



Grievance Redress Mechanism of GKEL

**GMR Kamalanga Energy Pvt Ltd,
Odisha**

Executive Summary

Revised in October 2016

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1.1 INTRODUCTION

This document reviews the existing Grievance Redress Mechanism (hereafter referred to as 'GRM') followed by GMR Kamalanga Energy Limited (hereafter referred to as 'GKEL') and provides strategic directions for enhancing its efficiency and effectiveness in future. The salient features of this GRM are a transparency in classification of the grievance categories, strengthening of the Grievance Redress Committee (hereafter referred to as 'GRC'), establishing a Standard Operating Procedure (SOP) for grievance handling and a strategic directions for documentation monitoring and reporting.

The provisions in this GRM complies to what is prescribed in PS-2, PS-4 and PS-5 which deals with workers, community health, safety and security and land acquisition and resettlement respectively.

1.2 REVIEW OF EXISTING GRM

Review of the existing GRM of GKEL was conducted by ERM team during the site visit from 08th July - 14th July 2015. The existing mechanism for grievance redress was analyzed in order to identify its strengths and areas where scope for improvement exists. SWOT analysis of the existing GRM is outlined in **Figure 1.2** below:

Figure 1.1 SWOT Matrix for GKEL's existing GRM

<p>Strengths:</p> <ul style="list-style-type: none"> • Participation of Department Heads; • Regular functioning of grievance cell • A single grievance redress mechanism for both community and workers 	<p>Weaknesses:</p> <ul style="list-style-type: none"> • Large number of grievances registered are not formally closed; • Communication to the aggrieved or complainants on action taken or status of their complaints is communicated verbally; • The grievance mechanism process is not disclosed to the community.
<p>Opportunities:</p> <ul style="list-style-type: none"> • Provides opportunity to showcase the transparency and fair practice adopted by GKEL; • To actively engage with the stakeholders and establish mutual trust between GKEL and host communities; • To identify and manage social and reputational risks of GKEL in a strategic and transparent manner. 	<p>Threats:</p> <ul style="list-style-type: none"> • The system is not perceived as transparent and responsive; • There is lack of clarity on legitimate entitlement of the communities.

In the light of the current strengths and weakness of the existing GRM, this report outlines the strategic directions for an appropriate GRM for the current operation phase.

1.3 IMPROVEMENTS IN GRIEVANCE REDRESS MECHANISM FOR INDIRECT WORKERS

The grievances of the indirect workers are maintained off-line in the Grievance Register. It is suggested to adopt a mechanism to merge these two data-bases for better documentation and monitoring.

The mechanism by which workers can submit anonymous complaints/ grievances about unethical and matters related to malpractices is through ESS SAP portal. The indirect workers need to have a similar access to register any anonymous complaint. Keeping their overall skill levels, we recommend use of complaint boxes where written complaints can be dropped. These complaint boxes can be accessed by GC on every alternate Thursday and take appropriate actions on it.

1.4 IMPROVEMENTS IN GRIEVANCE REDRESS MECHANISM FOR EXTERNAL STAKEHOLDERS

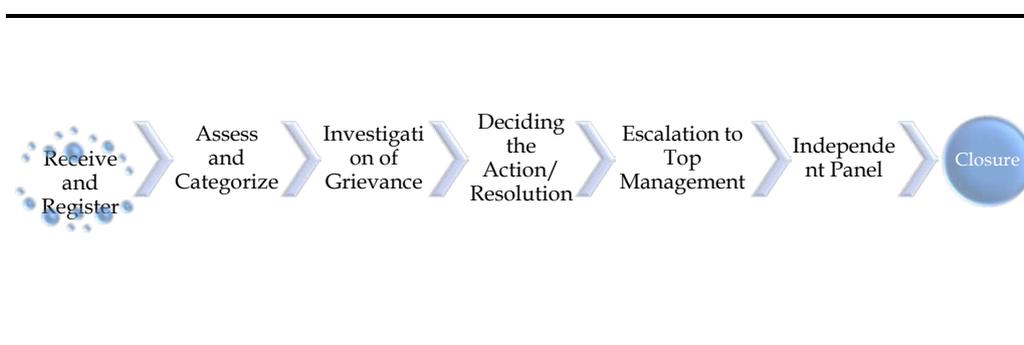
Improvements in GRM for external stakeholders are to be done in two broad areas as discussed below.

- Receiving grievances through multiple channels
- Proper closing of grievances registered in grievance register

These improvements are addressed in the updated grievance redress mechanism described in next chapter.

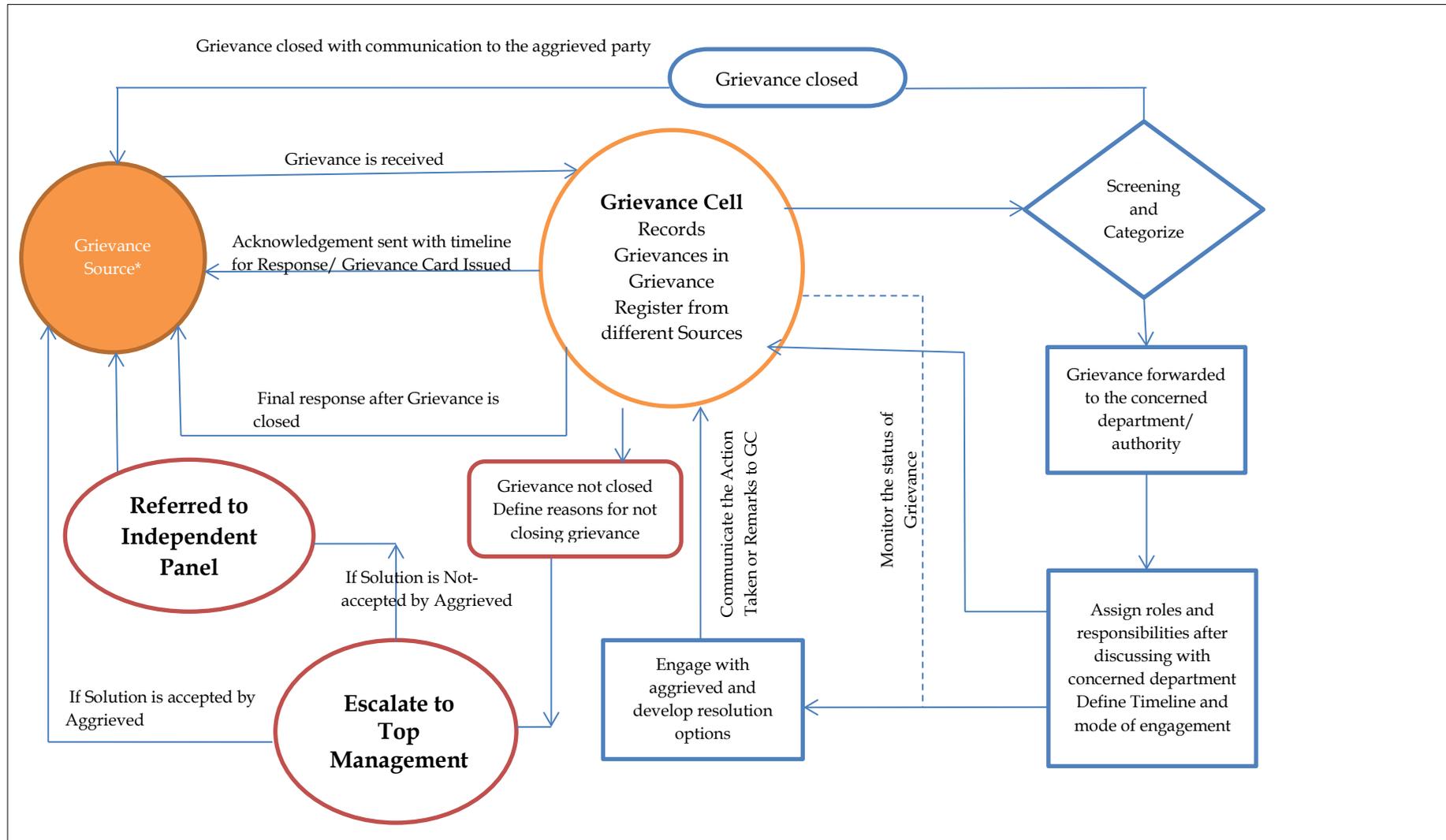
The grievance redress mechanism in operation stage of the project will include five key steps as illustrated in Figure 1.2 below.

Figure 1.2 Key steps for GRM of GKEL in Operation Phase



The process of grievance redress mechanism is presented in **Figure 1.3** and the processes are described in sub-sections below.

Figure 1.3 An Overview of the GRM of GKEL



1.5

ROLES AND RESPONSIBILITIES

The overall responsibility to implement the GRM is with the Plant Head, GKEL who should nominate a nodal officer for implementing this GRP. The nodal officer should not be below the designation of an AGM; and shall assume overall accountability of the grievance management system. The responsibility of the nodal person shall include, but not be limited to:

- Registration and acknowledgment of the grievance;
- Maintaining the documentation;
- Forwarding the grievances to concerned Departments;
- Seeking the closure report/remarks on the grievance from concerned Departments;
- Reporting on the closure status of grievances on a quarterly basis.

The GRM shall be subject to periodic internal assurance. The nodal person should present a brief report to the Business Review Council during their quarterly meeting.

GKEL should ensure that members of the GRC are competent enough and have received appropriate training to perform tasks related to their functional area specific for grievance management.

1.6

DISCLOSURE OF GRM

The process of grievance registration and its resolution process should be communicated to indirect workers and external stakeholders through multiple channels.

1.6.1

Disclosure of GRM for Indirect Workers

The disclosure of the GRM for workers will include the following:

- In the notice board in common areas accessed by workers;
- To be referred in their employment contract; and
- The hard copy of the GRP and procedure to be available from the nodal officer upon request.

1.6.2

Disclosure of GRM for External Stakeholders

The GKEL should create an e-mail id for the GC which should be disclosed in its website and other documents.

The GRM process (as in Figure 1.3) along with contact details for external stakeholders should be disclosed in following channels of information:

- Written communication to Gram Panchayats;

- Display of the email id and grievance registration location, day and time, and an emergency contact number for issues or incidences that requires immediate attention in Gram Panchayat office.
- The Display of GRM process and contact details (contact number, email, date and time) at all Gates in GKEL Plant; and
- An outline of the GRM and communication channels on the web-site of GKEL.

1.7

MONITORING AND REPORTING MECHANISM OF GRM

Monitoring and reporting of GRM shall be undertaken for measuring the effectiveness of the system and efficient use of resources, and also for determining broad trends and recurring problems so they can be resolved proactively before they become points of contention. An action tracker in excel format shall be created which helps in tracking of the status of grievances.

The GC shall track and report following aspects in its quarterly report submitted to top management.

- Whether an acknowledgement was sent to the aggrieved within three days?
- Whether the grievance was categorised and a timeline was set by the concerned department and communicated to the aggrieved?
- Whether the grievance was finally closed within the defined timeline?
- Whether a formal sign-off was received from the aggrieved stating formal closure of the grievance.
- If, the grievance was not closed within the defined timeline or resolution was not agreed to, then was it escalated to top management level.

Some grievances might point to a systemic problem in the administrative or operating systems of GKEL. For example, a grievance could expose a need to improve the Company's recordkeeping or a need for better training or support for staff who have given inaccurate or unhelpful advice. Delay in resolving a person's grievance might suggest a need for greater efficiency or better liaison between internal departments or with other parties that are jointly responsible for the subject of the complaint. The GC may decide to monitor some of the recurring grievances or long duration action plans adopted as part of grievance resolution.

1.8

SUMMARY ACTION PLAN

The summary of the actions/activities recommended under this GRM is summarized below for the ease of implementation and monitoring their implementation process.

S. N.	Activity	Objective	Responsibility for ensuring implementation	Timelines /frequency of Monitoring	Responsibility for monitoring	Means of Verification
1	Select a Nodal Person/ department for Grievance Cell	The nodal person is trained in GRM process and held responsible to implement the GRP.	GKEL- Plant Head	Immediate/ and ensure that this position is not vacant.	GKEL- COO	<ul style="list-style-type: none"> The accountability is assigned and ensure that the position is not vacant. The nodal person has complete understanding of the GRM and GRP.
2	Create an Email id for GC and display it on GKEL web-page.	The email id would be a channel for external stakeholders to register their grievances.	Nodal officer for GRC	within 7 days of submission of Final Report	GKEL- Plant Head	
3	Install Complaint Boxes at places where Indirect workers have access	Complaint Boxes to facilitate written and anonymous complaints/ suggestions from Indirect workers. Such places can be entrance gates, workers canteens, grievance room or such other work areas within the plant premise.	Nodal officer for GRC	Within 15 days from submission of Final Report.	GKEL- Plant Head	<ul style="list-style-type: none"> Complaint Boxes are installed. Maintenance of the boxes and collection of complaints on fortnight basis.
4	Disclose the GRM Report	<ul style="list-style-type: none"> The executive summary of the GRM will be uploaded on GKEL web-site. The translated copy of executive summary of GRM in Odia to be provided to Gram Panchayats The Displays of the grievance process and contact details are to be installed in Gates, Workers' Canteen, Grievance Cell and Gram Panchayat Offices. 	Nodal officer for GRC	within 15 days from submission of final report	HOD- Nodal Department	<ul style="list-style-type: none"> The displays on Grievance Process at designated places; Confirmation of the GPs on receipt of the executive summary of GRM.
5	Receiving, registering and acknowledging grievances	<p>Besides the GRC, grievances should be received from the following sources;</p> <ul style="list-style-type: none"> Staff or employees that have direct contact with communities; Complaint boxes; and 	Nodal officer for GRC	Fortnightly for direct contact and Complaint boxes. Not to exceed 3 days for Emails.	HOD- Nodal Department	<ul style="list-style-type: none"> Records of acknowledgment (sign for direct contact, reply mail for email) sent to the aggrieved; and Complete details in Grievance Register format provided in Annex-A.

S. N.	Activity	Objective	Responsibility for ensuring implementation	Timelines /frequency of Monitoring	Responsibility for monitoring	Means of Verification
		<ul style="list-style-type: none"> Emails 				
6	Prepare an Internal Guideline on Timeline for closing different Grievance Categories.	The guideline on time-frame for resolving and closing different categories of grievance will benchmark the performance of GRM.	Nodal Officer for GRC	Within 15 days from submission of Final Report.	HOD- Nodal Department	<ul style="list-style-type: none"> The time-frames for different grievance categories are reasonable and adhered to.
7	Assessing and categorizing grievances	<ul style="list-style-type: none"> Grievance Committee to determine whether a grievance is within the purview of GKEL's GRM and belong to one of the categories under Annex-B; If yes, it will assigned to the relevant lead department; Grievances that are out of the scope of GKEL GRM process will be closed with a written reply to the aggrieved. 	Nodal officer for GRC	<p>Fortnightly for direct contact and complaint Boxes</p> <p>Within 3 days of receiving Email.</p>	HOD-Nodal Department	<ul style="list-style-type: none"> Records of written communication (reply) made with the aggrieved clearly intimating that the issues raised by him/ her are not under the purview of GKEL's GRM. The grievances are assigned to respective Departments for investigating and resolution within 2 days from registration date.
8	Investigating grievances	<ul style="list-style-type: none"> The timeline for each grievance should be determined in consultation with the concerned department only after the grievance has been assigned to it; The timeline for redressal, investigation process and possible resolution options for each grievance should be communicated to the aggrieved in written form; and If the grievance registered does not fall within the purview of the GRM of GKEL, the same should be explained up front to the 	HODs of concerned Department	As per internal Guideline for reasonable timeframe for resolving each category of Grievances as in Annex-B.	Plant- Head	<ul style="list-style-type: none"> Records of written communication made to the aggrieved indicating the timeline (in case of complex grievances), investigation process and possible resolution options of the registered grievance; and Records (in the grievance register) of cases wherein the aggrieved has been communicated that the grievance is not within the scope of the GRM of GKEL.

S. N.	Activity	Objective	Responsibility for ensuring implementation	Timelines /frequency of Monitoring	Responsibility for monitoring	Means of Verification
9	Resolution and engagement with the aggrieved	<p>aggrieved. Alternate avenues for redressing such grievances may also be communicated to the aggrieved.</p> <ul style="list-style-type: none"> To the extent possible, the resolution should be drawn to meet the expectation of the aggrieved. However, in case the aggrieved is not satisfied with the resolution, he should be given a chance to escalate the matter to the senior management. 	Nodal officer for GRC and third party (RPDAC, district administration, tehsildar etc.)	Within the time-frame decided in Internal Guideline.	Plant Head	<ul style="list-style-type: none"> The acceptance of the resolutions by the aggrieved vis-à-vis number of cases escalated to senior management. Records of grievances that have been closed as per the Guideline on time-frame for closure.
10	Escalating grievances	<p>Grievances will be escalated to senior management level in two cases:</p> <ol style="list-style-type: none"> Grievances that are complicated, involve considerable expense or have serious implications on GKEL's operations or business interests When the aggrieved wish to escalate the matter to senior management. <p>If the Aggrieved is not satisfied with the solutions offered by senior management, then he will be given the option of constituting an 'independent panel' and refer the matter to it.</p>	Nodal officer for GRC and Plant Head	As Required	GKEL COO	<ul style="list-style-type: none"> Records of grievances that have been escalated to the senior management due to the non-acceptability of the resolution offered to the aggrieved; and Records of complicated grievances that were referred to the senior management along with summary notes explaining each grievance. The records of the resolutions made by 'independent panel' and its acceptance by both parties.

S. N.	Activity	Objective	Responsibility for ensuring implementation	Timelines /frequency of Monitoring	Responsibility for monitoring	Means of Verification
11	Closing grievances	<ul style="list-style-type: none"> The timelines for closure of grievances will be communicated to the aggrieved based on the internal guideline on time-frame of closure of different categories of grievances. The communication of closure of a grievance to the aggrieved shall clearly indicate the date when the grievance was registered, the process of resolution adopted, the resolution of the grievance being proposed and whether there is any scope for escalation. 	Nodal officer for GRC	Continuous process	HOD- Nodal Department	<ul style="list-style-type: none"> Records of written communication between the GC and concerned departments concerning timeline for closure of complex grievances; and Records of written communication made to the aggrieved concerning the closure of his/ her grievance.
12	Monitoring of GRM and Quarterly Reports	<p>The monitoring of the GRM functioning will be done in a quarterly basis and a report should be prepared covering following indicators.</p> <ul style="list-style-type: none"> Whether an acknowledgement was sent to the aggrieved within three days? Whether the grievance was categorised and a timeline was set by the concerned department and communicated to the aggrieved? Whether the grievance was finally closed within the defined timeline? Whether a formal sign-off was received from the aggrieved 	HOD-Nodal Department	Quarterly	Plant Head	<ul style="list-style-type: none"> The key observations in quarterly reports on Grievance Management and actions taken in response to them. Discussion on these quarterly reports in senior management meetings.

S. N.	Activity	Objective	Responsibility for ensuring implementation	Timelines /frequency of Monitoring	Responsibility for monitoring	Means of Verification
		stating formal closure of the grievance. <ul style="list-style-type: none"> • If, the grievance was not closed within the defined timeline or resolution was not agreed to, then was it escalated to top management level. 				

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