

JAMAICA SOCIAL INVESTMENT FUND

ISO 14001:2015 CERTIFIED

Investing for Community Development

Grievance Redress Mechanism Policy

I. Introduction to JSIF

The Jamaica Social Investment Fund (JSIF) is a limited liability company incorporated under the Company's Act of Jamaica. It was established in 1996 as a component of the Government of Jamaica's (GoJ's) national poverty alleviation strategy. The Fund was designed primarily to channel resources to small-scaled community-based projects. This is done with the use of an Operations Manual that acts as a guide to ensure transparency, accountability and efficiency in project implementation.

The operations of the JSIF were initially funded by a loan negotiated between the GoJ and the World Bank. Though the Fund was initially established as a temporary organization with an initial lifespan of four (4) years, it has been in operation for twenty-five (25) years; invested an estimated USD 200 million, of which approximately 80% is on infrastructure projects.

The implementation of these projects presents risk of conflicts which could cause deviations project achieving its intended objectives. Therefore, if projects are to be implemented successfully, project stakeholders must be confident that there is an established process for grievances to be heard and addressed transparently. Consequently, JSIF has established a grievance redress mechanism (GRM) and will always respond to the concerns and grievances of project-affected parties in a timely manner.

The JSIF's GRM is a standardized system, however where possible, the process of handling grievances will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive. The JSIF's GRM will utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements.

The JSIF will 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 JSIF's GRM allows opportunities for access to judicial or administrative remedies for grievances expressed by project-affected parties. The JSIF will inform stakeholders and especially project-affected parties about the grievance process during community engagement activities, and will make publicly available any records documenting the responses to all grievances received, if requested.

The JSIF will handle grievances in a culturally appropriate manner and will be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The JSIF's GRM will also allow for anonymous complaints to be raised and addressed.

2. Purpose of the GRM

To ensure that grievances, complaints and concerns are addressed and resolved in a fair, transparent and easily accessible manner in order to achieve the goals of restoring positive relationships with affected persons/households and communities.

- To be responsive to the needs of beneficiaries and to address and resolve their grievances;
- To serve as a conduit for soliciting inquiries, inviting suggestions, and increasing community participation;
- To collect information that can be used to improve operational performance;
- To promote transparency and accountability
- To deter fraud and corruption and mitigate project risks
- To facilitate timely feedback from local communities about Contractor's performance in order to support the project's commitment to continuous improvement

3. JSIF's Grievance Redress Mechanism Overview

The JSIF's Grievance Redress Mechanism (GRM) Policy outlines the procedures the organization will follow to effectively resolve issues reported by parties whose rights have been affected or perceived to have been adversely affected by its projects' activities. This GRM Policy is developed as part of the JSIF's thrust for good governance and will enable residents across the country, project beneficiaries, contractors, consultants, employees, interested parties, and other affected stakeholders to raise grievances with the JSIF and to seek redress when they perceive a negative impact arising from the organization's project activities. The GRM provides a transparent modality for JSIF to mitigate, manage, and resolve potential or realized negative impacts of projects' activities. The JSIF recognizes that the establishment of a functional GRM is an international best practice that can contribute to

improved relationships with stakeholders and interested parties; and consequently, is committed to the implementation of effective policies in this regard.

4. Transparency.

The JSIF will always be transparent to the aggrieved party in the process and the outcome of individual grievances. The JSIF will balance the need for transparency and confidentiality in the publication of the outcomes of grievances. Strict consultations with the aggrieved party and other applicable stakeholders will guide the level of disclosure with respect to the outcome of grievances.

The JSIF will prepare and disclose quarterly reports on the operation of the grievance procedures, detailing the number of grievances, their nature, and statistics on how they have been resolved. Again, where the results of the grievances are of interest to the local community or the wider public, consultations will be had with the aggrieved individual(s) prior to the disclosure of the outcomes.

5. Actions to Avoid Grievances.

The JSIF's development projects are typically implemented through the services of contractors, consultants, and community groups. These actors interact directly with the communities and could be a source of contention with other project stakeholders. The JSIF will therefore continue to exert strict management of these entities to avoid grievances. The JSIF will provide training continually for contractors, consultants and other project stakeholders with a view to increase awareness of its operational procedures and by extension reduce the risk of creating conflicts.

6. Accessibility and Availability.

The JSIF will readily provide information to project stakeholders and interested parties about the existence and functioning of the GRM to increase awareness. Several strategies will be employed in this regard to include the following.

- The GRM policy will be disclosed on the JSIF's website and the intranet.
- The GRM will be discussed at all applicable stakeholder consultation meetings.
- The GRM will be integrated in the JSIF's project information meetings (PIMs).

- The GRM will be included in the discussions for all JSIF's capacity building training
- The JSIF's Environmental and Social Framework (ESF), and Environmental and Social Management Framework (ESMF) will contain a summary of the GRM and will be disclosed on the JSIF's website.
- Information about the GRM will also be posted on the JSIF's social media platforms.
- The JSIF may also carry-out community announcements posters or announcements on local radio.
- The public will also receive information through other State entities including the Social Development Commission (SDC).

7. GRM process

Step 1:

Publicizing Grievance Redress Mechanism Manual: GRM manual should be publicize and make sure the availability of manual to all stakeholders.

Step 2: Receiving and Keeping Track of the Grievances: Once stakeholders are aware of the mechanism and access it to raise grievances, there is need of processing the grievances.

Processing includes: 1) collecting grievances; 2) recording grievances as they come in; 3) registering them in a central place; and 4) tracking them throughout the processing cycle to reflect their status and importance

Step 3: Reviewing and Investigating Grievances: All grievances will need to undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances

Step 4: Developing Resolution Options and Preparing a Response: Once the grievance is well understood, resolution options can be developed taking into consideration Stakeholders preferences, project policy, past experience, current issues, and potential outcomes

Step 5: Monitoring, Reporting and Evaluating a Grievance Mechanism: Monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism and the efficient use of resources, and for determining broad trends and recurring problems so they can be resolved

proactively before they become points of contention. Monitoring and reporting also create a base level of information that can be used to report back to communities.

8. Types of Grievances

Different types of grievances surface at different stages of the project cycle, e.g., during project design and planning, during project implementation or during project operation phase. Grievances are also spread over a wide range of issues and concerns. Concerning to the activities in the following types of grievances could arise;

- Land related grievances
- Grievances related to the traffic congestion during construction and operation phase.
- Grievances regarding environmental and social impacts due to the contractor work (dust, sanitation and noise due to construction activities etc.).
- Delay in the salaries of labors.
- Grievances raised by contractor Publicize the Mechanism Receive and Register Review and investigate Develop Resolution options, Respond to the Grievances Monitor and Evaluate

9. Lodging Grievances

The JSIF will make every attempt to make the modality and process of reporting complaints as broad and easy as possible. The JSIF will continually consult with project stakeholders to determine the most appropriate method(s) for reporting complaints. It is the JSIF's policy to allow for broad representation on any consultative body, including youth, women, and marginalized and any applicable vulnerable groups. It is important that its design does not entrench existing power structures, for example by involving only senior men in the community. Gender sensitive issues will definitely be factored in the JSIF's GRM. It will ensure that women are able to express grievances freely and without fear and intimidation. Also, the JSIF will always provide multiple ways for grievances to be raised to avoid conflicts of interest.

The following outlines the range of modalities the JSIF made available for project affected persons (PAPs) to lodge complaints or grievances.

- The JSIF's web-based system, "Beneficiary Grievance Feedback Tool", which is currently in development, will be the primary mechanism for stakeholders to lodge grievances. The JSIF is cognizant of the need for PAPs to be able to raise grievances **confidentially** and **anonymously** and therefore this platform will allow just that. It will enable for persons with illiteracy issues to raise grievances with assistance through a trusted confidant such as a family member, friend, or a designated official.
- Direct complaints to a JSIF officers assigned to the particular sub-project.
- Direct complaints to site supervisors or consultants.
- Calling JSIF's telephone lines (876-968-4545)
- JSIF's social media platforms (jsifja to access Instagram, Facebook and twitter);
- E-mails (feedback@jsif.org); and
- Fax complaints at 876-929-3784
- Additionally, representatives of line ministries and other government agencies can communicate grievances to JSIF on behalf of PAPs.
- Employees can report grievances directly to HR, senior management, or through the suggestion box.

10. The Grievance Redress Team

The grievance redress team will be selected based on competence and experience. Typically, members must receive training in environmental and social safeguards standards. At minimum, the grievance redress team will comprise the Social Development Manager, a Social Officer (SO), Project Officer (PO) and an Environmental Officer (EO). The Manager for the project which the grievance is related will also be invited to participate in assessing and resolving the grievance. The Legal Officer (LO) will provide legal guidance throughout the process of resolving grievances; and where necessary, approve documents.

11. Grievance Acknowledgement, Recording, Assessment and Investigation

It is our policy that all reported grievances must be registered in the grievance registry or communications log maintained in SharePoint. All staff has access to report grievances in the registry. Once a grievance is reported, the complainant will be notified within **one day** that

that his grievance has been received, via email, phone call or text. The grievance registry form will be updated to indicate when confirmation was provided.

The JSIF will assess and investigate all grievances to determine their merit. This investigation will look at the source(s) of the grievance, the actual or potential impact, long term implications including financial impacts, and the possible solution or mitigation measures. If deemed necessary, the JSIF will perform a deeper risk assessment. In performing the investigations, the JSIF will include all the necessary stakeholders in consultation meetings to thoroughly ventilate the matter. The JSIF will record the minutes of all meetings and input the information in the grievance registry form.

12. Grievance Resolution

The process for resolving a grievance is as follows:

- i. The JSIF's grievance redress team will meet with the aggrieved individual(s) and any supporting partner with a view to resolve the grievance through JSIF's internal mechanism.
- ii. Once there is a consensus on the resolution, both JSIF and the aggrieved party will **sign an agreement** stating that the matter has been settled.
- iii. This agreement will be uploaded in the grievance registry in SharePoint.
- iv. Where both parties are unable to agree on a resolution, an independent third party such as a reputable person from the community will be engaged to try to find common ground. Again, if a consensus is agreed on, both parties will sign an agreement which will be uploaded to the grievance registry in SharePoint.
- v. In situations where the above process failed, the next step is to try to resolve the matter through arbitration. Arbitration will be done by appropriate local institutions such as a Justice of the Peace, Community Works Coordinator, and the Dispute Resolution Foundation (which is a government supported NGO with links to the courts). The courts do refer cases to the Foundation for arbitration as a measure to seek a faster resolution to disputes.
- vi. Where arbitration is unsuccessful, either party can take the matter to the full court where a judge will decide on the way forward.

Depending on the findings and their severity, the JSIF will seek to resolve grievances immediately. However, under normal circumstances, the organization will seek to resolve grievances within one to four (1-4) weeks of the grievance being reported by the complainant.

Where complaints warrant urgent action, rendering the regular GRM procedure inappropriate or too slow to prevent an issue from escalating, the JSIF will seek the approval of senior management to fast-track the GRM process so as to facilitate resolution in a timely manner.

13. Complainant Satisfaction

At the end of the process, the JSIF will conduct a complainant satisfaction survey to determine how satisfied the aggrieved party is with the process. The satisfaction survey will be uploaded into the JSIF's grievance registry.

14. Documentation Management

The JSIF will keep documented information of all the procedures followed throughout the process. The organization will continue to update and sustain a suitable system for ensuring maintenance of proper documentation of all relevant stages in the process. The system will include a complaint form, minutes of any meetings held by the GRM committee or other body, and signed agreement to any resolution to a grievance. Where applicable, the JSIF will use technology e.g. GPS coordinates, to track the physical location of the sources of the grievances so that grievance patterns can be analyzed spatially, to help identify particular problems and solutions.

15. Grievance Monitoring and Oversight

Whilst the JSIF's grievance redress team will be directly responsible for implementing the activities to ensure that grievances are resolved, the Internal Audit Department (IAD) led by the chief Internal Auditor, will provide independent oversight of the process. The IAD is

staffed with an auditor with over twenty years of experience and an Internal Audit Assistant to whom delegation takes place with the oversight of the Chief Auditor. The IAD is not only skilled at handling audit issues but receiving various complaints ranging from project, employee complaints, conduct of external stakeholders etc. Reporting to the Board through the Audit Committee issues brought to the IAD's attention are aimed at resolution of said issues. This will include grievances that require resolution outside of the JSIF's internal mechanism; for example, those that require a dispute resolution process. Therefore, all grievances must be reported to the IAD. The IAD will prepare and document a report on the outcome of the grievance process.

Approved by:



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26/11/21
Date