



Promoting Social Inclusion and Self-Reliant Livelihood Activities in Armenia

GRIEVANCE REDRESS MECHANISM

Yerevan

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ACRONYMS

AASW	Armenian Association of Social Workers
BFM	Beneficiary Feedback Mechanism
GRM	Grievance Redress Mechanism
E&SS	Environmental and Social Specialist
FBP	Family Benefit Program
JSDF	Japan Social Development Fund
MLSA	Ministry of Labour and Social Affairs, RA
M&ES	Monitoring and Evaluation Specialist
PAP	Project Affected Person
PB	Project Beneficiary
PD	Project Director
PM	Project Manager
PSISLA	Project Acronym
WB	World Bank

DEFINITIONS

Project Beneficiary: The project is expected to reach about 11,200 beneficiaries in five marzes of Armenia: Armavir, Ararat, Shirak, Lori, and Kotayk. The project beneficiaries will consist of two groups: 1) members of selected FBP recipient households who will receive (i) self-employment support or (ii) access to other social assistance benefits or services according to their needs as assessed by social case managers; and 2) social workers trained by the project.

Project Affected Person: Any person who was directly or in-directly involved in the Activities of the Project, including but not limited to Project Beneficiaries.

Complaint: The Complaint is a verbal or a written statement or an expression of displeasure which was arisen as an impact of project activities.

Grievance: A grievance is a statement about an action, impact or effect arising from the Project activities that adversely affect the rights, health and/or well-being of an affected person or people. Grievances may be raised verbally or in writing but must be reported using the Grievance Report Form and registered in the Grievance Register.

Grievance Redress Mechanism: The grievance redress mechanism is a locally based, project-specific procedure to deal with and resolve complaints and grievances and thus enhance project performance standards in terms of social and environmental management.

ABOUT THE PROJECT

“Promoting Social Inclusion and Self-Reliant Livelihood Activities in Armenia” Project (2020-2023) intends to leverage a comprehensive social case management approach to target the most vulnerable and marginalized populations in Armenia through addressing the barriers for self-reliant income for poor and vulnerable groups and promoting their entrepreneurship activities. The project is generously supported and funded by the Government of Japan through the Japan Social Development Fund (JSDF) and is administered by the World Bank (JSDF Grant No. TF0B2613).

Project Development Objective (PDO) is to increase access to social assistance benefits and services and provide self-employment support for about 11,000 extremely vulnerable individuals in Armenia.

Geographical Coverage: Project activities will be implemented in 5 marzes (provinces or regions) of Armenia: Armavir, Ararat, Shirak, Lori and Kotayk, which were chosen in consultations with MLSA based on their main social-economic characteristics and state priorities regarding the regions.

Project beneficiaries: The project beneficiaries will consist of two groups:

- 1) members of selected FBP recipient households who will receive
 - (i) self-employment support (5,000 individuals) or
 - (ii) access to other social assistance benefits or services according to their needs as assessed by social case managers (6,000 individuals);
- 2) social workers trained by the Project (200 state and non-state social workers).

Project Guiding Principles: The main guiding principles of the Project include:

- Targeting the poorest and most vulnerable FBP beneficiaries,
- Impartiality,
- Competitive and transparent allocation of funds,
- Environmental and social sustainability,
- Risk mitigation,
- Financial and operational sustainability.

Project Dimensions:

- Activation.
- Inclusion/involvement of households experiencing the highest rates of marginalization and extreme poverty.
- Reduction of child poverty.

Special attention in all dimensions will be paid to households with a disabled family member.

Project Components:

Component 1: Development and implementation of a pilot counseling program will support the country's efforts to design and implement a structured social case management approach that can serve as a tool to enhance the internal cohesion of services and benefits in the country's social protection and labor system.

Component 2: Capacity building and entrepreneurship support will pilot the program consisting of business training and advisory services and provision of small sub-grants to promote self-employment and boosting business activities, aiming at increasing incomes and therefore livelihood state for poor and vulnerable beneficiaries of Family Benefit Program (FBP) in five marzes.

Component 3: Project management and administration; monitoring and evaluation; and knowledge dissemination will ensure the effective implementation of the Project.

INTRODUCTION TO THE PROJECT GRM

The Project GRM as a project based internal procedure to deal with and resolve complaints and grievances is an integral part of the Project Management System and aims to ensure good environmental and social practice of the Project activities during the whole Project implementation cycle.

As an addition to the outreach campaigns, public consultations and awareness raising activities conducted in the frames of the Project, the Project team will run the GRM to ensure effective and needs based implementation of project activities and also, facilitate the prevention and early identification of any risks related to the Project Activities, which can have negative or harmful affect on project beneficiaries or any project affected person.

The data gathered through the operation of GRM will be used not only to address the complaints and grievances arisen during the course of Project implementation, but also to contribute to the continuous improvement of the Project performance through the analysis of trends and lessons learned.

The flow chart visualizing the step by step GRM procedure is presented in Annex 2.

The main principles of the BFM and GRM include:

Accessibility: In the frames of the Project a clear and understandable GRM is established which gives the PAP to use different and affordable means of communication to apply with any appeal.

Transparency and accountability: The applicants are given an opportunity to get acquainted with the procedure and timeframe of the GRM for each stage and also the possible types of results both before applying and during the application procedure.

Legitimacy and Fairness: All the claims are being recorded and reviewed by the Project team following the organizational norms and national legislation and are ensuring the protection of the rights of applicants and fair decision making through the multi-tier system of the claim review. All the project affected persons are free to go to the court at any phase of the GRM.

Cultural Appropriateness: GRM is designed to take into account specific cultural attributes of the target marzes and communities as well as traditional mechanisms for raising and resolving issues— to ensure that the concerns of significantly different groups and subgroups are received and addressed.

The primary objective of the GRM is that all complaints and grievances will be resolved as quickly as possible, following, and keeping above mentioned principles.

FRAMEWORK AND PROCEDURE OF THE GRM

Intake and Record:

1. Project affected persons (PAP) dissatisfied with project-related activities can give their feedback or convey complaints at any stage of the process. Complaints can be made in writing, verbally in a face-to-face manner at the AASW office or through one of this channels:
 - Project Call Center: (+374) 11 601 600
 - Viber/WhatsApp: (+374)95 605 600
 - Project Website (Special section for the complaints and feedbacks): psisla.aasw.org
 - Project Facebook Page: facebook.com/psisla
 - E-mail address: help@aaaw.org
 - Special Complaint/Feedback Boxes at the Project Sites (during some Project Activities)
 - Regular Post Mail (AASW postal address): K.Ulnetsu 64, Yerevan, Armenia
2. The first focal point for the GRM is the Project Assistant, who is in charge of receiving, screening, recording (in the Project MIS) and documenting all the complaints. The Project Assistant reports all the recorded cases to the PM, Monitoring and Evaluation Specialist (M&ES) and Environmental and Social Specialist (E&SS) no later than during 1 day after the case registration. Cases received in written form will be recorded by the Project Assistant and then reported to M&SS within 1 workday.
3. After the case is recorded by the Project Assistant and reported, the screening of the complaint by the Project E&SS begins. The E&SS establishes the eligibility of the received complaint by the following criteria: a) the complainant is identifiable and has provided a

name and contact details, b) the complainant is affected by the project, c) the complaint has a direct relationship to the project, d) the issues raised in the complaint fall within the scope of the issues that the GRM and the Project Team is mandated to respond.

4. Anonymous complaints are not being registered. At the same time, they should be reported to PM and based on the circumstances can be reviewed to prevent any risks related to Project operation.
5. All the complaints are being registered regardless of their eligibility status by E&SS (or by M&E if E&S is not available). If the complaint is not eligible, the complainant should be informed of the reasons.
6. Grievance Register/ Log: The project E&SS keeps the track of complaints in a Grievance Register, which at least contains the following information: reference number of the complaint, date of the complaint, name of the complainant/s, gender, national identification number/s, address of the complainant/s, summary of the complaint, the channel used for the complaint and associated documents, if exist, the eligibility of the complaint, including the reasons of non-eligibility, means of the notification to the Applicant, the actions made/passed to, status, closing date.
7. Grievance Register should be accessible for the PD, PM and M&ES. On a monthly basis, the M&ES should analyse the data recorded in the Register.
8. After the registration of the Complaint, the Complainant receives a confirmation that the grievance has been received and is under investigation with a complaint number, or other identifier, and a timeline for response.
9. In cases, when a complaint is received in person, it can be acknowledged and solved in place by the E&SS or the PM. If a more complex investigation is required, the complainant should receive an update explaining the actions required to resolve the complaint, and the likely timeline.

Review, Investigation and Resolution of Grievances

10. The case review is being processed by the E&SS under the guidance and support of the PM. Based on the need other members of the Project Team can be involved in the reviewing process to assist the PM in the final decision making. Case Review cannot take more than 5 working days after the registration.
11. All the registered complaints pass a further assessment to identify their significance, classified in terms of high, medium, or low levels based on its impact on both the complainant and the project. The assessment criteria include the following: a) severity of the problem, b) potential impact on the well-being of an individual or group, c) potential impact on the project, and d) public profile of the issue.
12. Investigations may include site visits and meetings to determine: the scale and impact of the grievance and what options there may be for appropriate responses or resolutions. Additional support or information may be gathered from any other sources in order to

describe the cause and effects of grievance more clearly, its level of urgency or severity and its relationship to PSISLA. The PM is authorized to contact the Complainant during the reviewing process, if any additional information or clarifications are needed for making a fair and relevant decision.

13. All complainants and/or users of the BF&GRM should be contacted by the PM within five working days of presenting a case to be informed of the final answer/resolution or regarding the status of the case. In special cases where a resolution cannot be provided in five working days (when more time is needed for additional information and involvement of other stakeholders, including MLSA) the complainants will be informed about the additional time required for their case, which according to the RA Law on Freedom of Information cannot be longer than one month.
14. Responses can be either oral or written, depending on whether the grievance was received orally or in writing. Regardless of its form, the claimant and the response should be registered.
15. The response at least should include the following information: a) acceptance or rejection of the complaint, b) if rejected, the reasons for the rejection and possible referrals, if any, c) if accepted, the next steps and timeframe for the resolution.
16. In the framework of the current Project the possible approaches to complaints resolution can include: a) mediation through local and traditional institutions and/or community-based organizations, b) direct negotiations and dialogue between the PAP and the relevant agency or agencies; c) facilitated negotiations through a third party; d) investigation of a complaint through review of documents, field investigation, and/or interviews of different parties; e) referrals to other judicial and administrative processes. Depending on the nature and the severity of the complaint/s, the PD and PM in consultations with the Project Advisory Expert Group should identify and decide on an approach for grievance resolution.
17. If the complainant is not satisfied with the response and/or solution provided by the PM in response to the case presented, then the complainant can apply to the PD who will provide a response within 10 days of the case being received. The PM and E&SS will be consulted to develop the final response.
18. The PD regularly provides information on received complaints and provides responses to AASW Project Advisory Expert Group and presents reports on received complaints during PISC meetings. The PD can ask the AASW Project Advisory Expert Group to provide feedback and if necessary, a Group session can be called to hear the case of PAP. The Regulations of the project advisory expert group is presented in Annex 1.
19. At any point, the PAP is entitled to go to any legal process according to national law, including court, in order to resolve the grievance. Once the Court opened a case, all the processes of the GRM are being stopped until the decision is being made. The Court decision is obligatory for both sides: the Applicant and the Project team/representative.

Close out and Follow up of Grievances:

20. A grievance is closed out when no further action can be or needs to be taken.
21. The grievance cannot be closed out, until the response has not been communicated with and approved by the Complainant.
22. If the Complainant is satisfied with the outcome, then the grievance is closed out and is being registered in the Grievance Register as Resolved case. The Complainant provides his/her written agreement as confirmation.
23. If the Complainant rejects or appeals twice with the same claim, then the closure status of the complaint is being recorded and entered into the Grievance database as unresolved. The case is regarded as unresolved if it has not been possible to reach an agreed resolution and the case has been authorized for close out by the Project Advisory Expert Group.
24. The grievance can be closed also in cases where the attempts to contact the Complainant have not been successful for 30 days following receipt of formal grievance. These cases are registered as abandoned.
25. The project team, specifically the first focal point, ensures maintenance of the grievance-related documents, reports and, if needed, facilitates arrangements for the field inspections to verify the authenticity and eligibility of the grievance reported.

Monitoring, Reporting and Evaluating a Grievance Mechanism

26. The PM with the support of the M&ES is responsible for tracking and monitoring the process of grievance redress and the implementation of the decisions made and of seeing that redress is granted to PAPs in a timely and efficient manner.
27. The PD and PM also have the responsibility for giving regular feedback to the Project Advisory Expert Group about the progress of the grievance redress process.
28. The monitoring includes the progress of implementation of grievance resolutions and the timeliness of grievance redress, follow up grievances to be sure they are attended to, and document details of complaints received and the progress in solving them.
29. The overall effectiveness and the impact of the GRM is being evaluated annually by the M&ES and the evaluation results are being used to improve the performance of the GRM and overall Project activities.
30. The Monitoring and evaluation of the GRM can be done both through the quantitative/statistical data analysis and qualitative methods, including interviews with and feedback from the PAPs involved in the GRM procedures.
31. The Information on GRM performance is being reflected in the Project Quarterly Progress Reports, Mid-term Review Reports and Final Project Reports.

Publicizing Grievance Redress Procedures

32. The E&SS under the overall guidance of the PM gives necessary instructions to all the Project Staff, including consultants, contractors on the GRM of the Project and illustrates to them the procedures and formats to be used including the reporting procedures.
33. The Project team, including consultants and contractors in the frames of their Project related responsibilities are in charge to inform the Project Beneficiaries and other PAP on the Project GRM and provide necessary explanations on the procedure to be used, if they wish to file a complaint.
34. The GRM will be available in Armenian and English both on the Project web platforms and project sites. Specifically, it will be published on the AASW webpage and FB page, the Project webpage and FB page, and also information sheets on the GRM (with relevant contact data) will be distributed to the PB during all the Project Activities, including but not limited to town-hall and community meetings, on-day seminars, trainings, trade fairs, consultancies, monitoring visits, etc. as a part of distribution materials.
35. The information sheet on the GRM, would be available in all the project sites, especially will be demonstrated in prominent and visible locations at the social service agency local offices.
36. The Information sheet will include information on the following: how to access the GRM, when (in which cases / eligibility) and how to make a complaint, procedure, and timeframes for the GRM, etc.
37. The Project team based on the needs can also use other available means to raise awareness about the Beneficiary Feedback & Grievance Redress Mechanism.

Project Call Center

36. The Project Call Center is established to:
 - a) Register all grievances and complaints from PAPs;
 - b) Establish effective communication mechanisms with beneficiaries and Consultants involved in Project implementation activities and working with beneficiaries.
 - c) Operative advisory support to project beneficiaries as per their request.
37. The Project Call center is available through a special phone number, e-mail address, Project Facebook page.
38. The Project Call Center will provide additional advisory support to beneficiaries. The delivery of these services will be organized and coordinated by the PIA and implemented both by selected local consultants (Business Consultants (trainers/coaches)) and service providers from local market (logistic issues, etc.).
39. Any calls requiring follow-up advice related to sub-grant implementation will be transferred to the Component-2 Coordinator, Component Consultant or business consultant (trainer/coaches) otherwise the call back will be ensured.
40. The Call Centre will function at AASW office at least one year after the Project closure.

ANNEX 1. Regulations of the project advisory expert group

1. The Project Advisory Expert Group (Expert Group) is a consultative body set up by the Council of the "Armenian Association of Social Workers" NGO (hereafter AASW) in the frames of "Promoting Social Inclusion and Self-Reliant Livelihood Activities in Armenia" Project (hereafter Project). The role of the Expert Group is to provide the Project team with advice and expertise and to support the quality assurance of the Project activities related to the social work.
2. The establishment of the Expert Group fully corresponds to the statutory mission, aims, and objectives of the AASW, particularly it directly relates to the following objectives: (1) Development of social work practice(AASW Charter, point 2.2.1); and (2) Support the implementation of the social protection system reforms in Armenia (AASW Charter, point 2.2.3).
3. The objectives of the Expert Group are:
 - provide an expert opinion (feedback) on project deliverables related to social work, case management, and other Project-related activities,
 - to provide social work professional unbiased advice concerning controversial situations and dilemmas (if any),
 - to discuss complaints received from beneficiaries in accordance to the Beneficiary Feedback and Grievance Redress Mechanism (BF&GRM).
4. The Expert Group consists of three social work experts/practitioners, who will be involved in the Expert Group activities on a voluntary and gratuitous basis. The Expert Group Members will be paid neither from the JSDF Grant proceeds nor other sources for work in the Expert Group. The activities of the Expert Group is the contribution of the AASW, as a professional community of social workers, to the Project.
5. The list of Expert Group members will be approved by the AASW Council.
6. The members of the Expert Group cannot be part of the Project Implementation Team. In cases, when a member of the Expert Group has any affiliation to a reviewed/examined topic or issue the latter should notify the Expert Group about the existing conflict of interest and refrain from participating in the discussion.
7. The Expert Group provides expert opinion, advice, or discusses complaints based on the requests of the AASW President/Project Director.
8. AASW President/Project Director may request an opinion/advice of the Expert Group regarding the Project affected person's complaint if the complainant is not satisfied with the provided (by the Project Manager) response and submitted an official appeal to the AASW President/Project Director according to the BF&RGM.
9. The Expert Group operates following the terms and rules specified by the BF&RGM.

LIST OF PROJECT ADVISORY EXPERT GROUP MEMBERS

The Council of the "Armenian Association of Social Workers" approves the following list of Project Advisory Expert Group members for the "Promoting Social Inclusion and Self-Reliant Livelihood Activities in Armenia" Project:

- **Dr. Nune Geghamyan, Ph.D. in Economics**, is an associate professor at Yerevan State University Department of Social work and social technologies and a co-founder of the Armenian Association of Social Workers with more than 20 years of experience in the fields of social work, social policy, and child protection. Currently, she is the head of the Nagashyan Children's Support Center. Geghamyan is also an author and co-author of several scientific articles and educational manuals. Besides, she has vast experience in different local and international projects.
- **Mrs. Armine Andranikyan** is an acting Deputy Head of the Nor Norq Social Service Agency with approximately 30 years of experience in the field of state social services. She has been participated in different projects and initiatives in the field of social work and social protection as a senior expert and advisor, on regular basis was involved in the preparation and capacity building of state social servants. During her practice, she has taken steps to reveal general systematic problems, made suggestions, and taken part in programs aimed at developing the social security system in Armenia.
- **Dr. Armine Mkhitarian, Ph. D in Economics** is a researcher-sociologists with almost 30 years of experience in the fields of gender equality, domestic violence, active labor, social work, and social services. At present, she is the Head of the Department of Social Assistance and Social Innovations at the National Institute of Labor and Social Research of RA. Also, as an expert, she is involved in various local and international projects implemented by UN agencies and local and regional organizations.

ANNEX 2. The Grievance Redress Mechanism Flow Chart

