



Strengthening Grievance Mechanisms in Georgia



CASE STUDY

Acknowledgments

This report was part of an effort to strengthen the right to remedy in World Bank operations and beyond by building the capacity of World Bank staff, clients, and project-affected people, especially the vulnerable and marginalized, to implement effective grievance mechanisms so that they can improve service delivery, risk management, and development outcomes. The core team, led by Sanjay Agarwal and Saki Kumagai, comprised Harika Masud and H el ene Pfeil at the World Bank.

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Introduction

Whether through the rehabilitation of roads, the construction of electricity transmission lines, or the implementation of local infrastructure, projects led by public sector entities influence the lives of citizens in a tangible way. It is therefore essential that project-affected people are given a chance to provide feedback on initiatives from the very start of project preparation and that if elements of project implementation do not meet their expectations, there is a clear path to having their concerns addressed.

Three project implementation units (PIUs) in Georgia—the Roads Department, the Georgian State Electrosystem (GSE), and the Municipal Development Fund (MDF)—have been implementing 11 World Bank-supported projects in their respective fields of competence in the years spanning the period 2013–22 (see table 1.1). Each of these PIUs has implemented grievance mechanisms (GMs)¹ allowing project-affected people to raise concerns and problems and get them resolved. However, many

complaints were sent directly or escalated to the World Bank’s country office because complainants were dissatisfied with the way their issues had been handled; resolving their concerns required a great deal of support from the World Bank’s social team.² Thus, there seemed to be room to upgrade the overall quality of grievance management and reporting, which led to the World Bank providing dedicated technical assistance to the PIUs focused on improving and better aligning their respective GMs with the principles of legitimacy, accessibility, predictability, equity, transparency, rights compatibility, continuous learning, engagement, and dialogue, as defined in the United Nations’ Guiding Principle 31 on Business and Human Rights.

A World Bank team initiated the technical assistance initiative in November 2019 (box 1.1).³ Rather than taking a project-by-project approach, the team worked with more than one PIU at a time to create synergies and economies of scale, build

TABLE 1.1. WORLD BANK-FINANCED PROJECTS IMPLEMENTED BY THE ROADS DEPARTMENT, THE GEORGIAN STATE ELECTROSYSTEM AND THE MUNICIPAL DEVELOPMENT FUND IN GEORGIA, 2013–22

| Roads Department | Georgian State Electrosystem | Municipal Development Fund |
|---|---|--|
| <ul style="list-style-type: none"> • Secondary and Local Roads Project III • Secondary Road Asset Management Project • East-West Highway 4 • East-West Highway Corridor Improvement Project | <ul style="list-style-type: none"> • Transmission Grid Strengthening Project • Energy Supply Reliability and Financial Recovery Project | <ul style="list-style-type: none"> • Regional Development Project II • Regional Development Project III • Second Regional and Municipal Development Project • Sustainable Wastewater Management Project • Integrated Local and Regional Development Project (in the pipeline) |

1. A grievance mechanism is a system that is set up and operated to receive and facilitate the prompt handling of information requests, suggestions, positive feedback, and concerns or grievances by project-affected parties.

2. Furthermore, data provided by the World Bank’s Grievance Redress Service at the time of this writing indicate that all seven cases recorded in the system for Georgia concerned road construction and electrification projects

3. The World Bank team included senior social development specialists. The technical assistance initiative was initiated with a mission to Georgia, followed by ongoing conversations.



Box 1.1. A World Bank Initiative to Strengthen Grievance Mechanisms

In 2019, a World Bank mission conducted a diagnostic of the grievance mechanisms (GMs) of three project implementation units (PIUs) in Georgia—the Roads Department, the Georgian State Electrosystem (GSE), and the Municipal Development Fund (MDF)—to support their preparation of action plans for GM improvement. Key activities organized under the initiative included:

- At an initial workshop with technical staff from the three PIUs, the World Bank team shared international best practices for grievance redress and facilitated a GM assessment exercise.
- Responding to a request from the PIUs, the World Bank team organized a presentation on management information systems for effective GMs.
- The mission team conducted field visits to communities in Rikoti and Khevi with the Roads Department, in Khashuri with the MDF, and in Persa with the GSE. Meetings were conducted with municipal focal points, local-level PIU staff, contractors, and selected project-affected persons to learn about their experiences.
- The World Bank team held a validation workshop with the three PIUs to share and validate key observations and findings and to assist their technical staff in preparing action plans for strengthening their respective GMs. These plans were later presented and endorsed by senior management—a crucial step to ensuring the effort’s sustainability. The PIUs agreed to implement their action plans in the six-month period following the mission.

These activities were instrumental in enhancing government staff’s awareness and knowledge of the right to remedy and its implications, as well as PIU staff’s technical capacity to effectively guarantee this right with well-functioning project-level grievance mechanisms.

Resources

A note prepared in the wake of the mission to Georgia provides comprehensive guidance and templates for task teams interested in implementing similar missions. Resources provided include a GM desk review worksheet, a GM self-assessment checklist, sample agendas for mission launches and validation workshops, indicative questions that can be used to gather information from national or subnational PIU representatives or GM users during field visits, a GM action plan template, and a proposed standardized way of reporting project-level grievance data. See *Assessing Project-Level Grievance Redress Mechanisms using a Human-Rights-Based Approach* (World Bank 2022).

A GM self-assessment checklist is available for download [here](#).

A checklist to assess a GM’s level of inclusiveness and alignment to the effectiveness criteria of the United Nations Guiding Principles and Human Rights is included in *Fostering the Inclusion of Disadvantaged and Vulnerable Individuals or Groups in Project-Level Grievance Mechanisms* (World Bank 2021).

1. INTRODUCTION



in-country capacity, and maximize impact. As part of this initiative, the PIUs crafted their own GM action plans outlining key areas for strengthening, which they have since been diligently implementing.

This note offers an overview of challenges and lessons learned from the 2019 effort, then reviews each of the PIU's GMs, including the respective GM complaint uptake channels, overall GM architecture, registration and categorization processes, investigation and resolution mechanisms, related

communication efforts, and grievance-related data. Efforts taken to strengthen the GMs since the 2019 technical assistance until late 2021 are highlighted,¹ and areas for growth are explored.

This note is intended for World Bank task teams and PIUs to show how a rapid diagnostic can lead to significant improvements in the design and implementation of GMs and a marked enhancement of social accountability in projects financed by multilateral development banks.

1. The Covid-19 pandemic slowed down the pace of project implementation overall, significantly reduced opportunities for in-person interaction for an extended period, and limited the uptake of grievance submissions.



Challenges and Lessons Learned

The challenges faced and lessons learned from the grievance mechanism (GM) diagnostic of the three selected project implementation units (PIUs) in Georgia—the Roads Department, the Georgian State Electrosystem (GSE), and the Municipal Development Fund (MDF)—are discussed below.

Documenting, acknowledging, and tracking unwritten grievances is often challenging, but dedicated efforts can help.

Complainants to the GSE’s grievance mechanism (GM) generally preferred to convey their grievances verbally—rather than in writing—to the municipality, field, and/or PIU GM focal points. In the past, the GSE’s GM did not systematically document verbal requests and responses (in-person or by phone), making estimating their number difficult. Similarly, the Roads Department’s GM did not previously capture or track a great deal of verbal and informal communication at subproject sites. In addition, the Road Department’s hotline receives thousands of calls every day—especially during the winter—mostly concerning road conditions, blockages, and the like. Such concerns are referred by phone to various departments, but no documentation of such referrals exists, and assuming some of these calls are grievances, they may not be recorded in the grievance database. In terms of the MDF, the Khashuri Municipality reported receiving approximately 280 phone calls per month—some related to donor-financed projects and others not—up to 10 percent of which may be grievances—but systematic recording is a challenge.

However, the PIUs have found ways to improve the uptake and recording of such grievances. One avenue has been to rely on trusted interlocutors at the local level, such as community liaison officers, who realize the importance of tracking and

reporting these grievances to the PIU. Another has been to train contractors, supervisors, field-level staff, and municipal representatives and to set up regular communication channels to keep the PIU well informed with an accurate overview of the entirety¹ of inquiries, feedback, and complaints voiced by project-affected parties. The sensitization of contractors appears to be particularly important because the quality of their relations with communities often influences the ease and speed with which complaints can be submitted, recorded, and satisfactorily resolved, especially in spatially dispersed projects.

It is easy to overlook the potential of gender-based violence, sexual exploitation and abuse, and sexual harassment in the absence of actual claims. But preparation and prevention work—such as developing specific protocols and communication materials for appropriately dealing with these complaints—is essential. Dedicated procedures for dealing with such allegations should be set up, including referral systems, and possible cooperation with relevant actors (e.g., the ATIP Fund in Georgia) should be explored—and is often required of new World Bank-financed projects, depending on the risk level determined during project preparation. Projects that have already been under implementation for several years are strongly advised to introduce such considerations and retrofit their GMs to account for the risk of gender-based violence, sexual exploitation and abuse, and sexual harassment.

GMs in practice can differ from how their structure is described in relevant resettlement action plans and other safeguard documents. In terms of projects implemented by the three PIUs in Georgia, their respective resettlement action plans foresaw the establishment of municipal grievance redress

1. If not the entirety, then PIUs should at least capture serious verbal grievances and then improve the recording system over time.



committees, which were either never established or only set up temporarily because their structure, composition, and mandate would not have added value to the grievance resolution process. In fact, the GMs organically evolved into a structure with individual municipal focal points either recording and solving complaints or transferring them to the PIU level, where a Grievance Redress Commission can deal with complex and cross-sectoral complaints. For example, for the MDF's projects, while municipal committees existed that gathered the heads of all municipal units, the MDF got directly involved from the outset in the grievance receiving and reviewing process, especially regarding resettlement action plans, to ensure a more immediate response and resolution. And although not initially envisaged under the resettlement policy framework, the GSE decided to empower the Grievance Redress Commission at the headquarters level to make binding decisions with significant cost implications linked to resettlement compensation, which proved instrumental in allowing for faster and more successful grievance resolution.

The new Environmental and Social Framework invites a more intentional focus on GMs because of their prominent place in stakeholder engagement plans. This has led some project teams to plan, budget, and develop dedicated GM brochures with information that would previously have only existed as a simple document attached to the resettlement action plan and therefore would have remained much less visible. According to some PIU staff, under previous safeguard policies, the scope of the GM was narrower and not generally considered a primary tool for community engagement, while Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure gives the GM a broader role interfacing with project-affected people. The findings from the technical assistance confirm a well-known point: dedicating adequate time and resources to meaningful consultations with affected communities can significantly reduce the number and severity of received grievances.¹

Prior to the technical assistance, GM procedures were usually informal and relied significantly on the tacit knowledge of key players along the GM value chain. The initiative has shown that it is important to formalize and document these procedures to establish a common understanding of GM processes for all relevant staff. Sometimes, this step is postponed or ignored because of capacity issues. A clear GM manual can enhance the coherence and reliability of the GM and ensure that in the event of staff turnover, knowledge and practices related to handling feedback from project-affected people remain consistent and can be effectively and uniformly communicated to all stakeholders. It can also encourage the wider adoption of the GM. For example, after the Roads Department developed such a guide, the procedures were applied to both donor- and state-funded road construction projects.

There is scope to improve grievance data disaggregation and analysis. Grievance logs tend to be considered a “tick-the-box” bureaucratic reporting duty rather than a tool that can help shed light on aspects of project implementation and potentially make improvements. Refining the way grievances are logged could make grievance data more useful to the PIU, for example, adding columns to the grievance database to indicate when the complaint was received; when it was acknowledged; when it was resolved; what uptake channel was used; the complainant's gender, age, disability, and/or other possible vulnerability markers; and the complainant's level of satisfaction. Automizing certain simple calculations could also help, such as the average time between receiving and resolving a complaint and the percentage of complaints that are related to a particular issue. Far from an unwieldy database, a well-designed, lean grievance log could potentially become a part of the PIU's day-to-day project management tools and enhance the quality of projects by flagging issues requiring attention so measures can be taken to prevent them from arising in the future. Such a grievance log could also aid in the detection of systemic, recurring issues as opposed to isolated grievance cases.

1. For instance, in one energy project, due to a tight implementation timeline, the construction was rushed, consultations were carried out superficially and hastily, land was not fully compensated prior to the start of the construction, and some grievances submitted to the contractor were not given adequate attention (with a view toward not halting construction). All this led the World Bank to issue a notice threatening disbursement suspension. In addition, the contractor and implementing agency went through an adjudication process.



Box 2.1. Key Challenges and Insights that Emerged Out of the Initiative

Key insights that emerged out of the grievance mechanism (GM) strengthening exercise include:

- Dedicated efforts and trusted interlocutors at the local level can improve the systematic uptake and reporting of verbal grievances.
- There is scope to strengthen communication and awareness raising around gender-based violence, sexual exploitation and abuse, and sexual harassment as part of project-level GMs.
- Effective GMs must reflect the on-the-ground reality of project implementation and be based on existing social accountability dynamics.
- The focus of the Environmental and Social Framework's Environmental and Social Standard 10 on stakeholder engagement, information disclosure, meaningful consultations, and effective GMs, as well as its formalization through the stakeholder engagement plan—including the possible allocation of financial and human resources to project-level GMs—are essential to optimizing the effectiveness of grievance handling and overall project implementation quality.
- There is value to systematizing a GM's procedures in manuals and policies to enhance its consistency and effectiveness.
- Most projects have room to improve grievance data disaggregation and analysis by capturing more detailed data on complaint handling and complainants and by identifying trends in the grievance data.
- Grievance outcomes should be publicized to inform people of the GM's actions and results. Such information can and should be communicated internally to the management of the public agency involved as well as externally to the general public to build their trust in the GM. Such reporting does not often occur, however, suggesting that further efforts are needed.

While it is commonly understood that high-level management endorsement and widespread public awareness account for a significant portion of a GM's success, institutionalized reporting of grievances and other feedback to PIU senior management and the public is often lacking. Regularly reporting findings of grievance data analyses to senior management and disclosing grievance-related information to the public can boost the usefulness of the collected grievance data by allowing decision makers to identify trends and needed remedial actions, and by building public trust in the GM's effectiveness, transparency, and oversight. Integrating grievance data into a project's standard progress reporting thus seems like a good practice to adopt.

Factors that have impacted implementation of the three PIUs' GM strengthening action plans that were endorsed by their respective management, include:

- ✓ The speed of progress has been driven largely by the personal commitment of the GM focal points at headquarters

(for example, in terms of updating grievance logs), and the degree to which they have been able to implement changes independently—or if progress depended on other actors, such as management, the public relations department, or a contracted consultant.

- ✓ Some delays in putting action points into practice can be attributed to contextual restrictions linked to the Covid-19 pandemic, for example, delays in planned in-person activities such as trainings. Some activities may have required a timeframe exceeding six months (see areas for growth in the following sections for each individual PIU).
- ✓ How well the changes have and will be implemented is also linked to the intensity and intentionality of the follow-up provided by the World Bank. This suggests that the systematic monitoring of grievance data by the respective task team specialists will be warranted to ensure the sustainability of the initiative.



Diagnostic of PIU Grievance Mechanisms

Georgian State Electrosystem



The Georgian State Electrosystem (GSE), Georgia's electricity transmission system operator, provides power transmission and dispatch services throughout the country. It is owned by the National Agency of State Property, part of the Ministry of Economy and Sustainable Development. The GSE plans and coordinates electricity generation and consumption and provides access to, maintains, and develops the transmission network, including constructing new cross-border and internal transmission lines and substations. The GSE's grievance mechanism (GM) was designed under the World Bank's Environmental and Social Framework, which was introduced in 2018 and was therefore included in the project's stakeholder engagement plan to address any concerns related to the project's environmental and social performance.

An Overview of the GSE's Grievance Mechanism

Uptake channels

- ✓ Verbally to a contractor, community liaison officer, or local municipality representative who can help the complainant write down and formalize the complaint
- ✓ Grievance registration form available at municipal city halls
- ✓ Letter addressed to the GSE's headquarters (Tbilisi, St. Baratashvili N2, 0105)
- ✓ Email: info@gse.com.ge
- ✓ Facebook: <https://www.facebook.com/electrosistema/>
- ✓ Hotline: +(99532) 2 510 202

Architecture

Contractors and field-level GM focal points, including community liaison officers hired for the recent World Bank-financed Georgia Energy Supply Reliability and Financial Recovery Project, receive and manage grievances. Grievances that cannot be resolved at the local level are escalated to the PIU-level GM focal point.

Grievances received by the GSE are assigned to the appropriate team (environmental, social, or technical). The Grievance Redress Commission is called into session for complex grievances, during which a complainant's case and all relevant information and documentation, including photographs, are presented and discussed, after which the GSE issues its final decision. The commission comprises the board of directors and the various department heads. Community liaison officers are also sometimes invited to attend its meetings. Since 2019-20, the GSE's director general has been heading the commission. The involvement of the GSE's highest level of management on the commission is vital to its ability to work efficiently and reach conclusions that have the political backing required for implementation.

Registration of grievances

Grievances received from different sources are documented and shared with the PIU-level GM focal point, who records all grievance information in a log, tracks and updates grievance data, and maintains hard and soft copies of case files. The grievance log is an Excel spreadsheet that classifies grievances by project, topic, answer dates, proposed resolution dates,



3. DIAGNOSTIC OF PIU GRIEVANCE MECHANISMS



Photos 3.1 and 3.2. Public and private consultations held in 2020 in the villages of Gori (left) and Paposhvilebi (above) to provide residents with project- and GM-related information.

and so on. Upon receipt, an acknowledgment is sent to the complainant, including a copy of the recorded grievance.

The GSE uses an e-document system, which allows for the uploading of paper documents (e.g., handwritten letters) and logs all relevant information and materials about a complaint (e.g., GIS imagery). The e-document system also allows the GSE's chairman to delegate grievances to responsible managers (department heads), who then assign their resolution to division heads (e.g., the GSE's environmental and social division).

Categorization of grievances

For the upcoming Jvari-Tskaltubo project, grievances are categorized along the following categories: construction-related issues, land-related issues, occupational health and safety issues, social issues,¹ road safety issues, environmental issues, and financial issues.

Investigation and resolution of grievances

The PIU's GM focal point oversees the completion of the grievance resolution process. If needed, a dedicated person is assigned to follow-up with complainants and work with them

to resolve grievances, which could involve the technical team going on field visits, involving the parties as needed. The final proposed resolution of the grievance is communicated to the complainant in writing. Complainants are informed of the decision within a maximum of 30 days, in accordance with the response time stipulated in the Administrative Code of Georgia.² If complainants are not satisfied with the resolution proposed by the GM focal point or the community liaison officer, they can appeal to the Grievance Redress Commission. Complainants are systematically informed of their right to appeal in court at any time if they do not agree with the proposed grievance resolution.

Communications

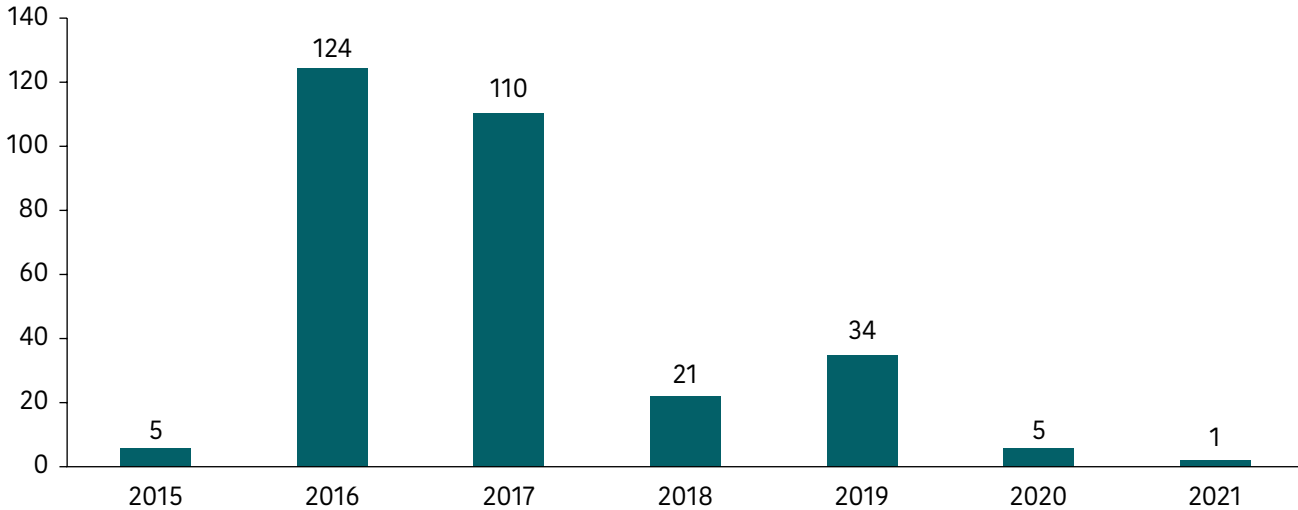
Information regarding the GM has been shared primarily during initial project consultations, which allow project-affected people to raise any questions or concerns they may have, for instance regarding the right of way, buffer zones, or safety of overhead lines (see photos 3.1 and 3.2). During such consultations, the functioning of the GM is explained in detail, and GM forms are distributed to community members.

1. Examples of social issues include disruption of public services (e.g., hospitals, schools, water, and electricity supply), historical sites, cultural sites, child labor, sexual harassment, sexual exploitation and abuse, staff misconduct/disrespect of the code of conduct, and issues related to local committee members.

2. The Administrative Code of Georgia (articles 178–201) provides an overall frame of reference that applies to all public sector entity GMs. Article 183 specifies that “an authorised administrative body shall be obliged to review (an) administrative complaint and make a respective decision within one month.” The timeframe may be extended “by no longer than one month,” but the complainant must be “immediately notified” in such cases.



FIGURE 3.1. NUMBER OF COMPLAINTS RECEIVED BY THE GSE PER YEAR



Community liaison officers play crucial roles in the ongoing provision of information about the GM and in liaising with the GSE’s headquarters about any potentially problematic issue related to project implementation. They set up information desks in the affected municipalities in easily accessible places, where they can meet and share information about the project with project-affected parties and other stakeholders.

Monitoring and Evaluation of Grievance Data

By the time of the 2019 mission, the GSE had recorded 256 grievances in its database regarding the Akhaltsikhe-Batumi Project, covering the years 2015–19. The average resolution time was about 15 days; 48 grievances were closed in less than one day.

Since 2020, 44 grievances were received by the GSE regarding the Akhaltsikhe-Batumi Transmission Line project and two regarding the Jvari-Tskaltubo project. All grievances have been resolved. Figure 3.1 shows the number of grievance numbers received by year; figure 3.2 illustrates the gender distribution of complainants; and figure 3.3 reveals the distribution of uptake channels used to file complaints with the GSE.

FIGURE 3.2. GENDER DISTRIBUTION OF COMPLAINANTS TO THE GSE

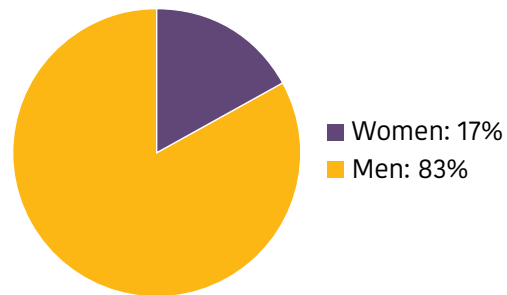
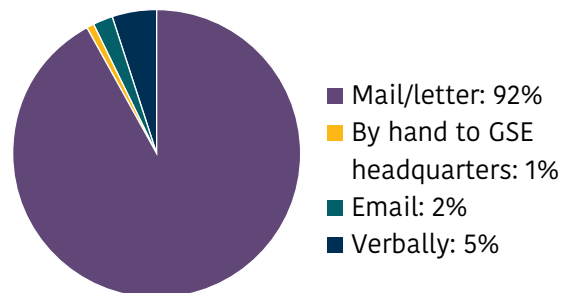


FIGURE 3.3. UPTAKE CHANNEL DISTRIBUTION OF COMPLAINTS RECEIVED BY THE GSE





Box 3.1. Examples of Project-Related Grievance Resolution by the GSE

Examples of complaints received by the Georgian State Electrosystem's Grievance Mechanism (GSE's GM) about the Akhaltsikhe-Batumi Transmission Line Project are outlined below.

In 2020, project-affected parties in the Skhalta section raised **a collective concern regarding the perception that the transmission line's electromagnetic field (EMF) presented risks that could endanger their health, agriculture, and the environment in general.** The GSE adopted a multipronged approach in response.

First, the GSE reiterated that the project was being planned and implemented in accordance with national legislation, World Bank requirements, and all applicable international regulations and recommendations set up by the World Health Organization.

In addition, the GSE worked closely with community liaison officers and developed a partnership with the nongovernmental organization EcoVision to elaborate an information and awareness-raising campaign for project-affected parties. The program included educational sessions for teachers and local communities; a "transmit energy" campaign for students, including informational meetings, paintings, and a video competition; the distribution of educational resources for children, e.g. comic books and age-appropriate leaflets; and an invitation to project-affected parties to participate in EMF-level measurements at various locations, such as around project sites directly under transmission lines, at the nearest substation, inside their own homes, and near refrigerators, computers, televisions, and other electrical items. This cooperation helped convince project-affected parties that all norms were being observed, giving them more confidence of their personal safety.

While the Covid-19 pandemic slightly delayed these activities, which were supposed to have begun in the fall of 2020, they nevertheless appear to have yielded positive results, convincing project-affected parties of the low risks associated with the EMF radiation caused by overhead lines outside the safety/buffer zones. Furthermore, this experience led to the GSE proactively communicating about this issue with project-affected parties in other municipalities—an upstream communication effort that seems to have effectively reduced fears and enhanced understanding of the project's impact.

In February 2021, the GSE received a **grievance from a project-affected person with a plot of land, real estate, and perennial cultures situated inside the overhead line protection zone.** The complainant refused to sign the servitude agreement^a that was proposed in the resettlement action plan but instead requested a full relocation. The GSE's social affairs division submitted this complaint to the Grievance Redress Commission. After discussion, members of the commission decided to satisfy the request. The GSE communicated the resolution to the complainant who expressed satisfaction with the outcome.

In February 2021, the GSE received a **verbal grievance from a complainant whose plot of land had been impacted by the transmission line project.** A particular tower located near the complainant's house was contributing to a landslide. The case was submitted to the GSE's Grievance Redress Commission, which decided that a relevant working group should gather additional information and send a team to the location to investigate. Based on this research, the team concluded that the tower did indeed need to be reinforced.

a. A servitude agreement is specific form of land expropriation that allows investors to use the public interest as a means of gaining access to other people's lands while the owners retain ownership of them.



Photo 3.3. GSE’s brochure about the grievance mechanism

As figure 3.2 illustrates, a much larger proportion of grievances are submitted by men (83 percent) than by women (17 percent) possibly because men are twice as likely as women to be documented owners in Georgia, and 1.4 times as likely as women to be documented owners of agricultural land (see Joshi and Martinez 2017). Other potential contributing factors are sociocultural norms and stereotypes, such as the much stronger representation of men in professions linked to the project, including engineering, construction, and energy, and the underrepresentation of women in local government, which could explain their being less willing than men to approach local municipality representatives with feedback (ADB 2018).

Achievements

The progress made toward strengthening the GSE’s GM since November 2019 is summarized below.

Communications regarding the GM have been enhanced.

The PIU developed and disseminated communication materials to raise community awareness of the GM, including a general brochure about the projects with a frequently-asked-questions

section based on issues that emerged out of consultations and a specific brochure that provides information about the GM in simple, understandable language with illustrations and photographs to ensure its universal accessibility (photo 3.3). In addition, in January 2021, the GSE’s website added a page outlining the GM’s basic functioning and various channels for submitting grievances.

Written guidance was prepared by the PIU GM focal point for community liaison officers and local staff. This guidance explains the procedures surrounding project-related activities, timelines, and required actions, and provides detailed information about the GM, including how contractors should address worker grievances and how the project will address GSE staff grievances.

The GSE trained community liaison officers and field staff.

The relevant topics covered in the training include the GM, communications, implementation of the resettlement action plan, and land registration. In addition, the GSE now holds weekly meetings to address any social issues that arise.



Box 3.2. Estimated Cost of Activities for Grievance Redress in the Georgia Energy Supply Reliability and Financial Recovery Project

The costs associated with GM-related activities for the GSE’s Georgia Energy Supply Reliability and Financial Recovery Project are outlined in table B3.2.1. In addition, the stakeholder engagement budget presented in the project’s stakeholder engagement plan foresees the hiring of five community liaison officers—one for each of the

project-impacted municipalities—at a cost of US\$500 per month. The total cost over a five-year period is US\$150,000, with an additional US\$50,000 budgeted for travel-related costs. While these budget estimates are specifically tailored to the Georgian context, they may serve as a useful benchmark for other projects.

TABLE B3.2.1. COSTS FOR GM-RELATED ACTIVITIES FOR THE GEORGIA ENERGY SUPPLY RELIABILITY AND FINANCIAL RECOVERY PROJECT

| Grievance Redress Activities | Quantity | Unit Cost (US\$) | Frequency Per Year | Total Cost (US\$) | Remarks |
|--|----------|------------------|--------------------|-------------------|--|
| Communication materials (e.g., pamphlets and posters) | 5,000 | 0.5 | 2 | 5,000 | |
| Guidebook/manual | 500 | 10 | 1 | 5,000 | |
| Suggestion boxes for every municipality and village | 30 | 50 | 1 | 1,500 | |
| Management information system/database | 1 | 20,000 | 1 | 20,000 | Included in procurement plan |
| Training of municipal-level grievance redress committees | 5 | 100 | 5 | 2,500 | One training per year in each municipality |
| Internal training for GSE and contractor staff | 1 | 500 | 5 | 2,500 | One training per year |
| Contingency (10 percent) | | | | 3,650 | |
| Subtotal | | | | 40,150 | |

GM = grievance mechanism; GSE = Georgian State Electrosystem.

Source: GSE 2019: 24.



The PIU made efforts toward minimizing the risk of incidents related to gender-based violence (GBV), sexual exploitation and abuse, and sexual harassment. For example, the PIU created GBV-related communication materials to raise awareness, and the World Bank conducted a GBV-related training/information session for relevant PIU staff and representatives of all GSE departments.

Areas for Growth

Based on the activities enumerated in its November 2019 GM action plan that have yet to be implemented, areas that the GSE could pursue to further enhance its GM are discussed below.

Diversify the approach to communicating about the project.

The potential of short videos to enhance communications about projects could be explored, for example, as could cooperation with local and central media outlets to increase awareness of project activities among affected parties. Coordinating with the GSE's public relations department to utilize their outreach channels could prove beneficial as well.

Improve grievance recording, disaggregation, and analysis.

The relevant spreadsheet does not include a detailed description

of the resolution for each grievance nor the complainants' level of satisfaction with the overall grievance handling process. The number of days between the receipt and acknowledgment of the complaint and the number of days between the receipt and resolution of the complaint is not automatically calculated. Improving the categorization of entries and the ability to filter them by uptake channel would allow a more nuanced analysis.

Produce a training manual. Such a tool could enhance the capacity of multiple actors in the GM value chain, both at the local and headquarters levels, and enumerate the specific procedures for various types of grievances.

Develop a GBV training module. This could help train workers on the code of conduct and raise community awareness of this topic.

Use technology to enhance the quality of grievance redress. The use of smartphones and tablets could be considered for data collection and grievance validation purposes. And developing a grievance management information system could decrease the time spent writing reports for every grievance and allow field staff and municipal authorities to enter data into the database directly.



Roads Department



In coordination with the Ministry of Regional Development and Infrastructure, the Roads Department implements major road infrastructure development projects and maintenance measures for international and domestic roads. The Roads Department's grievance mechanism (GM) was set up based on definitions put forth in the relevant projects' resettlement action plan, a document required for all World Bank-financed projects triggering Operational Policy 4.12 on Involuntary Resettlement.¹

An Overview of the Roads Department's Grievance Mechanism

Uptake channels

- ✓ Grievance boxes attended to once or twice weekly in the vicinity of construction sites, which the civil works contractor is responsible for setting up
- ✓ 24/7 hotline: +995 32 2 31 30 76
- ✓ Resettlement unit hotline: +995 32 2 31 30 76 (34-08), 9:00 a.m.–6:00 p.m.
- ✓ Local municipal representatives (e.g., head of municipality)
- ✓ Project managers implementing resettlement action plans, environmental and social teams of civil work contractors, and engineering teams
- ✓ Environmental, social, and registration division managers of the Roads Department
- ✓ Facebook: <https://www.facebook.com/georoad.ge/>
- ✓ Email: info@georoad.ge

Architecture

There are two dedicated focal points for complaints involving gender-based violence, sexual exploitation and abuse, or sexual harassment: the PIU's GM focal point (a woman) and a female lawyer who works closely with highway civil work contractors.

These focal points are aware of a partner NGO operating across the country to whom they may refer cases and are cognizant of the importance of dealing with cases confidentially. At the time of this writing, no GBV-related cases had been received. During weekly site visits, the PIU's GM focal point always asks female workers at construction sites and work camps about their experiences and lets them know that they can raise GBV-related grievances with her directly.

At the PIU level, the Grievance Redress Commission, set-up over ten years ago and guided by specific terms of reference, convenes at least once a month to discuss and resolve cross-sectoral grievances and any grievances that have escalated to it. This commission includes the head of the Roads Department and all deputy heads, including the legal, design, and roads construction division, among others. Consultants working on resettlement action plans and environmental and social management plans, design companies, and others can be invited to participate in the commission.

Registration of grievances

The PIU's GM focal point, who is based in the environmental and social issues division, coordinates the recording, processing, and resolution of grievances, and maintains a spreadsheet database of grievances. All actors receiving grievances must report them to the PIU's GM focal point, except contractors, who report to the supervision engineer who then informs the PIU's deputy department head and the environmental and social issues division team in a monthly summary report. The PIU's GM focal point then consolidates these reports in an electronic format.

The PIU uses an e-document system for formal letters and communication. This online system relies on creating individual case files and scanning and uploading printed letters and relevant documentation to each file. Once a new case file is

1. For more information on the World Bank's Operational Policy (OP) 4.12, see <https://policies.worldbank.org/en/policies/all/ppfdetail/1584>. While OP 4.12 has been replaced by Environmental and Social Standard 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) since the entry into force of the Environmental and Social Framework in October 2018, projects approved prior to this date still apply OP 4.12.



created, the deputy head of the Roads Department receives a notification and assigns it to a person in the relevant department who will oversee the complaint process through its resolution.

Categorization of grievances

The grievance log clearly captures the following data for most complaints: name of road segment linked to the grievance, whether the grievance was submitted in writing or verbally, name of the community from which the complaint emanated, the type of complaint, a description of the complaint and proposed resolution, the date the complaint was received, the date it was resolved, the status of the complaint, and the number of days the complaint was open.

Grievances are assigned to one of the following categories: (1) compensation rate; (2) crop compensation; (3) damage to infrastructure/assets; (4) disturbance: noise/vibrations /dust; (5) health, safety, and environmental concerns; (6) inclusion in land acquisition and resettlement plan; (7) inclusion in resettlement action plan; (8) registration/ownership status; (9) restriction or loss of access; or (10) other.

Investigation and resolution of grievances

Simple grievances (e.g., regarding the removal of stones or excess water during road construction) can often be resolved quickly by the civil works contractor. If the civil works contractor cannot solve the issue independently, the supervision engineer and PIU become involved. If external expertise is required to resolve the complaint, an independent expertise bureau can be included in the investigation process (for example, to examine cracks in houses). After such a bureau shares its findings, the Roads Department presents the investigation's conclusions in a final document, which is then scanned and attached to all other relevant materials in the e-document system.

The proposed grievance resolution is sent in writing to the complainants and must be delivered by hand by the postal service with proof of receipt. If the postal service cannot reach the complainant, the letter is returned to the Roads Department, and the project manager must then deliver it to the complainant. Grievances at the local level must be resolved within 7-10 days, and those escalated to the Roads Department must be resolved within 10 days; the total maximum period allowed for the resolution of a grievance is 30 days.

Box 3.3. Example of Project-Related Grievance Resolution by the Roads Department

During an upgrade to a road section between the Agara and Gomi Bypass as part of the Fourth East-West Highway Improvement Project, implemented by the Roads Department, Agarebi village residents complained about a permanent restriction of access to pastureland that significantly reduced the number of cattle in their village—and the related income. According to a representative of Khashuri's mayor, before the start of the highway construction, there were about 90 livestock, later dropping to only 35. In response, the Roads Department proposed a livelihood restoration approach to compensate affected households by providing sufficient compensation to restore their livelihoods and economically empower them. The compensation package elaborated for each household

was based on official statistical data on livestock and veterinary status provided by the Scientific-Research Center of Agriculture in the Shida Kartli region (Khashuri municipality), official data and prices, and the estimated loss of livestock calculated over a one-year period. In August 2020, the determined amount—GEL 6,143.97 (US\$1,905)—was transferred to each of the 32 affected households, regardless of whether they had encountered a full or partial loss of cattle. Later that month, and again in October 2020, the municipality of Khashuri shared additional information with the Roads Department, identifying and confirming additional affected households who then also received the agreed compensation amount.



3. DIAGNOSTIC OF PIU GRIEVANCE MECHANISMS



Photo 3.4. Construction of Rikoti Pass Road



Photo 3.5. Road rehabilitation in the community of Gremiskhevi

Communications

Information about the grievance uptake channels and details about where grievances can be filed are communicated to the public during consultations. There are printed GM forms available at municipal-level information desks. Municipal halls display flyers with general project information and keep onsite hard copies of the resettlement action plan, including annexes.

Signs and banners with the GM focal point's contact information are posted and grievance boxes are installed at contractors' camps. The Roads Department's hotline number and website address are posted on all construction site billboards.

Monitoring and Evaluation of Grievance Data

Between 2015 and 2022, the Roads Department's GM received 60 complaints about six World Bank-financed projects concerning the following road segments: Agara-Gomi-Zemo Osiauri, Khidistavi-Ateni-Boshuri, Bakurtsikhe-Gurjaani Bypass, Tianeti-Akhmeta, Zemo-Osiauri chumateleti F0, and Chumateleti-Khevi.

The number of grievances received by the Roads Department every year is illustrated in Figure 3.4. Figure 3.5 shows the number of complaints received about each road segment; and figure 3.6 illustrates the verbal versus written complaint

submissions (23 and 77 percent, respectively). Figure 3.7 demonstrates how most received complaints are linked to damage to infrastructure or assets (43 percent), followed by restriction or loss of access to land (18 percent) and crop compensation (12 percent).

FIGURE 3.4. NUMBER OF GRIEVANCES RECEIVED BY THE ROADS DEPARTMENT BY YEAR

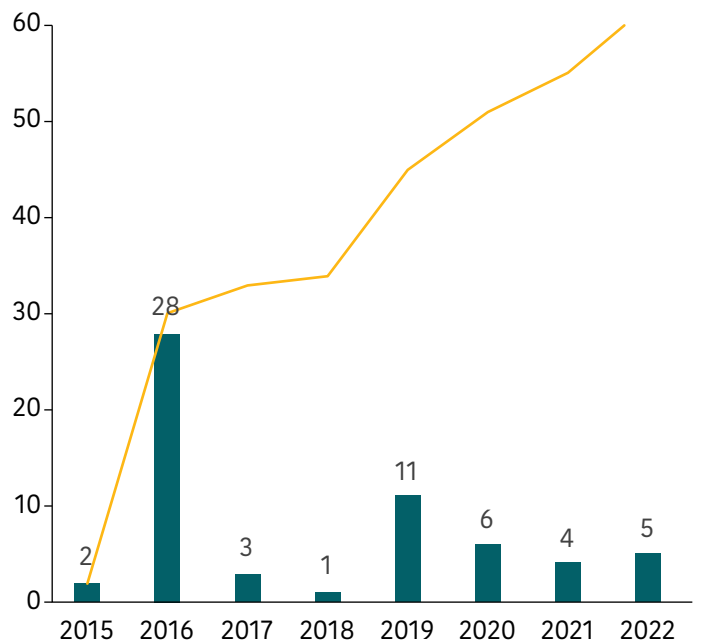




FIGURE 3.5. NUMBER OF COMPLAINTS RECEIVED BY THE ROADS DEPARTMENT BY ROAD SEGMENT

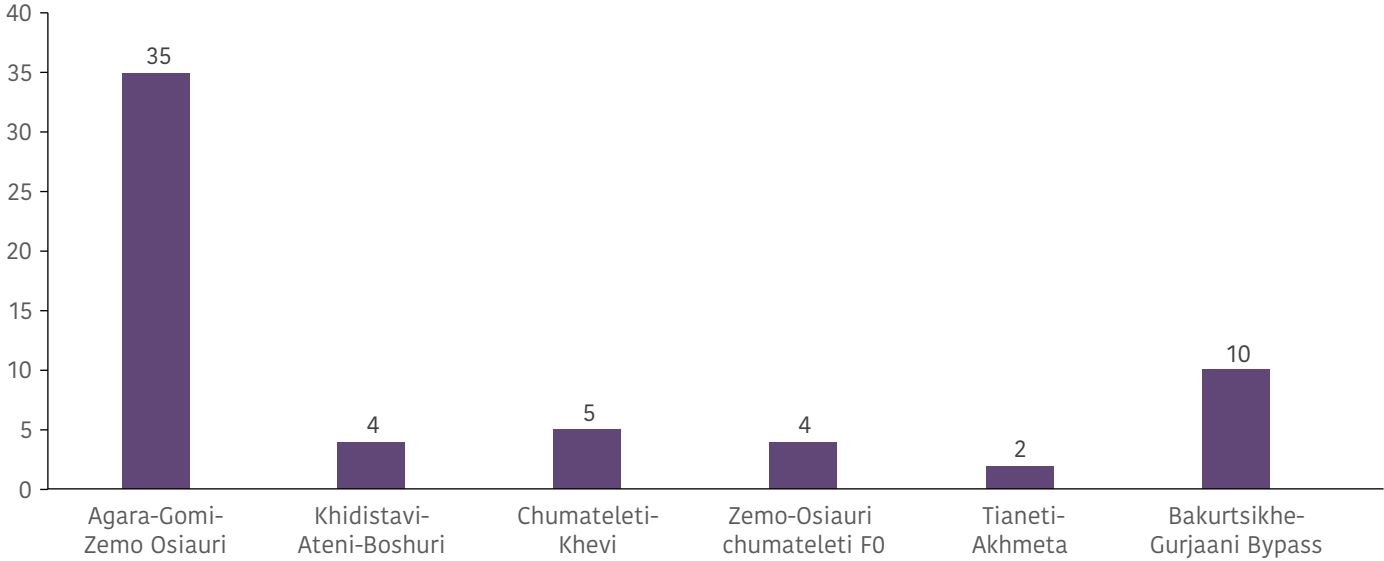


FIGURE 3.6. DISTRIBUTION OF VERBAL AND WRITTEN COMPLAINTS RECEIVED AND RECORDED BY THE ROADS DEPARTMENT

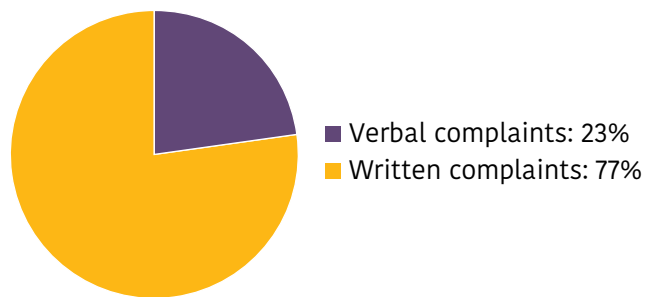
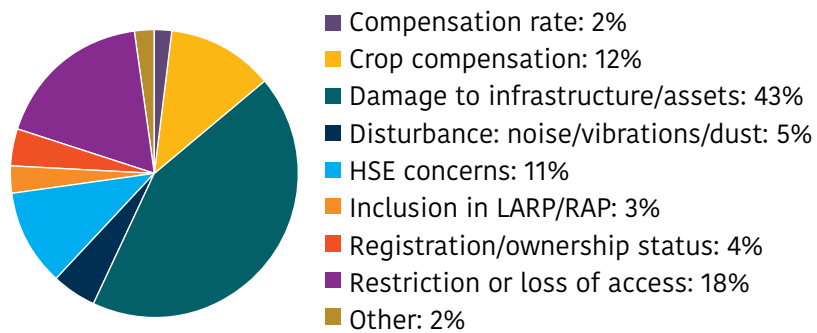


FIGURE 3.7. COMPLAINTS TO THE ROADS DEPARTMENT BY TYPE



HSE = Health, Safety, Environment LARP = Land Acquisition and Resettlement Plan RAP = resettlement action plan.



3. DIAGNOSTIC OF PIU GRIEVANCE MECHANISMS

Achievements

The progress made toward strengthening the Roads Department's GM since November 2019 is summarized below.

An internal GM policy and manual were prepared. They cover all projects implemented by the Roads Department and include a summary of good practices. Intended for staff and consultants of the Roads Department, the policy outlines ways to deal with verbal and written complaints, the timeline for internal and external responses, the categories of grievances, and project managers assigned for each project. At the time of this writing, the policy and manual were under management review.

Communications about the GM were developed. Leaflets, flyers, and posters were created and community meetings held that included information about the GM (see photos 3.6 and 3.7).

Various grievance logs were consolidated. The separate grievance logs that had existed for different donors, including the World Bank, the Asian Development Bank, and the European Investment Bank, were reorganized and consolidated into one spreadsheet.

Capacity-building trainings were conducted. Despite the Covid-19 restrictions, which limited in-person meetings to a maximum of 12 people at one time, trainings that included information about the GM were carried out in 2019 and 2021 for contractors, supervisors, local staff, and project workers.

A new management information system was developed. A private company developed the system for the Roads Department; its beta version was being tested at the time of this writing. The system will allow for the inclusion of legal and financial logs, as well as environmental and social logs for projects financed by international donors. Civil works contractors can also provide inputs. A color-coding system will flag issues that are not being handled in the allotted timeframe to the Roads Department's deputy chairman. The PIU and the World Bank will have digital access keys allowing for a real-time check of open and closed grievances related to their projects.



Photos 3.6 and 3.7. Meetings held by the Roads Department with local communities in 2020

GBV prevention strategies were implemented. To prevent gender-based violence, sexual exploitation and abuse, and sexual harassment, a separate GBV incident communication document was created, and GBV trainings and information sessions were conducted for PIU staff and local communities. A GBV module on the code of conduct for workers was included in trainings and in awareness raising sessions targeting local communities. Special guidelines for cases of gender-based violence, sexual exploitation and abuse, and sexual harassment have been developed and distributed to highway project contractors. The PIU's social and environmental safeguard specialists also developed and provided special training to women employees in workers' camps.



Efforts were made to ensure the quality of grievance resolution. Periodic spot checks were conducted in 2020, and feedback was collected periodically on the experiences of complainants with the GM as well as their level of satisfaction with the outcomes.

Areas for Growth

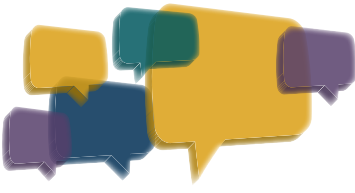
Based on the activities enumerated in its November 2019 GM action plan that have yet to be implemented, areas that the Roads Department could pursue to further enhance its GM are discussed below.

Enhance GM processes. Examples include improving the practice of sending written acknowledgments to GM users upon receipt of written grievances and collecting feedback from complainants about their experiences and level of satisfaction in a more systematic manner.

Improve the categorization, monitoring, and analysis of grievance data. Richer grievance data analysis could be achieved by expanding the granularity of grievance data

collection. Examples include capturing the uptake channel; logging information about the complainant's gender, disability status, and age cohort; and more consistently exploiting existing data points by systematically calculating grievance resolution timelines.

Expand GM-related communications. Options for publicizing the GM among affected communities include making information and grievance forms—and possibly suggestion boxes—widely available in municipal offices and public spaces and coordinating with the public relations department to share information about the GM on the Roads Department's website, its Facebook page (which has about 42,000 followers), and YouTube channel (which has about 200 subscribers). Information about the GM could also be presented on the website in a more straightforward way. There is information about resettlement action plans but there is not a dedicated section on grievance redress or any detailed information on the scope of the GM. The website could also feature an annual report on grievance redress, providing an overview of progress made, grievance statistics, and other issues.



Municipal Development Fund



Established in 1997, the Municipal Development Fund (MDF), under the supervision of the government and the Ministry of Regional Development and Infrastructure, cooperates with all the large investment banks and financial institutions operating in Georgia. The MDF aims to enhance the institutional and financial capacities of local self-governmental bodies, invest in local infrastructure and services, and improve the economic and social well-being of the local population. The MDF implements infrastructural projects such as urban renovation, arrangement of infrastructure at tourist and cultural heritage monuments, construction and rehabilitation of schools and kindergartens, and improvement of infrastructure to make it resilient to natural disasters. The MDF's GM relies heavily on cooperation with municipalities due to the nature of the project activities—primarily small municipal-level infrastructure development.

An Overview of the MDF's Grievance Mechanism

Uptake channels

- ✓ Email: feedback@mdf.org.ge
- ✓ Letter addressed to municipal representatives or the MDF
- ✓ Grievance boxes with grievance forms, accessible to the public in the vicinity of construction sites (these boxes are checked daily by the contractors and supervision contractors, to see if any grievance has been received, and can also be opened/checked during unscheduled site visits by persons with the relevant authority)¹
- ✓ A designated GM focal point for each municipality, often the head of the municipal infrastructure unit or the mayor, who serves as the public's primary contact for feedback, questions, and concerns

- ✓ The MDF's beneficiary relations specialist—also its GM focal point—whose direct phone number continues to be widely communicated (calls made to the MDF's main number are redirected).

Architecture

Depending on the complexity of the received grievance, local municipality representatives can try to solve the issue on their own or in cooperation with the contractor, or they can involve the MDF's GM focal point in the investigation and resolution process.

Registration of grievances

After receiving a complaint, local municipal representatives contact the MDF directly, keeping a grievance log (a spreadsheet) that can be shared with the MDF upon request. An acknowledgment of the receipt of the complaint must be sent within five working days. At the contractor level, the company's appointed grievance focal point inspects and responds to the submissions filed via grievance box and maintains a log of all complaints and their resolution. The log is shared monthly with the engineer appointed by the MDF/supervision company, which is obliged to notify superiors as appropriate.

Categorization of grievances

Grievances are filed under one of the following categories: access, additional works, changes in project design, compensation, damage, noise, quality of work, request for information, slow progress of the works, and appreciation.

Investigation and resolution of grievances

The resolution process typically includes site visits and additional meetings with the complainants or relevant actors with a view toward collecting all needed information and proposing an adequate solution. In accordance with

1. It is the contractor's responsibility to arrange a complaint box on the construction site. Complaints submitted through this channel can be anonymous. Because World Bank-financed projects fall under the old operational policies, a separate workers' GM is not required.



Georgia's Administrative Code, the time between the receipt and resolution of a grievance should not exceed 60 days. Complainant satisfaction with the outcomes is collected informally by the MDF's GM focal point following the closure of the process, whether in person or by phone.

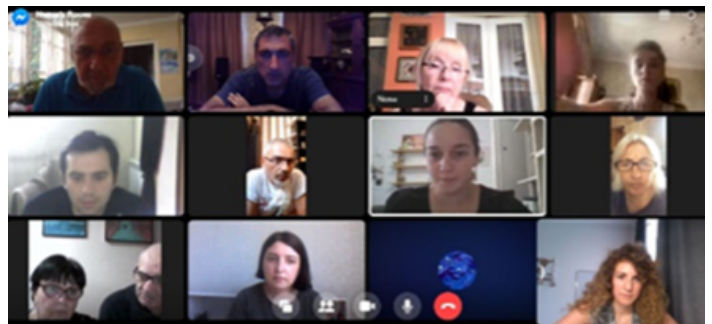
Communications

The MDF PIU disseminates information about the GM through initial public consultations convened during project preparation (see photos 3.8–3.10). Slide presentations are used during these consultations, and brochures that include contact information for municipal GM focal points are circulated among project-affected people. At the subproject level, information banners and signboards with relevant contact information, such as the GM's phone number and email address, are posted at construction sites.

Monitoring and Evaluation of Grievance Data

The MDF's GM received a total of 29 entries for issues related to World Bank-financed projects from 2017 to 2021: 14 in 2017, 2 in 2018, 11 in 2019, 1 in 2020, and 1 in 2021.

Following the technical assistance mission, the MDF's GM focal point revised the complaint log to provide more granular data on entries received by the GM and to allow for the easy extraction of relevant information. For example, the log now makes it simple to determine that over the 2017–21 period, the average time between the receipt and acknowledgment of a complaint was 3.7 days, and the average time between receiving and resolving a complaint was 15.4 days. The revised log also shows that most (34 percent) complaints are received verbally, followed by via phone (28 percent) and mail (28 percent); email accounts for only 10 percent (figure 3.8). Interestingly, the complaint-related data reveals that over half (52 percent) of complainants are men, while only 24 percent are women; the remaining 24 percent involve group complaints (figure 3.9).



Photos 3.8–3.10. Public consultations conducted by the MDF In person (prior to the Covid-19 pandemic) and online



Box 3.4. Examples of Project-Related Grievance Resolution by the MDF

In 2019, a landowner and contractor in Telavi Municipality could not agree on the arrangement of a sidewalk as part of a local infrastructure project focused on the rehabilitation of a road and gas supply routing. The landowner was adamant that construction materials should not pass through his yard and that his fence had been damaged by the construction works. The Municipal Development Fund (MDF), who was implementing the Second Regional and Municipal Infrastructure Development Project that the sidewalk project was under, mediated and proposed a technical engineering solution that suited both parties. A follow-up meeting was conducted with the complainant a month later, who confirmed that he was satisfied with the resolution and had no further complaints or concerns about the project.

In February 2021, a female resident of the municipality of Gori voiced concerns about the type of drainage channels being used for the Samepo road rehabilitation project: she wrote two letters asking why closed drainage channels had been chosen rather than open ditch drainages and requesting a change in project design. The MDF called the resident to inform her about the stage and process of the project and organized a site visit that included the mayor, project manager, project engineer, contractor, and the supervision company to explain the reasons behind the choice and why changes could not be made, notably due to engineering concerns. The resident later wrote a letter saying she was satisfied with the detailed explanation provided.

FIGURE 3.8. COMPLAINTS TO MUNICIPAL DEVELOPMENT FUND BY UPTAKE CHANNEL

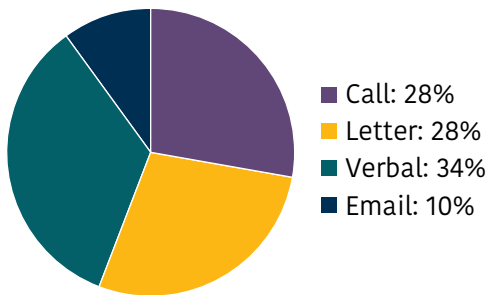
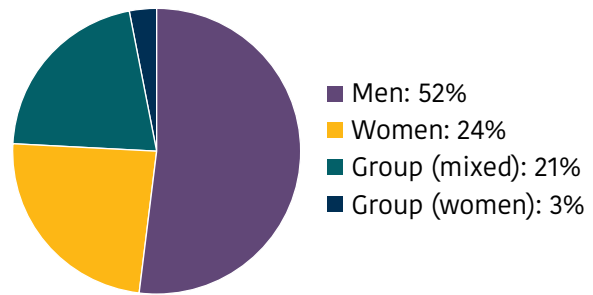


FIGURE 3.9. GENDER DISTRIBUTION OF COMPLAINANTS TO MUNICIPAL DEVELOPMENT FUND





Achievements

The progress made toward strengthening the MDF's GM since November 2019 is summarized below.

The grievance log was improved. The log was revised to better record, categorize, and analyze all types of inputs received by project-affected parties. For example, the revised log distinguishes between types of received feedback (e.g., grievance, inquiry, appreciation, and request). The log is now capturing data about a complaint's date of receipt, acknowledgment, and resolution. Another improvement is the inclusion of the complainant's disability status. Finally, the grievance log now consolidates inputs received by project-affected parties for all donor-financed projects.

A grievance manual was drafted. The GM focal point developed a grievance manual that includes written guidance on GM standards and procedures for MDF staff, municipal focal points, the Grievance Redress Commission, contractors, and the supervision company. The manual must be validated by the MDF's unit head before it can be shared with civil contractors, the supervision company, and project-affected parties at future consultations.

Anonymous grievance boxes were set up. To improve the accessibility of the GM and reduce fears of retaliation, complainants can now submit their grievances anonymously using grievance boxes located at the MDF and in project-affected municipalities.

Areas for Growth

Based on the activities enumerated in its November 2019 GM action plan that have yet to be implemented, areas that the MDF could pursue to further enhance its GM are discussed below.

Create a separate GM webpage on the MDF's website.

The webpage should include detailed information about GM procedures, steps, channels, and timelines; there should be an online grievance receipt form; and an annual report on grievances should be posted. Such a dedicated webpage is likely to be included in a broader redevelopment of the MDF's entire website, which the Ministry of Regional Development and Infrastructure would need to validate.

Engage in additional capacity-building. Capacity-building opportunities have been severely restricted by the Covid-19 pandemic. As a result, the PIU's beneficiary relations specialist and gender and social specialist have not yet been able to organize in-person trainings for the local representatives and mayors of Georgia's 63 municipalities on issues such as the GM, gender, and environmental and social management plans.

Conduct GM trainings for contractors and supervisors. Such trainings were postponed due to pandemic restrictions. However, once the new GM manual is validated, it will be presented to the supervision company and, prior to the commencement of any new subproject, the contractors will be trained by the supervision company, including on GM-related procedures. The supervision company will be required to issue a report about the GM-related training for contractors in its monthly monitoring table, which it submits to the PIU.

Develop new communications. Subject to the MDF management's approval of the draft GM manual, new communication materials will be produced, such as brochures with detailed information about GM procedures, steps, channels, and timelines.



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