware of the GRM;
  - (l) Based on the data provided by Kazautozhol regional branches (GRCs coordinators at regional level), as well as data from the GRC at central level, on a monthly basis, develop summary reporting on grievance redress to cover the grievances received and status of their resolution, and share that with CoR and IFIs (as necessary).

31. The GRC at the central level will discuss the grievance case within twenty working days and recommend its settlement to parties. Regular meetings of GRC at central level will be held, at least monthly (in case there are grievances). In the meantime, special ad hoc meetings may be arranged as needed to discuss urgent cases with the participation of key concerned parties.

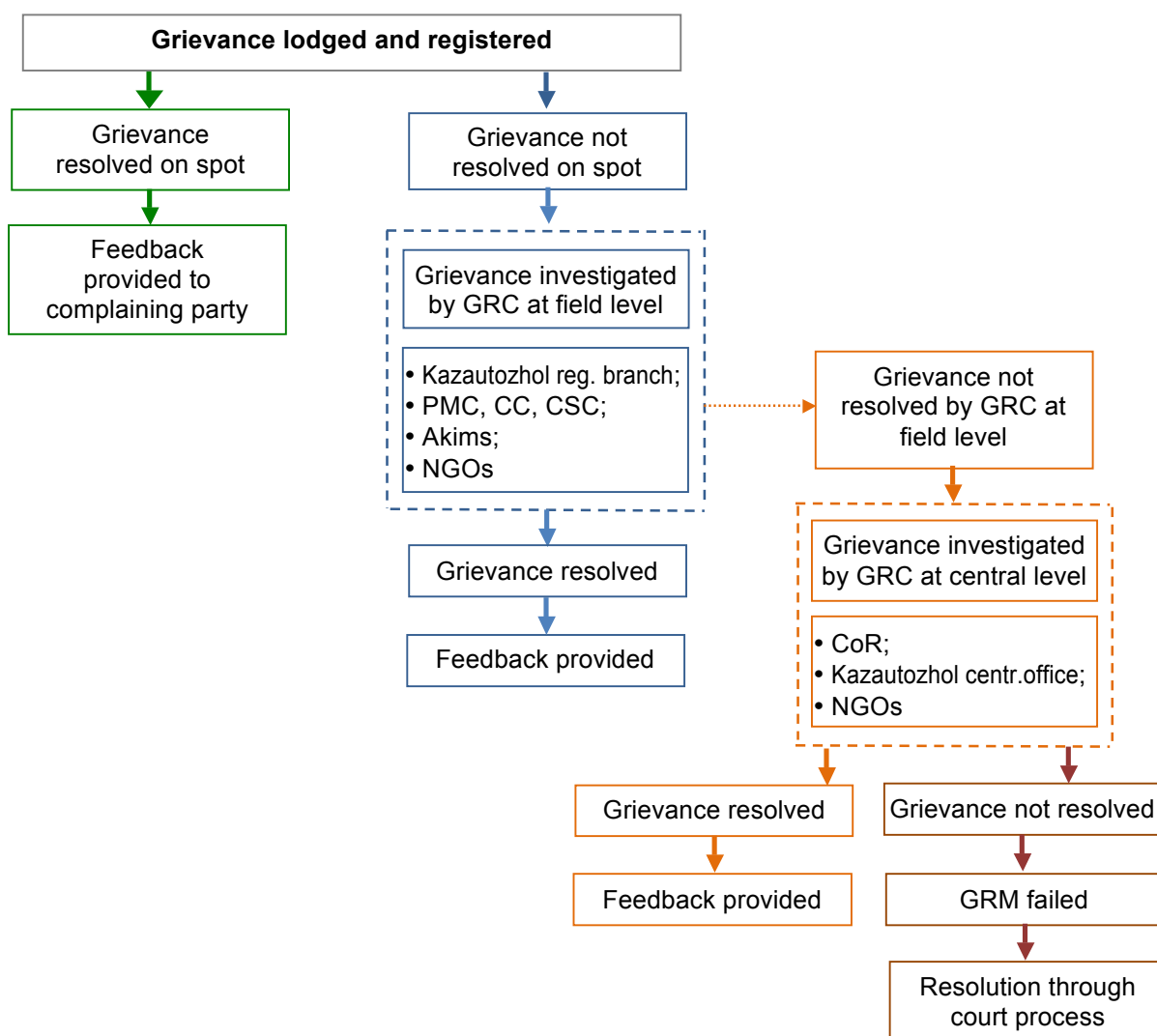
32. Following consideration of each grievance case, the minutes of meeting will be elaborated to document the steps undertaken and resolution/recommendation provided (the format of GRC minutes of grievance consideration is provided in Annex B).

33. For IFI funded projects, at the request of the GRC at the central level, the IFI's project team may provide inputs to GRM on matters related to applicable IFI policies including those concerning anticorruption measures, safeguards, gender, procurement, consulting services, and disbursement. The IFI's project team may also wish to participate in GRC meetings, carry out reviews, as necessary.

### 3.3 GRM: Legal System

34. If after the intervention and assistance from the GRCs at both regional and central levels, no solution has been reached, and if the grievances redress system fails to satisfy the complaining parties, the case will be referred to the court for resolution in accordance with the RoK legislation.

35. In the meantime, it should also be emphasized that these GRM Guideline do not limit the right of the complaining party to submit the case to the court of law in the first stage of grievance process.



Picture 1: Flow chart showing GRM process

## 4. GRIEVANCE REDRESS PROCESS

36. The grievance redress process includes the following four major steps:
- (a) Grievance registration;
  - (b) Grievance sorting;
  - (c) Grievance processing; and
  - (d) Provision of feedback/reporting.

### 4.1 Grievance Registration

37. Complainants or concerned individuals may visit, call or send a letter or e-mail or fax to community akimat, grievance focal point at CCs and CSCs, GRC Coordinator at Kazautozhol regional branch to register their grievances related to road sector projects. Receipt of grievances received through a letter or e-mail or fax shall also be acknowledged through a letter / e-mail / fax within 3 working days upon receipt by GRC coordinator at regional level. Receipt of grievances lodged in person or via phone will be acknowledged immediately.

38. Each project level party participating in the GRC at regional level shall maintain a record-book to register the complaints, and regularly share the grievance details with GRC coordinator at regional level, in order to keep the track of grievances and the status of their resolution. The GRC coordinator at the regional level shall coordinate with each member of the GRC on a weekly basis, collect relevant documents, maintain a consolidated registry of complaints received, follow-up on the status of resolution of each complaint received, maintain an up-to-date grievance database and provide relevant reporting.

39. Whichever channel is used for receiving the grievance (e.g. e-mail, mail, fax, call, etc.), its registration will be made by the GRC coordinator at the regional level, who will acknowledge receipt and follow up with the grievance investigation and consideration by the GRC at regional level. All the grievances will be recorded in a standard format (Annex A), which will include but not limited to the following details:

- Contact information of the affected party;
- Date, time, and place where the complaint was received;
- Name of the person who received the grievance;
- Details of the grievance.

40. In case the complainant refuses to provide contact details or no contact information is available in the grievance received by e-mail / mail / fax, the GRC at the regional level will consider the anonymous complaint. In such cases, the printed response will be posted at the information board of the Kazautozhol's respective regional branch, as well as at the information board of the relevant akimat, so as the complaining party can approach and get familiarized with the feedback.

41. The GRC coordinator at regional level will collect the data on grievances and centralize the grievance registry to assure that every affected person, group or community has an individual registry number and that follow-up and corrective actions are implemented as per resolution provided, or if the issue was not resolved at regional level, it is passed for consideration at the central level. The grievance database will be maintained and updated on a bi-monthly basis by the GRC coordinator at regional level for each project. The database will be designed to make it simple and easy to input data, provide information on grievance and status of its resolution, timeline for resolution and level at which the issue was considered and resolved, track individual grievances, etc. The grievance database will specify details of grievance resolution and include information on satisfaction of complaining party by the resolution provided (excluding the cases of grievance lodged anonymously).

Where it will not be possible to resolve grievances to the satisfaction of both parties, appropriate information will be reflected in the database. The GRC coordinator at regional level for each project will share the grievance database with the safeguard specialist of Kazautozhol central office / GRC coordinator at central level, who will maintain and update the centralized grievance database for all road sector projects.

## 4.2 Sorting of Grievances

42. Upon receipt of grievances, the GRC coordinator at regional level shall sort the grievance according to the following categories. All grievances, regardless of type should be registered in the logbook and the grievance database:

*Type A: queries, comments, and suggestions.*

This type is non-contentious and merely requires clarification or a response. This may be answered at the point of intake by staff of CC, CSC, community/rayon/oblast akimat, or by mediators/NGOs after Kazautozhol and PMC concurrence.

*Type B: allegation of violation of rights or non-performance/poor performance of obligations against consultants, contractors, Kazautozhol, or dispute.*

Depending on the complexity of the complaint, this may require further data collection/investigation, facilitation or mediation. Cases will be referred to GRC at regional level to attempt resolution.

*Type C: allegation of fraud or corruption.*

This type of complaint cannot be handled under the project's grievance redress mechanism. For such cases, the complainant should be referred to the appropriate state entity of IFI's project team to get information and support in lodging the grievance.

43. In case the grievance is not relevant to the project activities and/or impacts caused by project implementation, it will not be considered under this GRM Guideline and not included in the logbook and grievance database, and will be forwarded to community/rayon/oblast level akimat, as relevant. Feedback will be provided to the complaining party with explanation on why the issue cannot be considered under this GRM Guideline and to which entity that has been forwarded.

## 4.3 Grievance Processing

44. Depending on the nature of grievance, this step may include verification, investigation, negotiation, mediation or arbitration, coordination with appropriate agencies and decision-making. Verification includes gathering of documents, proofs and facts, as well as clarifying background information in order to have a clear picture of the circumstances surrounding the grievance case. Verification will be undertaken by members of the GRC at the regional level, and overall coordination of activities will be ensured by the GRC coordinator. Results of verification or fact-finding activities will be presented at the meeting of the GRC at regional level, where the issue will be considered and resolution will be sought.

45. The GRC at regional level will discuss the grievance case within ten working days and recommend its settlement to parties. Meetings of the GRC at the regional level will be held on a bi-monthly basis; however, special ad hoc meetings can be arranged is between of regular meetings as needed. The GRC coordinator at regional level will ensure that actions

and decisions are properly documented in order to demonstrate that the GRC at regional level is providing an appropriate attention to the grievance and is actively seeking ways to obtain resolution that could satisfy the parties.

46. If grievance cannot be resolved by the GRC at the regional level and is passed for consideration by the GRC at the central level, appropriate documents collected during investigation and fact-finding shall be shared with the GRC coordinator at the central level. The GRC coordinator at the central level will circulate such documents among the members of GRC at central level, to ensure that they are aware of all relevant details prior to GRC meeting.

47. Consideration of grievance case by GRC at central level, may require further verification of the issue, including gathering of additional documents, obtaining input from various state stakeholders and project parties in order to have a clear picture of the circumstances surrounding the grievance case. Additional verification will be undertaken by members of GRC at the central level (as needed), and overall coordination of activities will be ensured by the GRC coordinator at central level. Results of verification will be presented at the meeting of GRC at the central level, where the issue will be considered and resolution will be sought.

48. The GRC at the central level will discuss the grievance case within twenty working days and recommend its settlement to parties. Regular meetings of GRC at central level will be held on a monthly basis; however, special ad hoc meetings can be arranged is between of regular meetings as needed.

49. If following its consideration by the GRC at central level, the grievance cannot be resolved to the satisfaction of the parties, the recommendation will be made to seek resolution through the courts. Irrespective of the outcome of grievance consideration, documentation regarding the case by the GRCs at regional and central levels will be collected and maintained by GRC coordinator at central level (with input from GRC coordinator at regional level). The GRC coordinator at the central level will keep a separate track of cases, which were not resolved through GRM and were referred to the RoK legal system.

#### **4.4 Feedback provision**

50. This refers to the process of informing the complaining party on the status of the complaint or the provision of information required by a stakeholder with respect to the project.

51. At the regional level, for grievances lodged in the office or via phone to the GRC coordinator at regional level the acknowledgement of grievance receipt will be confirmed immediately. For mailed, e-mailed or faxed grievances acknowledgement of receipt will be provided by GRC coordinator at regional level not later than 3 working days. In case the grievance is not related to project activities or impacts generated due to the project implementation and cannot be considered under this GRM Guideline feedback will be provided to the complaining party to which entity (community/rayon/oblast level akimat, as relevant) it has been forwarded.

52. Acknowledgement of the grievance receipt, as well as response/recommendation will be provided to complaining party through preferred mode of communication mentioned in grievance registration form.

53. If grievance was resolved at regional level, the complaining party will be informed of the outcome. If grievance was not resolved at the regional level and was passed to the GRC at the central level for consideration and resolution, appropriate information will be provided

to the complaining party, including the date when the case was passed to GRC at the central level and the date by which the outcome at the central level is expected.

54. If the grievance was resolved at the central level, the complaining party will be informed on the outcome of grievance resolution. If grievance was not resolved by the GRC at central level, appropriate information will be provided to the complaining party, including details why the case was not resolved, as well as recommendation to seek for resolution through RoK legal system.

55. If the grievance was anonymous or the complainant refused to provide contact details, the information on status of grievance redress and outcomes resolution process, will be posted on the information boards of relevant regional branch of Kazautozhol and relevant community / rayon / oblast akimats. Outcomes of the grievance resolution process will also be documented in the grievance database and reflected in the project periodic progress reports.

## **5. MONITORING AND REPORTING**

56. Grievances shall be captured for monitoring and reporting using the Grievance Registration Form and logbooks of the parties of GRM at regional level. The Grievance Registration Form shall be filled for each grievance case (relevant to the project) by GRM parties at regional level where the grievance was lodged (CCs, CSC, PMCs, akimats, Kazautozhol regional branch), if necessary.

57. The GRC coordinator at the regional level will coordinate GRM activities with members of GRC at regional level on a weekly basis to update GRC's consolidated database of complaints for each project. Each member of the GRC at the regional level will have access to the grievance database and will be provided with an electronic copy of the grievance database file in MS Excel format.

58. The GRC coordinator at regional level will monitor the grievance resolution process (sample form for grievance monitoring is provided in the Annex C), and prepare a summary report on GRM, which will be included in its quarterly progress report. The GRC coordinator at the regional level will submit the grievance monitoring forms (relevant parts completed), as well as grievance database for each project to the GRC coordinator at central level on a monthly basis.

59. The GRC coordinator at central level will collect data from the GRC coordinators at regional level, undertake monitoring of the overall GRM process (finalize the forms provided in Annex C and pre-completed by GRC coordinators at regional level), track timelines of grievance resolution, recommend corrective actions to GRC coordinators at regional level (as needed), and prepare a summary report on GRM, which will be shared with CoR (and IFIs, as needed) on quarterly basis. In addition, the GRC coordinator at central level will maintain a centralized grievance database for all road sector projects funded by IFIs and will update that on monthly basis. The copies of the grievance database should be shared with CoR (and IFIs, as needed) on a monthly basis. In addition, the GRC coordinator at central level will prepare summary reports on a semi-annual and annual basis (as needed) and submit them to the CoR (and respective IFI, as needed).

60. To ensure timely and effective resolution of grievances, it is recommended to establish a tracking system and define key performance indicators. This approach will enable the assessment of the overall effectiveness of the GRM and allow for corrective actions as needed. The following key performance indicators are recommended for assessing efficiency of GRM:

- *Participation*  
Percentage of grievances related to project activities and impacts channeled through the GRCs at both levels – the target is to have 100% of grievances addressed through the informal GRM before the grievance is referred to legal system of the RoK for resolution;
- *Effectiveness*  
Percentage of complaints lodged that received effective and timely response through informal GRM – the target is to have 100% of grievances channeled through informal GRM;
- *Resolution*  
Percentage of complaints resolved at the regional and central levels – the target is to have 70% of grievances resolved through the informal GRM;
- *Recurrence Reduction*  
Number of recurrent complaints received – the target is to gradually reduce the number of complaints of each type by 50% through better management and timely implementation of corrective actions designed based on the similar previous cases raised and resolved previously. The overall intention is to learn on previous experience and respond to grievances in a manner that, over time, reduces their rate of occurrence;
- *Influence*  
This indicator identifies policy or performance / conduct changes in project related stakeholders influenced by an evaluation of GRM performance of indicators and analysis of grievances.

## 6. DISCLOSURE OF GRIEVANCE REDRESS PROCEDURE

61. The grievance redress procedure for the project will be disseminated through information leaflets and brochures, and presented during the project related meetings and public consultations. During these gatherings, it should be emphasized that the informal GRM is aimed at quick and amicable resolution of complaints and does not substitute the legal process established under national legislation.

62. At the beginning of each project (commencement of construction at each section of the road) community consultation shall be carried out by CCs and CSCs under the coordination and supervision of the GRC coordinator at regional level to ensure people's awareness of the availability of the GRM, steps of grievance resolution as well as contacts and locations of focal points to be approached in case of grievance.

63. CCs, CSC, PMCs, Kazautozhol regional branches and akimats, as well as NGOs and professional mediators are considered as the key actors of the GRM and play a crucial role in disseminating the information on GRM and facilitating quick and amicable resolution of complaints. The GRC coordinator at the regional level shall coordinate information dissemination activities on GRM, and ensure that the posters providing details on GRM and contacts of grievance focal points at CCs and CSCs, GRC coordinator at regional level are posted in publicly accessible and visible places at every construction site and in every affected community. In addition, the information on GRM (leaflets, brochures), including contact details grievance focal points at CCs and CSCs, GRC coordinator at regional level, should be available at the offices of CCS, CSCs, PMCs, akimats, Kazautozhol regional branches.

64. In the areas populated by minority groups meetings shall be held and information leaflets shall be provided in the linguistically appropriate manner, if the language used by the minority group is different from official language of RoK.



## 7. LAUNCHING OF THE GRM

65. Launching of the GRM will include the following steps:
- (a) CoR endorses the GRM Guideline;
  - (b) Establish the GRCs at regional and central levels, nominate GRC members;
  - (c) Nominate GRC coordinators at regional and central levels;
  - (d) Inform relevant stakeholders, local authorities, akims of communities located in project areas on availability of GRM Guideline and establishment of GRCs;
  - (e) Publish information on the GRM and its details, including contact information of GRCs on official web-sites of CoR of the MID, Kazautozhol, and project implementation related web-sites, as available;
  - (f) Ensure that the information on GRM and its details, including contact information of GRCs is made available at the offices of all parties involved in GRM (CCs, CSCs, PMCs, akimats, NGOs, Kazautozhol regional branches).

66. In addition, capacity building activities will be undertaken to ensure awareness on GRM and knowledge of appropriate procedures and steps. The handouts on GRM will be developed in Kazakh and Russian to be distributed among the project stakeholders and in the communities located in the project area.

## ANNEX A. GRIEVANCE REGISTRATION FORM

<b>GRIEVANCE REGISTRATION FORM</b>	
<b>CONTACT INFORMATION</b>	
Name:	Gender: <input type="checkbox"/> Male / <input type="checkbox"/> Female
Address:	
Community:	Telephone:
Rayon and Oblast:	E-mail:
Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Preferred mode of communication for feedback: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail
<b>DESCRIPTION OF GRIEVANCE / SUGGESTION / QUESTION</b>	
Please provide details (who, what, where, when) of your grievance below:	
In case any other actions were undertaken by the complainant with respect to the grievance case, please provide details on past actions (if any):	
Please provide details on your suggested resolution for grievance:	
<b>GRIEVANCE REGISTRATION DETAILS</b>	
Name of registrant:	
Organization:	Position:
How the grievance was lodged: <input type="checkbox"/> in person / <input type="checkbox"/> mail / <input type="checkbox"/> e-mail / <input type="checkbox"/> phone / <input type="checkbox"/> fax / <input type="checkbox"/> _____	Type of grievance: <input type="checkbox"/> type A / <input type="checkbox"/> type B / <input type="checkbox"/> type C
Documents attached:	Grievance is relevant to project: <input type="checkbox"/> Yes / <input type="checkbox"/> No if "No" it was forwarded to: _____
Remarks:	
Signature of registrant:	Date of grievance:

**ANNEX B. FORM OF THE MINUTES OF GRIEVANCE CONSIDERATION BY GRC**

<b>FORM OF THE MINUTES OF GRIEVANCE CONSIDERATION BY GRC</b>	
<b>GRIEVANCE DETAILS</b>	
Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No	No of grievance in logbook:
Name of complainant:	No of grievance in database:
Date of grievance:	Acknowledgement provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No by: <input type="checkbox"/> mail / <input type="checkbox"/> phone / <input type="checkbox"/> e-mail / <input type="checkbox"/> on spot
Date of registration:	
Grievance registrant name:	Date of acknowledgement:
Brief description of grievance:	
<b>MEETING DETAILS: GRC AT REGIONAL LEVEL</b>	
Date of meeting:	Resolution provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No
Participating GRC parties and names: <input type="checkbox"/> Kazautozhol _____ <input type="checkbox"/> Akims _____ <input type="checkbox"/> PMC _____ <input type="checkbox"/> CSC _____ <input type="checkbox"/> CC _____	Brief description of resolution / recommendation provided:
Participating invited parties and names: <input type="checkbox"/> Complainant _____ <input type="checkbox"/> NGO / mediator _____ <input type="checkbox"/> Other _____	Feedback provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No by: <input type="checkbox"/> mail / <input type="checkbox"/> phone / <input type="checkbox"/> e-mail / <input type="checkbox"/> posted on information board
Attached documents:	Date of feedback:
<b>MEETING DETAILS: GRC AT CENTRAL LEVEL</b>	
Date of meeting:	Resolution provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No
Participating GRC parties and names: <input type="checkbox"/> Kazautozhol _____ <input type="checkbox"/> CoR _____	Brief description of resolution / recommendation provided:
Participating invited parties and names: <input type="checkbox"/> Complainant _____ <input type="checkbox"/> NGO / mediator _____ <input type="checkbox"/> PMC _____ <input type="checkbox"/> Other _____	Feedback provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No by: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail / <input type="checkbox"/> on spot <input type="checkbox"/> posted on information board
Attached documents:	Date of feedback:
<b>For use of CRG Coordinator / minutes taker:</b>	
Remarks:	
Name and signature of minutes taker:	Date of minutes preparation:

**ANNEX C. GRIEVANCE REDRESS MONITORING FORM**

<b>GRIEVANCE REDRESS MONITORING FORM</b>	
<b>COMPLAINING PARTY DETAILS:</b>	
Name of complainant:	Gender: <input type="checkbox"/> Male / <input type="checkbox"/> Female
Address:	Telephone:
Date of grievance:	E-mail:
Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Preferred mode of communication for feedback: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail
<b>GRIEVANCE REGISTRATION DETAILS:</b>	
Grievance registrant name:	Acknowledgement provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No by: <input type="checkbox"/> mail / <input type="checkbox"/> phone / <input type="checkbox"/> e-mail / <input type="checkbox"/> on spot
Date of registration:	
No of grievance in logbook:	Date of acknowledgement:
No of grievance in database:	
Brief description of grievance:	
<b>REVIEW BY GRC AT REGIONAL LEVEL</b>	
Date of meeting:	Feedback provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No by: <input type="checkbox"/> mail / <input type="checkbox"/> phone / <input type="checkbox"/> e-mail / <input type="checkbox"/> posted on information board
Date of meeting minutes:	Date of feedback:
Resolution provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Complaining party is satisfied <input type="checkbox"/> Yes / <input type="checkbox"/> No / <input type="checkbox"/> N/A
Brief description of resolution / recommendation provided:	
<b>REVIEW BY GRC AT CENTRAL LEVEL</b>	
Date of meeting:	Feedback provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No by: <input type="checkbox"/> mail / <input type="checkbox"/> phone / <input type="checkbox"/> e-mail / <input type="checkbox"/> posted on information board
Date of meeting minutes:	Date of feedback:
Resolution provided: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Complaining party is satisfied <input type="checkbox"/> Yes / <input type="checkbox"/> No / <input type="checkbox"/> N/A
Brief description of resolution / recommendation provided:	

<b>STATUS UPDATE NOTES</b>		
Action 1	Action 2	Action 3
Description of Action:	Description of Action:	Description of Action:
Party responsible:	Party responsible:	Party responsible:
Name of responsible:	Name of responsible:	Name of responsible:
Date:	Date:	Date:
Brief description of outcome:	Brief description of outcome:	Brief description of outcome:
<b>FINAL RESOLUTION:</b>		
Case resolved <input type="checkbox"/>	Case closed/dismissed <input type="checkbox"/>	Case referred to court <input type="checkbox"/>
Remarks:		
Name and signature of GRC coordinator completing monitoring form:	Date:	