The South Coast Water Reclamation Project

Grievance Redress Mechanism (GRM)

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List of ACRONYMS

BWA – Barbados Water Authority/Executing Agency

CLO - Community Liaison Officer

ESMP – Environmental and Social Management Plan

ESPF - Environmental and Social Policy Framework

ESPS - Environmental and Social Performance Standards

GBVH – Gender-based Violence and Harassment

GBV – Gender-based Violence

GMS – Grievance Management System

GRM – Grievance Redress Mechanism

HSE – Health, Safety and Environment Officer

IDB – Inter-American Development Bank

MICI – Independent Consultation and Investigation Mechanism

MIS – Management Information System

OHS – Occupational Health and Safety

PEU – Project Executing Unit

SCWRP – South Coast Water Reclamation Project

SEA – Sexual Exploitation and Abuse

SH – Sexual Harassment

Definitions

Accessible – a principle that guides a GRM. A mechanism must provide a clear and known procedure, with time frames for each stage; clarity on the types of process and outcome it can (and cannot) offer; and means of monitoring the implementation of any outcome. [1]

Child - any person under the age of 18 years (UNICEF, 1989).

Company - private sector organizations, including recipients of an investment from an investor (International Finance Corporation [IFC], 2022).

Complainant– An individual or group with an issue, concern, problem, complaint, or claim that he, she, or they want addressed and/or resolved (Compliance Advisor/Ombudsman, 2008).

Complaint– An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve. Synonymous with grievance (Compliance Advisor/Ombudsman, 2008).

Compliance– Commitment to follow and/or implement in both spirit and letter relevant laws, rules, regulations, or negotiated agreements (Compliance Advisor/Ombudsman, 2008).

Confidentiality - The disclosure of certain information is restricted (United Nations [UN], 2016)

Data protection - is the act of protecting personal or sensitive information in how it is collected, stored, used, and shared.[2]

Duty of Care - a legal obligation requiring adherence to a standard of reasonable care while performing any acts that could foreseeably harm others. Another definition of DoC would be a legal obligation to act towards others with prudence and vigilance in order to prevent any risk of foreseeable damage.[3]

Ethical guidelines - are followed to protect the safety of both victims and the professionals providing services or programming. These include respect for persons, non-maleficence (minimizing harm), beneficence (maximizing benefits), and justice. [4]

Equitable - a principle that guides a GRM A mechanism must ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms.[5]

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[1] Office of the Compliance Advisor/Ombudsman) for the International Finance Corporation (IFC), 2008.
[2] https://www.gbvims.com/data-protection/
[3] https://www.equalityhumanrights.com/guidance/sexual-harassment-and-harassment-work-technical-guidance#thirdpartyharassmentpublicsectorequalitydutypsed
[4] https://www.worldbank.org/en/programs/violence-against-women-and-girls/ethics
[5] Office of the Compliance Advisor/Ombudsman) for the International Finance Corporation (IFC), 2008.

Gender - Social attributes and opportunities associated with being female and male and to the relationships between women and men and girls and boys, as well as to the relations between women and those between men (European Institute for Gender Equality, 2016).

Gender equality - Equal rights, responsibilities and opportunities of women and men and girls and boys (European Institute for Gender Equality, 2016).

Gender-based violence - is defined as any harmful act committed against a person without their consent and based on their gender, sexual orientation, or gender identity. It includes acts that cause physical, sexual, psychological, and economic harm, as well as threats of such actions. These acts can occur in the public sphere (streets, workplaces, schools, public transportation) or the private sphere (home).[6]

Grievance Redress Mechanism (GRM) – processes that can be used by workers, community members and service users to make complaints or report concerns (International Finance Corporation [IFC], 2022).

Informed consent - the communication process by which the participant receives information relevant to their role and is able to make a voluntary choice to participate with full information of benefits and potential risks. [7]

Legitimate – a principle that guides a GRM. A mechanism must have clear, transparent and sufficiently independent governance structures to ensure that no party to a particular grievance process can interfere with the fair conduct of that process.[8]

Mediation– It is a process whereby a third party assists two or more parties, with their consent, to prevent, manage or resolve a conflict by helping them to develop mutually acceptable agreements (United Nations [UN], 2017).

Perpetrator - a person (or group of persons) who commits an act of SEA/SH/GBV or other type of crime or offence (United Nations [UN], 2016).

Rape/Attempted rape - to constrain someone, through violence or threats, to engage in sexual intercourse or to forcibly submit them to other acts of a sexual nature; or to engage in sexual acts with someone who is unable to exercise free and informed consent.[9]

Retaliation - any form of threat, harassment, violence, or punitive action taken against an individual, group, or organization (such as a worker, contractor, community member, activist,

[6] IDB Guide on Preventing and Addressing Gender-based Violence in Projects. 2024.
[7] Taken from the publication by the WHO (2016), Ethical and Safety Recommendations for Intervention Research on Violence Against Women
[8] Office of the Compliance Advisor/Ombudsman) for the International Finance Corporation (IFC), 2008.
[9] IDB Guidance Note – Internal Investigations of GBVH Complaints.

human rights defender[10] or civil society organization (CSO)) who has lodged a complaint or voiced criticism or concerns about a company or a development project (International Finance Corporation [IFC], 2021).

Re-victimization - is often used to refer to victims who experienced GBV once before (sometimes in their childhood or youth), and experience one or more additional incidences later in life. In this context, however, it refers to the unsympathetic treatment victims sometimes face in dealing with the justice or health system, an experience that can be a secondary form of victimization.[11]

Safeguarding - refers to the measures organizations take to keep people safe from sexual exploitation and abuse and sexual harassment (SEAH), and other forms of harm. It addresses harm that may be caused by a staff member or associate, or the organization's operations or programmes.[12]

Sexual abuse - the actual or threatened physical intrusion of a sexual nature, carried out through force, inequality, or coercion.[13] In the context of a project, it occurs when a project worker uses physical force or abuses their position of power over a community member or colleague to commit or threaten an unwanted sexual act (International Finance Corporation [IFC], 2022).

Sexual exploitation - Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (European Institute for Gender Equality, 2016).

Sexual harassment - encompasses a wide range of behaviors and practices of a sexual nature, such as unwelcome sexual comments or advances, requests for sexual favors, gestures, or verbal and physical behaviors of a sexual nature which could reasonably be perceived as offensive or humiliating to another person. (International Finance Corporation [IFC], 2022).

Sexual Harassment - Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment occurs between personnel/staff (European Institute for Gender Equality, 2016). *Additional reference to sexual harassment occurring in the work environment between personnel/staff (International Finance Corporation [IFC], 2022).*

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[10] Human rights defenders are defined by the United Nations Office of the High Commissioner on Human Rights (OHCHR) as people who act to address any human right (or rights) on behalf of individuals or groups. Human rights defenders seek the promotion and protection of civil and political rights as well as the promotion, protection, and realization of economic, social, and cultural rights. 7
https://www.ohchr.org/en/issues/srhrdefenders/pages/defender.aspx

[11] https://www.worldbank.org/en/programs/violence-against-women-and-girls/ethics

[12] https://safeguardingsupporthub.org/journey/safeguardingseah-definitions

[13] IDB, 2021. Guidance for Environmental and Social Performance Standard 9: Gender Equality, Page 26.
https://www.iadb.org/en/who-we-are/topics/environmental-and-social-solutions/environmental-and-social-policy-framework

Stakeholders – are persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or have the ability to influence its outcome either positively or negatively (Compliance Advisor/Ombudsman, 2008).

Subject of the complaint - A person or entity who/that is the focus of an investigation (United Nations [UN], 2016).

Survivor - generally preferred in the psychological and social support sectors to a person who has experienced sexual or gender-based violence because it implies resilience (United Nations [UN], 2016).

Survivor-centred approach – A survivor-centred approach prioritizes survivors' rights, ensuring they receive dignity and respect. By placing survivors at the centre, a programme can aid their recovery, minimize further harm, and support their empowerment.[14]

Transparent - A GRM must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible. Nonstate mechanisms in particular should be transparent about the receipt of complaints and the key elements of their outcomes.[15]

Victim - a natural person who has suffered harm, including physical, mental or emotional harm or economic loss which was directly caused by a criminal offence, as well as the family members of a person whose death was directly caused by a criminal offence and who have suffered harm as a result of that person's death (European Institute for Gender Equality, 2016).

Violence against women - Violation of human rights and a form of discrimination against women including all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life (European Institute for Gender Equality, 2016).

Vulnerable groups - Women, children and persons belonging, or perceived to belong, to groups that are in a disadvantaged position or marginalized (European Institute for Gender Equality, 2016).

[14] https://www.spotlightinitiative.org/design-survivor-centred-programme
[15] https://www.unepfi.org/humanrightstoolkit/grievance-mechanisms/

Introduction

The Grievance Redress Mechanism (GRM) for the South Coast Water Reclamation Project (SCWRP) is a structured process established to receive, record, assess, respond, monitor and close any questions, concerns, complaints, and feedback from external (individuals and groups who may be impacted by the project) and internal (contractors, subcontractors, workers etc.) stakeholders.[16]

The mechanism provides a clear and accessible channel through which stakeholders can raise issues related to the planning, construction, implementation and operationalization of the project, including potential engineering, environmental, social and gender-related, and health and safety impacts.

The GRM is designed to support transparent communication and timely resolution of questions, concerns and complaints. It enables community members, contractors, subcontractors, workers, suppliers and other stakeholders to express questions, concerns, suggestions, or grievances in a manner that is accessible, equitable, inclusive, respectful, safe, fair, legitimate, and confidential.

By providing a formal opening for dialogue, the mechanism helps strengthen trust and communication between the Barbados Water Authority, the Executing Agency, Project Executing Unit (PEU) of the SCWRP, contractors, workers and surrounding communities.

The establishment of the GRM forms part of the project's broader commitment to responsible environmental, social and gender management. It contributes to identifying and addressing risks associated with project activities, while promoting accountability and responsiveness in project implementation. The mechanism also complements ongoing stakeholder engagement activities by providing an additional pathway for individuals to seek clarification, raise concerns, or request corrective actions where necessary.

In line with good international practice,[17] the GRM is intended to ensure that potential grievances are handled promptly, impartially, and in a manner that respects the rights and dignity of all parties involved. Special provisions are included to address sensitive complaints, including those related to labour conditions, community impacts, or incidents involving sexual exploitation and abuse, sexual harassment (SEA/SH) or gender-based violence (GBV). Such cases will be managed using a survivor-centred approach and appropriate confidentiality safeguards.

The GRM also functions as a practical management tool for the project. Information gathered through grievances and feedback can help identify emerging issues, improve project performance, and strengthen the implementation of environmental and social commitments contained in the project's Environmental and Social Management Plan (ESMP).

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[16] https://idbinvest.org/en/publications/investigating-gender-based-violence-and-harassment-complaints-practical-guide

[17] Sourced from the Green Climate Fund (2019), Procedures and Guidelines of the Independent Redress Mechanism. https://www.greenclimate.fund/document/procedures-and-guidelines-independent-redress-mechanism.

Through this mechanism, the project aims to ensure that questions, concerns and complaints are addressed constructively, risks are managed effectively, and stakeholders remain informed and engaged throughout the life of the project.

Scope of the GRM

The GRM for the SCWRP establishes a formal, transparent, and accessible process for receiving, assessing, and resolving grievances raised by individuals or groups affected by project activities, and applies to the full scope of the project, covering all activities under Components 1-4 of the SCWRP.

The GRM is designed to ensure that grievances related to the engineering, environmental, health and safety, social and gender-related impacts are addressed in a timely, fair, and consistent manner, in accordance with the Inter-American Development Bank's Environmental and Social Performance Standards (ESPS).[18]

The GRM serves as a key accountability and risk management tool, supporting the early identification and resolution of issues, improving project performance, and fostering trust and constructive engagement among the BWA, SCWRP-PEU, and both external (individuals and groups who may be impacted by the project) and internal (contractors, subcontractors, workers), stakeholders.

The GRM applies throughout all phases of the project, including design, planning, construction, commissioning, and operation.

The GRM provides a process to receive, record, assess, and facilitate the resolution of grievances including, but not limited to:

- Environmental impacts including issues related to noise, water, air (dust, etc) and/or soil quality, waste management, biological diversity and conservation, ecosystem services, and pollution.
- Social impacts affecting communities, livelihoods, access to resources, and public safety
- Engineering, transport, construction and operation-related disturbances, including traffic, access restrictions and site management practices.
- Labour and working conditions
- Community health and safety risks
- Conduct of project personnel, contractors, subcontractors or suppliers
- Complaints related to gender-based risks, including sexual exploitation and abuse (SEA) and sexual harassment (SH)

[18] https://publications.iadb.org/en/idb-environmental-and-social-grievance-protocol-2024-annual-report

The GRM shall operate in a manner that is culturally appropriate,[19] accessible, equitable, inclusive, respectful, safe, fair, legitimate, with specific provisions to ensure confidentiality, non-retaliation, and a survivor-centred approach for sensitive grievances, such as SEA/SH,GBV-related complaints.

The mechanism does not impede access to judicial or administrative remedies available in the Republic of Barbados. Complainants retain the right to seek resolution through national legal systems or other available grievance mechanisms at any stage.

Objectives of the GRM

The GRM is designed to achieve several key objectives:

- Provide stakeholders with a clear and accessible channel to raise questions, concerns, and submit complaints, or offer feedback regarding project activities.
- Ensure that grievances are recorded, assessed and addressed in a timely, fair, and transparent manner.
- Facilitate dialogue between complainants and project representatives to identify practical and mutually acceptable solutions.
- Promote trust through transparency and communication, dissemination of results, cooperation, and constructive engagement between the SCWRP and the surrounding and or affected communities.
- Support the effective management of engineering, occupational health and safety, environmental, and social and gender-related risks associated with project implementation (design, construction and operational).
- Strengthen project performance by identifying recurring issues and lessons that can inform improved project management.

Guiding Principles

The GRM will operate according to the following principles to ensure credibility and effectiveness:

Fairness and impartiality

All complaints will be handled objectively and assessed without bias. Decisions will be based on available evidence and applicable project commitments, national regulations and policies.

[19] https://www.ifc.org/content/dam/ifc/doc/mgrt/ifc-communitybasedgrievancemechanism-toolkit.pdf

Accessibility and simplicity

The mechanism is designed to ensure that stakeholders can easily submit grievances through multiple channels such as email, telephone, written submissions, suggestion boxes, text messages, town hall meetings, community groups or in-person reporting. Information about the GRM will be communicated to project stakeholders.

Transparency and accountability

Detailed procedures are established for receiving, documenting, reviewing, and responding to complaints. Complainants will be informed of the status, progress and outcome of their case.

Confidentiality and anonymity

Sensitive complaints will be handled with strict confidentiality, protecting the identity of complainants. The mechanism will allow individuals to submit grievances anonymously if preferred.

Inclusiveness and non-discrimination

The GRM will be accessible to ALL stakeholders regardless of gender, age, disability, income level, nationality, language or social status. Special attention will be given to ensuring participation of vulnerable or marginalized groups.

Gender-responsiveness and cultural sensitivity

Grievances will be handled in a manner that respects cultural contexts and promotes gender equality.

Survivor-centred approach for SEA/SH, GBV complaints

Cases involving sexual exploitation, abuse, harassment or gender-based violence will be managed through confidential processes that prioritize the safety, dignity, and wishes of victims, including referral to appropriate support services where required.

Relationship with Stakeholder Engagement

The GRM is an integral part of the project's broader Stakeholder Engagement, Communications and Social Risk Management Operations Manual and complements ongoing consultations and information-sharing activities. While it provides a formal avenue for complaints and feedback, it does not replace proactive engagement with communities and other stakeholders throughout the project lifecycle.

The PEU and the Contractor will implement a proactive communication outreach plan to ensure that all stakeholders are aware of the GRM throughout the project cycle. Information on the GRM, its purpose, eligibility, submission channels, confidentiality provisions, and expected response timeframes, will be communicated before construction begins and reinforced throughout implementation.

Awareness activities will include stakeholder engagement meetings, town hall meetings, CLO engagement, distribution of printed materials (e.g. press releases, community notices, construction bulletins, publication on BWA's website and social media platforms where applicable). The Contractor's HSE Officer (or designated representative) will also provide information on the GRM during routine community engagement activities.

For project workers information on the GRM will be provided during induction training and/or Code of Conduct training and reinforced during toolbox talks and periodic refresher sessions. Regular reminders of the GRM will be provided throughout the project cycle to maintain stakeholder awareness and encourage timely reporting of grievances.

Learning and Continuous Improvement

Beyond resolving individual and group complaints, the GRM will function as an early warning and learning system for the SCWRP. Information gathered through grievances and feedback will be analyzed to identify patterns or emerging risks. These insights will help strengthen the design, construction and operational project phases, engineering, environmental, social and gender-related, and health and safety management practices. Moreover, they will support continuous improvement in project communication and implementation.

Access to External Remedies

The GRM does not prevent complainants from seeking other forms of redress through national legal or administrative systems. Stakeholders retain the right to pursue judicial or administrative remedies if they are dissatisfied with the outcome of the grievance process.

Eligible Grievances Under the GRM

The GRM provides for the SCWRP an accessible avenue for individuals and groups to raise concerns, submit complaints, or provide feedback related to project activities. The process is intended to address issues that may arise during the planning, construction, and operational phases of the project and that may affect communities, workers, or other stakeholders.

Grievances eligible under this mechanism include concerns related to engineering, environmental, social and gender-related, health and safety impacts, as well as issues related to stakeholder engagement. The GRM include specific procedures for handling complaints related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-based Violence (GBV), ensuring that such cases are managed in a survivor-centred, confidential, and safe manner.

Submission and Handling of Evidence

Complainants are encouraged but not required to provide any available supporting evidence to substantiate their grievance, including (SMS, WhatsApp, social media etc.) messages, photographs, videos, documents, audio recordings or witness statements. All evidence submitted shall be securely recorded, stored and handled with strict confidentiality in accordance with data protection and ethical guidelines.[20]

The collection, verification, storage, and analysis of such evidence will be carried out only by the designated SCWRP PEU personnel with appropriate expertise in case management, data protection, and, where relevant, SEA/SH and GBV-sensitive procedures.

The GRM shall ensure that lack of evidence does not prevent a complaint from being registered or assessed, and that all grievances are reviewed fairly and impartially based on the information available.

Stakeholders Eligible to Submit Grievances

The GRM is open to all individuals or groups who may be directly or indirectly affected by the project. This includes:

- Residents and community members living near project sites or infrastructure
- Local businesses and service providers
- Community organizations and civil society groups
- Government agencies and local authorities
- Project workers, including contractors and subcontractors personnel
- Landowners or resource users affected by project activities
- Any other stakeholder with an interest in or concern about the project

Grievances may be submitted by individuals, community representatives, groups, or organizations on behalf of affected persons.

Types of Eligible Grievances

The GRM will receive and address grievances related to project activities, including but not limited to the following categories:

Environmental Concerns

- Soil or air (dust etc.) quality, noise, or vibration, impacts quality impacts from construction activities

[20] All SCWRP data will be stored in a secure, centralized, database that is auditable according to BWA's data protection standards.

- Waste management practices and disposal of Construction and Demolition Waste (C&DW)
- Water (fresh, brackish and/or marine) quality, wastewater discharge, or impacts on coastal management practices and disposal of Construction and Demolition Waste materials
- Water pollution, wastewater discharge, or impacts on coastal or groundwater resources
- Odours or other environmental nuisances associated with SCWRP implementation (engineering, transport, construction and operation)
- Impacts on natural resources (flora and fauna) and ecosystems services
- Toxicology, pollution and environmental health [21]

Social Impacts on Communities

- Disruptions to local communities due to engineering, transport, construction and operation activities
- Traffic congestion, road closures, or access restrictions caused by SCWRP works
- Damage to private property, utilities, or community infrastructure
- Impacts on livelihoods, businesses, or public spaces
- Concerns related to land access or temporary use of land for project purposes

Community Health and Safety

- Community health and safety risks associated with engineering, construction and operation sites, with conveyance, or with machinery, equipment, materials and tools used in the SCWRP
- Hazards affecting pedestrians, motorists, or nearby residents
- Public health concerns related to wastewater treatment or reclaimed water use
- Emergency incidents or accidents related to project activities
- Worker-community interactions

Labour and Working Conditions

- Concerns raised by project workers related to workplace conditions
- Occupational health and safety issues
- Workplace grievances involving contractor or subcontractor management practices
- Non-compliance with applicable labour standards or project labour requirements

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[21] Toxicology studies how chemicals harm organisms; pollution is the introduction of contaminants into the environment; and environmental health focuses on how these environmental conditions affect human health. Toxicology studies mechanisms of harm, pollution is the source of danger, and environmental health seeks to prevent illnesses from that danger. *https://www.niehs.nih.gov/health/topics/science/toxicology#:~:text=Toxicology%20is%20the%20study%20of,What%20is%20NIEHS%20Doing?*

Stakeholder Engagement and Communication

- Concerns regarding lack of consultation, information, or transparency
- Dissatisfaction with how project information has been shared with stakeholders
- Feedback regarding public meetings, consultations, or outreach activities

Conduct of Project Personnel

- Complaints regarding inappropriate behavior or misconduct by project staff, workers, contractors, subcontractors, and suppliers
- Non-compliance with Codes of Conduct or community health, safety and interaction protocols

Sexual Exploitation & Abuse, Sexual Harassment and Gender-based Violence

- Complaints related to sexual exploitation, sexual abuse, sexual harassment or gender-based violence involving project personnel, contractor, subcontractors, workers, suppliers or activities
- These complaints will be handled through a confidential, survivor-centred approach and will include referral to appropriate support services where necessary
- Any allegation, suspicion, or report involving the sexual exploitation, sexual abuse or sexual harassment of a child linked to project activities, contractors, subcontractors, workers or associated project personnel

Non-Eligible Complaints

The GRM is intended to address issues related specifically to the project and its activities. Complaints that are unrelated to the project, involve broader national policy issues, or fall outside the authority of the PEU may not be addressed through the GRM. In such cases, complainants may be referred to the appropriate institutions or authorities.

Submission of Anonymous Complaints

The GRM will accept anonymous grievances to ensure that individuals feel safe reporting concerns, particularly in situations where there may be fear of retaliation or stigma. While anonymity may limit the ability to provide direct feedback to the complainant, such complaints will still be reviewed and addressed where sufficient information is available.

GRM Procedures

1. GRM STRUCTURE AND ENTRY POINTS

Grievances may be submitted through the following levels:

- Level 1: Community and Outreach (Community Liaison Officer(s), Suggestion Boxes at Schools, and Town Halls)
- Level 2: Construction Site (Suggestion Box, Contractor, HSE Officer)
- Level 3: Barbados Water Authority (BWA)
- Level 4: PEU and SCWRP Specialists
- Level 5: IDB's Grievance Portal[22]
- Internal Channels - Email, QR Code, SCWRP/BWA Website, Dedicated Hotline, WhatsApp Number
- External Channel – Informal grievances

2. STEP-BY-STEP GRIEVANCE PROCEDURE

Step 1: Submission of Grievance

1.1 Modes of Submission

Grievances may be submitted via:

- In-person (verbal or written)
- Dedicated hotline/WhatsApp number
- Email, QR Code, Website (BWA/SCWRP)
- Suggestion boxes in Communities, Schools, and Town Halls
- Community Liaison Officer
- Anonymous submissions
- Contractors and HSE Officers

Data captured through all grievance channels will be recorded and securely stored in the SCWRP Grievance Management System which will be used to track each case from intake to closure, monitor response times and resolutions, and generate periodic reports for BWA, IDB and other stakeholders (as necessary).

[22] https://www.iadb.org/en/who-we-are/file-complaint/grievances-portal

1.2 Special Provisions

- Anonymous complaints are accepted (verbal or written)*
- SEA/SH/GBV complaints may be submitted confidentially through SCWRP Specialists
- Assistance must be provided for vulnerable groups (elderly, persons with disabilities, women etc.)

*Anonymous grievances will be accepted through all GRM channels and will be recorded in the central GRM register with a unique reference number and marked as 'Anonymous'.

Step 2: Intake and Registration

2.1 Responsible Party

The SCWRP designated Public Relations & Communications Officer and Social Management Specialist

2.2 Actions (Within 2 Days)

- Record grievance in Grievance Uptake Form, including any supporting information.
- Issue acknowledgement of receipt (except for anonymous complaints)
- Assign unique reference number
- Remove personally identifiable information (for confidentiality)
- Categorize grievance:
    - Environmental
    - Social/community
    - Labour/workplace
    - Land or livelihood
    - SEA/SH/GBV (confidential category)
- Assign a severity score to the grievance (rating how serious the issue is, using clear criteria and a standardized numerical scale, for example, "1- as a minor inconvenience, 5 – potential harm or regulatory exposure)
- Anonymous complaints that relate to the same issue will be grouped together and analyzed as one broader case or pattern ("a cluster").

Step 3: Screening and Eligibility Assessment

3.1 Timeline (3- 5 Working Days)

3.2 Screening Criteria

- Is the complaint related to project activities?
- Is it within project geographic scope (South Coast and or East West Corridor)?
- Does it fall under the SCWRP GRM policy?

3.3 Outcomes

- Eligible: Proceed to investigation
- Ineligible: Refer to appropriate authority and inform complainant

3.4 SEA/SH/GBV Cases

- Immediately flagged and fast-tracked
- Referred to the Social Management Specialist, and SCWRP PEU/GRM Sub-Committee
- No detailed information recorded beyond what is necessary

Step 4: Assignment and or Escalation

4.1 Allocation by Level

- Minor issues → CLO or Contractor (First Level)
- Moderate issues → PEU/GRM Sub-Committee (Second Level)
- Complex/high-risk issues → IDB (Third Level)

4.2 Escalation Rules

- If a complaint is not resolved within the defined timeline at its current level, it will automatically escalate to the next level
- Complainant may request escalation at any time
- Complainants may also choose to access external mechanisms (e.g., police, judicial system, regulatory bodies or independent oversight) at any time, independent of the SCWRP GRM.

Step 5: Investigation

5.1 Timeline (10-15 Working Days)

5.2 Responsible Entity

Assigned SCWRP Social Management Specialist or SCWRP PEU.

5.2 Activities

- Review complaint details
- Conduct site visits (if necessary)
- Interview stakeholders (complainant, contractor, affected person(s))
- Review documentation (contracts, safeguards, permits)
- Coordinate with agencies (e.g. environmental, social, health)

5.3 Timelines

- Standard cases: within 30 days (maximum)
- Complex cases: Extended timeline with written justification

5.4 SEA/SH/GBV Cases

- No investigation by untrained personnel
- Immediate referral to survivor-centred support services (The Barbados Police Service, medical, legal or ethical, counselling or psychosocial, NGO, Bureau of Gender Affairs)
- Focus on safety, confidentiality, and consent

Step 6: Resolution Development

6.1 Resolution Options

- Corrective action (e.g. repair, compensation, mitigation)
- Policy or procedural adjustment
- Disciplinary action (for worker-related grievances)
- Referral to external authority (if required)

6.2 Validation

- Proposed resolution reviewed by SCWRP PEU/ GRM Sub-Committee
- Ensure alignment with:
    - National laws of Barbados

- Environmental and Social Management Plans (ESMPs)
- IDB environmental, social and gender-related safeguard requirements

Step 7: Communication of Outcome

7.1 Timeline (Within 3- 5 Working Days)

7.2 Method

- Written response to Complainant (letter/email)
- Verbal explanation (if necessary)
- For anonymous grievances, where the complainant has not provided contact details, the SCWRP will not be able to provide individualized feedback. These grievances will be assessed, investigated and addressed using the same procedures and timelines as non-anonymous grievances. Actions taken will be reflected in SCWRP GRM reports, and SCWRP/BWA website, in a manner that protects confidentiality.

7.2 Content

- Summary of grievance
- Findings of investigation
- Proposed resolution
- Timeline for implementation

Step 8: Acceptance or Appeal

8.1 If Accepted

- Complainant signs or confirms acceptance
- Case proceeds to closure

8.2 If Not Accepted

- Complainant may:
    - Request reconsideration
    - Escalate to the SCWRP PEU/GRM Sub-Committee or the IDB
    - Access external grievance mechanisms (e.g. MICI)

*Important

- Mediation is not permitted for SEA/SH/GBV cases

Step 9: Implementation of Resolution

9.1 Responsible Party

Contractor, SCWRP PEU or BWA.

9.2 Actions

- Execute corrective measures
- Monitor compliance
- Document completion

Step 10: Monitoring, Reporting and Learning

10.1 Internal Monitoring and Reporting

- GRM Dashboard:
    - Number of grievances
    - Resolution time
    - Types and trends
    - Updates provided in SCWRP PEU Weekly Unit Meetings
    - Monthly Stakeholder Risk Report
    - Board Reporting

10.2 Public Reporting

- Quarterly disclosure of:
    - Number of complaints
    - Categories
    - Resolution rates (No personal data disclosed)
    - Escalation pathway

10.3 Learning and Improvement

- Identify recurring issues
- Emerging corridor risks
- Operational patterns
- Stakeholder fatigue signals

- Engineering, environmental, social and gender-related concern indicators
- Adjust project implementation practices
- Feed into ESMP and risk management updates

Step 11: Closure of Grievance

11.1 Conditions for Closure

- Resolution implemented
- Complainant satisfied (where applicable)
- All actions documented

11.2 Final Documentation

- Case status updated in the Grievance Management System (GMS)
- Closure note recorded
- Supporting evidence filed

3. SPECIAL PROTOCOLS (Procedures That Prioritize Protection, Support, And the Autonomy of The Victim Above All Else)

3.1 SEA/SH/GBV Cases

- Confidential intake
- Survivor-centred approach
- Immediate referral pathways
- No requirement for victims to provide proof
- Strict data protection

3.2 Worker Grievances

- May be handled through:
    - Contractor HR Systems - All Contractors are required to enforce the Code of Conduct prohibiting SEA/SH/GBV; Training workers on acceptable behaviour and applying sanctions for violations (suspension, termination, reporting to authorities, etc.)
    - BWA HR (for SCWRP personnel)

    - IDB – Serious incidents including SEA/SH/GBV allegations related to the project, must be reported to the IDB within a specified timeframe (often within 24-48 hours), while still maintaining confidentiality

- Must remain accessible and independent of management retaliation

3.3 Anonymous Complaints

- Accepted and investigated where possible
- Public updates may be used to communicate outcomes

4. KEY PRINCIPLES

- Accessibility and inclusiveness (especially for women and other vulnerable groups)
- Transparency and accountability
- Confidentiality and data protection
- Timeliness and efficiency
- Non-retaliation
- Alignment with national legislation and international safeguard frameworks

5. INDICATIVE TIMELINE SUMMARY

Step	**Timeline**
Acknowledgement	≤ 2 days
Screening	≤ 5 days
Investigation	≤ 15 days
Resolution & Communication	≤ 5 days
Closure	Upon acceptance

Institutional Responsibilities - Roles and Functions

The table below outlines a listing of institutional responsibilities, roles, and functions pertaining to the management and monitoring of the GRM:

Responsible Institution/Person	Roles	Functions
Community Liaison Officer (CLO)	The BWA CLO serves as the primary point of contact for communities and project stakeholders, facilitating communication, building trust, and ensuring that concerns, complaints, and feedback are appropriately received and addressed through the GRM.	The CLO supports the effective operation of the GRM by serving as the main point of contact between the project and stakeholders. The CLO is responsible for raising awareness about the GRM, receiving and documenting grievances, and ensuring they are appropriately categorized and referred for action. The CLO also facilitates timely communication and follow-up with complainants, maintains accurate and confidential records, and supports the referral of sensitive cases, including SEA/SH/GBV complaints, in line with established protocols.
Contractor	The Contractor is responsible for ensuring that all grievances linked to their work and project activities are promptly identified, reported, and addressed in line with the SCWRP's GRM procedures, contractual obligations, and ethical standards.	The Contractor supports the effective implementation of the GRM by ensuring that all grievances related to site activities and workforce conduct are promptly identified, reported, and addressed. This includes raising awareness among workers about the GRM and the Code of Conduct, receiving and escalating complaints, and taking immediate action on minor site-level issues where appropriate. The contractor also ensures that breaches of the Code of Conduct are addressed through the GRM, facilitates the referral of sensitive cases such as SEA/SH/GBV complaints through confidential channels, and cooperates with the SCWRP PEU in investigations and resolutions. In addition, the contractor maintains proper records, implements corrective actions, and upholds

		principles of confidentiality and non-retaliation throughout the process.
SCWRP Social Management Specialist	The Social Management Specialist is responsible for overseeing the design, implementation, and continuous improvement of the GRM for the SCWRP, ensuring that it is inclusive, accessible, and responsive to all stakeholders, particularly women and other vulnerable groups. Acts as central coordinator of the GRM; ensures timely registration, classification, and acknowledgment of grievances; maintains the Grievance Management System (GMS); ensures adherence to established timelines; coordinates investigations and resolution processes; ensures documentation of outcomes and corrective actions; analyzes trends and systemic issues; supports continuous improvement of the GRM; ensures confidentiality, especially for sensitive cases (e.g., SEA/SH/GBV).	The Social Management Specialist oversees the effective implementation of the GRM, ensuring that it operates in line with environmental and social safeguards, project standards, and principles of fairness and inclusivity. They provide guidance to GRM actors, support the handling of complex and sensitive cases, and ensure that appropriate procedures, including those for SEA/SH/GBV, are consistently applied. In addition, the Social Management Specialist monitors and analyzes grievance data, prepares reports, and uses findings to improve the GRM and overall project performance. They also ensure that the mechanism remains accessible to all stakeholders, particularly vulnerable groups, and that grievances are managed in a transparent, timely, and accountable manner.
Project Executing Agency (PEU)	The SCWRP PEU holds overall accountability for the GRM in line with IDB ESMS and ESPS; ensures the GRM is accessible, inclusive, transparent, and sociocultural appropriate; allocates adequate resources; oversees implementation and performance; ensures integration with the Stakeholder Engagement, Communications and Social Risk Management Operations Manual; submits periodic grievance reports to the IDB; ensures disclosure of	The SCWRP PEU is responsible for the overall oversight and management of the GRM, ensuring it is properly established, implemented, and aligned with contracts, project policies and environmental and social safeguards. It provides direction on the handling of grievances, particularly complex or escalated cases, and coordinates with key stakeholders such as contractors, the Community Liaison Officer(s), Social Management

	aggregated grievance data while maintaining confidentiality.	Specialist and Public Relations and Communications Officer. The SCWRP PEU also ensures compliance with environmental and social requirements, including the proper handling of sensitive complaints such as SEA/SH/GBV in line with established protocols. In addition, it monitors GRM performance, reviews grievance data and reports, and uses this information to support timely decision-making, continuous improvement, and effective project delivery.
SCWRP Public Relations and Communications Officer	The Public Relations and Communications Officer is responsible for managing internal and external communications related to the SCWRP GRM, helping to raise awareness, promote transparency, and strengthen stakeholder confidence in the grievance process.	The Public Relations and Communications Officer supports the GRM by ensuring that stakeholders are well informed about how the mechanism works and how to access it. This includes developing and disseminating clear, accessible communication materials and supporting outreach activities that promote awareness of grievance procedures, reporting channels, and available support. The role also involves coordinating with GRM actors to maintain consistent messaging, promoting transparency and trust in the process, and helping ensure that communications related to sensitive issues such as SEA/SH/GBV are handled appropriately without compromising confidentiality. In addition, the Public Relations and Communications Officer contributes to strengthening stakeholder engagement by incorporating feedback into communication strategies and helping to address

		common concerns or information gaps.
BWA	The BWA acts as a primary implementing and technical partner within the SCWRP GRM, responsible for addressing grievances that fall within its mandate and supporting the overall responsiveness and effectiveness of the mechanism.	The BWA supports the GRM by receiving, coordinating, and resolving grievances related to water services and infrastructure within its mandate. It works closely with the SCWRP PEU and other GRM actors to ensure complaints are properly investigated and addressed in a timely and efficient manner. The BWA also contributes to managing sensitive complaints in line with established protocols, to improve support services. In addition, it supports transparency, accountability, and compliance with relevant policies and procedures while helping to strengthen overall stakeholder confidence in the GRM.
IDB	The IDB provides guidance, monitoring, and supervisory support to ensure that the GRM is properly designed and effectively implemented as part of the SCWRP's overall environmental and social risk management framework.	The IDB provides oversight and guidance to ensure that the GRM is aligned with its environmental and social safeguard standards and good international practice. It reviews project documentation to confirm that appropriate grievance procedures are in place and monitors the implementation of the GRM through supervision and reporting. In addition, the IDB offers technical support to strengthen GRM design and performance, including approaches for handling sensitive grievances such as SEA/SH/GBV, and promotes continuous improvement through lessons learned. It also supports accountability by providing access to an independent mechanism, MICI, where concerns can be raised if grievances are not

		adequately resolved at the project level.
Contractors, Contractor's Personnel (including HSE Officer)	Contractors' HSE Officer establishes and maintains worker and community-level grievance mechanisms consistent with the Project GRM; Acts as a primary focal point for the SCWRP GRM at the site level	The Contractor and the HSE Officer receive and address grievances at site level; ensure non-retaliation and confidentiality; record and report grievances to the SCWRP PEU; escalate serious or sensitive grievances immediately; and comply with national labour laws, policies and OHS requirements
GRM Sub-Committee	Provides strategic oversight on the GRM performance. Comprises of three (3) representatives of 1-2 national support agencies/institutions	The GRM Sub-Committee ensures that systemic issues are addressed; supports high-level decision-making on complex grievances; ensures appropriate remedies, including compensation where required.

Special Protocols for SEA/SH/GBV Grievances

The SCWRP GRM outlines specialized protocols for addressing grievances related to sexual exploitation, and abuse (SEA), sexual harassment (SH), and gender-based violence (GBV). It reflects a commitment to strengthening existing systems so they can respond to sensitive complaints in a manner that is safe, confidential, and centered on the needs and rights of victims. These protocols build on the broader Environmental and Social Management Plan and Gender Action Plan, while aligning with internal operational procedures, including Codes of Conduct, stakeholder engagement processes, and ethical standards.

Special considerations will be applied within the SCWRP GRM to ensure that vulnerable and marginalized groups have equitable, safe, and meaningful access to grievance reporting and resolution processes. These groups include women, youth, the elderly, persons with disabilities, as well as low-income and rural populations who may face barriers to information, access, or participation.

Recognizing the distinct and highly sensitive nature of SEA/SH and GBV complaints, the GRM incorporates tailored procedures to ensure appropriate handling, minimize the risk of harm or retraumatization, and encourage reporting. Central to this approach is the establishment of clear referral pathways that connect victims to medical, psychosocial, legal, and other support services based on their informed consent. This information, including procedures and referral pathways, will be disseminated through targeted trainings, presentations, and periodic refresher sessions for all relevant SCWRP PEU personnel and other key stakeholders, as needed.

The mechanism also promotes awareness among project stakeholders on acceptable behavior, reporting channels, and available support, while reinforcing a zero-tolerance stance toward violations. Through these measures, the GRM aims to provide a trusted, accessible, and survivor-focused system for addressing SEA/SH and GBV-related grievances.

A Survivor-Centred Approach

A survivor-centred approach aims to put the victim's rights at the forefront of all prevention and response measures to ensure that each person is treated with dignity and respect.

By putting the victim at the center of the process, it enables their recovery and reduces the risk of further harm, protects them from retraumatization, and reinforces their agency and self-determination by helping them regain a sense of control over their own life.

Guiding Principles

A survivor-centred approach is applied through the following principles:

- Confidentiality
- Safety, Security and Well-being
- Respect
- Non-discrimination

Confidentiality

Confidentiality means not disclosing any information at any time to any person without the informed consent of the person concerned.

Victims have the right to choose to whom they will or will not tell their story, however, victims must be informed of the limits of confidentiality, including informing them when mandatory reporting procedures are required in line with national laws and policies.

Breaching confidentiality inappropriately can put the victim and others at risk of further harm. If service providers do not respect confidentiality, others will be discouraged from coming forward for help.

Since there are multiple entry points for complaints, a standardized minimal data collection protocol will be applied for all sensitive cases, strictly guided by the principle of "do no harm," and providing options for anonymous or confidential reporting to protect victims' safety, dignity, and privacy.

Exceptions to Confidentiality

There can be exceptions to confidentiality, and it is very important that the victim (especially children/youth and their caregivers) knows what the limits are.

Limits include:

- Situations in which there is the threat of ongoing harm to a child; and where the need to protect them overrides confidentiality.
- Situations in which laws or policies require mandatory reporting of certain types of violence against children.
- Situations in which the victim is at risk of harming themselves or others, including threats of suicide.

Safety, Security and Well-Being

Safety is a fundamental pillar of a survivor-centred approach because without it, victims cannot meaningfully access support, exercise choice or begin recovery.

A survivor-centred approach recognizes that victims may face serious and ongoing risks of further violence or retaliation from perpetrators, people protecting perpetrators, or even from members of their own family. It therefore treats the protection of victims as a primary obligation, not as an optional step.

Safety is treated as holistic; this includes:

- Physical safety and security – preventing further acts of violence or intimidation against victims, their family members/supporters and service providers (those providing care and support).
- Psychological and emotional safety – avoiding actions or interactions that increase fear, distress, shame or trauma.

Putting safety at the center means:

- Always prioritizing the victim's protection from further harm and adhering to the "Do No Harm" principle in all decisions and interactions.
- Assessing risks continuously for victims, their family members/supporters, and those service providers.

Security and well-being are central to a survivor-centred approach. Anyone responding to sexual exploitation and abuse, sexual harassment or gender-based violence must actively assess potential risks to the victim and those around them and take steps to prevent further harm.

Contact, communication and support should be provided in ways that safeguard the victim's physical safety and emotional health, uphold their rights, needs, dignity and privacy, and avoid increasing their exposure to danger or distress. This includes protecting victims from stigmatization, discrimination and retaliation, and minimizing the risk of retraumatization by using sensitive, trauma-informed practices that promote stability, trust and a sense of control in the victim's life.

Respect

Respect is a core element of a survivor-centred approach and must guide every interaction and decision.

It means recognizing that each victim has the inherent right to be treated with dignity, to be believed, and to make their own choices about what happens next.

Practicing respect involves honouring the victim's wishes, values and cultural background; listening without judgment; and allowing them to decide who to tell, what to share, and which actions to pursue.

When service providers uphold dignity and self-determination, they support healing and empowerment. When they fail to do so by dismissing feelings, pressuring decisions, or ignoring expressed wishes they can deepen shame and helplessness, reduce the effectiveness of support, and can contribute to further harm or re-victimization.

Non-Discrimination

All people have an equal right to the best possible assistance without unfair discrimination on the basis of:

- Gender
- Age
- Disability
- Race or ethnicity
- Nationality
- Colour
- Language
- Religious or political beliefs
- Status or social class, etc.

Informed Consent

Informed consent is essential to a survivor-centred approach because it ensures that victims remain in control of what happens to them and to their information. It means that any decision a victim makes is based on a clear understanding of the situation, their options, and the possible consequences.

Service providers must explain in plain language, what support and reporting options exist, what support services can be offered, what the benefits and risks of each option are, and what will happen if the victim agrees to proceed. They must also be transparent about when information may need to be shared with others, any legal or policy limits to confidentiality and when an organization may take action without the victim's full participation to prevent further harm.

In a survivor-centred approach, consent is requested before using or sharing any personal information, and victims are reminded that they have the right to withdraw their consent to participate in the process at any time, without impacting their right to assistance.

National Laws and Policies in Barbados

The SCWRP will align its survivor-centred approach with the national laws and policies of the Republic of Barbados.

- This refers to applicable laws and regulations related to sexual offences, workplace harassment, domestic violence, and child protection.
- Existing national and local GBV response and referral systems including the Barbados Police Service, crisis centres and or women's shelters, health clinics, and specialized NGOs operating in Barbados.
- Where gaps in services are identified (e.g. limited psychosocial support services) the project will explore referral arrangements with reputable NGOs and or the Bureau of Gender Affairs.
- Advocate, where appropriate, with the relevant authorities and NGOs for strengthened survivor-centred support in the project area.

Referral Pathways for SEA/SH/GBV Grievances

The GRM defines and maintains clear, confidential, and survivor-centred referral pathways to ensure that individuals reporting Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), or Gender-based Violence (GBV) are promptly connected to appropriate survivor-centred support services. These pathways will be coordinated and managed through the Social Management

Specialist and SCWRP PEU, in collaboration with established national and local GBV service providers and protection networks, as seen in Annex I.

Upon receipt of a SEA/SH/GBV-related complaint, the GRM will prioritize the immediate safety and well-being of the victim. With the victim's informed consent, a needs-based assessment may be conducted by the Social Management Specialist to identify appropriate support services. This assessment may consider the victim's health, psychosocial, safety, legal, and economic needs, and will only be carried out by the Social Management Specialist, in line with internationally recognized good practice standards.

Based on the outcome of the assessment and the victim's preferences, referrals will be made to relevant service providers, which may include medical care, psychosocial support, legal assistance, and protection services. At no stage shall the victim be compelled to accept referrals or pursue any course of action against their wishes, except where mandatory reporting obligations apply under national law, particularly in cases involving minors.

In situations where a complaint is submitted by a third party, the Social Management Specialist should ensure that appropriate support services are discreetly and promptly engaged, while taking all necessary steps to respect the victim's confidentiality, safety, and autonomy. The GRM will not conduct detailed investigations into SEA/SH/GBV allegations but will facilitate access to services and, where applicable, coordinate with the relevant local authorities, GRM Sub-Committee and the IDB in a manner that does not compromise the victim.

All SEA/SH/GBV complaints will be handled with strict confidentiality, and secure protocols will be in place for the storage and management of sensitive information. The GRM will also ensure that individuals who report such incidents are protected from retaliation. Where the victim provides consent, cases may be referred to the national protection services and legal system in accordance with applicable laws and policies. Access to the GRM does not preclude victims from seeking redress through judicial or other formal mechanisms.

The referral pathway framework will be regularly reviewed and updated to ensure that it remains functional, accessible, and responsive to the needs of victims, and that all relevant project personnel are aware of and trained in its application.

Local non-governmental organizations (NGOs) and charities also provide support for victims and persons affected by sexual exploitation and abuse, sexual harassment and gender-based violence and can be accessed by the complainant. e.g. Business & Professional Women's Club of Barbados (BPW), Supreme Counselling, National Organisation of Women (NOW) Barbados.

Reporting of Grievances

The SCWRP GRM is a structured, transparent reporting framework for grievances, aligned with IDB requirements. All grievances received through any channel will be recorded and securely stored in the Grievance Management System (GMS), which will track each case from intake to closure, monitor response times and resolutions, and generate periodic reports for BWA, IDB and other stakeholders. This system will support accountability, informed decision-making, and continuous improvement of project performance.

Periodic reports shall be prepared on a quarterly basis and shall include, at a minimum: the total number of grievances received, disaggregated by type and source; the status of grievances (resolved, pending, or escalated); average resolution times; the nature and frequency of complaints; identified trends; and a summary of corrective actions implemented. These reports shall be shared with the IDB and relevant authorities to ensure compliance with environmental and social standards.

In addition, the GRM shall support the preparation of semi-annual or annual summaries of grievance data for public disclosure. Such disclosures shall present aggregated information only and should strictly exclude any personally identifiable or sensitive information, thereby safeguarding the confidentiality of complainants.

Specific provisions will apply for the reporting of SEA/SH/GBV-related grievances. The Social Management Specialist within the SCWRP PEU must maintain anonymized records and ensure that incidents are reported internally to the PEU and IDB within twenty-four (24) hours, subject to the informed consent of the victim. Reporting on SEA/SH/GBV cases ought to be limited to non-identifiable information, including the nature of the allegation, whether it is project-related, confirmation that the victim has been referred to appropriate support services, and the status of the case within the project's accountability framework.

Grievances that remain unresolved within the prescribed timeframe or where complainants are dissatisfied with the outcome should be escalated and reflected in reporting to ensure appropriate oversight and resolution. The reporting system shall also highlight systemic risks and recurring issues requiring the SCWRP PEU and IDB's attention.

Overall, grievance reporting shall function not only as a compliance requirement but as a strategic tool to enhance transparency, strengthen accountability, and support evidence-based decision-making. Findings from grievance reports shall be used to refine project design and implementation, improve stakeholder engagement, and ensure the ongoing effectiveness of the GRM.

Monitoring of Grievances

The GRM shall establish and maintain a robust system for the continuous monitoring of grievances in accordance with the IDB's Environmental and Social Performance Standards (ESPS), particularly ESS10 on Stakeholder Engagement. All grievances received through any channel should be formally registered, assigned a unique identification number, and tracked within a centralized GMS to ensure consistency, accountability, and transparency across the SCWRP.

Each grievance will be supported by a comprehensive case file documenting all relevant details, including receipt and acknowledgment dates, description of the issue, eligibility determination, investigation process, communications with the complainant, proposed resolutions, agreed actions, and final outcomes. All records shall be securely stored in line with confidentiality and data protection requirements.

The Social Management Specialist, supported by the SCWRP PEU, will be responsible for monitoring the status and progress of grievances throughout their lifecycle. This should include tracking whether grievances are open, under review, resolved, or escalated, and ensuring that they are addressed within established protocols set out in the GRM policy, such as timely acknowledgment, eligibility screening, and resolution within defined timeframes. Regular updates must be provided to complainants to ensure transparency and maintain trust in the process.

Monitoring activities will also include verification that agreed corrective actions have been implemented and that complainants are satisfied prior to case closure. In parallel, grievance data shall be systematically analyzed to identify trends, recurring issues, and potential systemic risks. These insights must be used to inform adaptive management measures, strengthen environmental and social safeguards, and improve overall project performance.

Continuous Monitoring and Learning

All grievances received will be documented and analyzed to identify trends, recurring issues, or systemic challenges that may arise during project implementation. The monitoring and analysis of grievance data will be used to inform adaptive management measures, strengthen environmental and social safeguards, and improve overall project performance. Regular reporting on grievance trends will support transparency, accountability, and evidence-based decision-making, while lessons learned will be integrated into project operations to prevent recurrence of issues, enhance stakeholder satisfaction and strengthen the overall effectiveness and credibility of the GRM.

Annex I

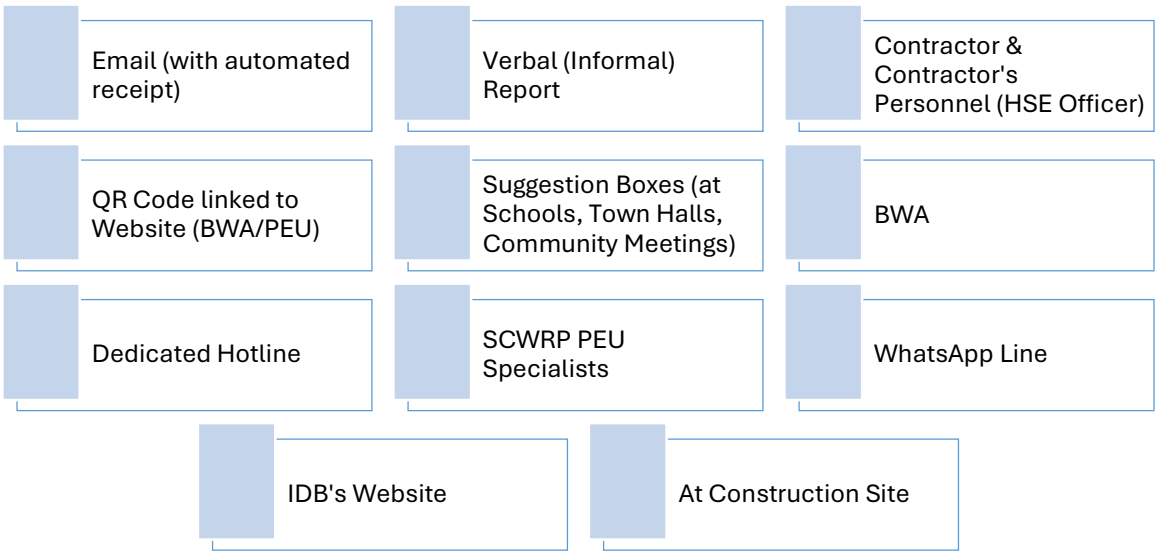
Referral Network/List of National Support Service Providers

ORGANIZATION	ADDRESS	PHONE	EMAIL ADDRESS
SAVE Barbados	3 Durants Terrace, Christ Church	(246) 851 7283	contact@save.bb
The Bureau of Gender Affairs	6th Floor Baobab Towers Warrens, St. Michael	(246) 535-0105	genderbureau@barbados.gov.bb

Business and Professional Women's Club of Barbados (BPW)		(246) 269 4420; (246) 435-8222; (246) 253-5071	https://bpwbarbados.org; bpwbarbadosonline@gmail.com
Advocates Against Domestic Abuse Helpline		(246) 432-2873	aada2019bb@gmail.com
The Barbados Police Service		(246) 211	https://tbps.gov.bb
Family Conflict Unit (The Barbados Police Service)		(246) 430-7323; (246) 430-7316	Family.conflictunit@tbps.gov.bb
Trident Care	20 George Street, Bridgetown, St. Michael	(246) 286-3828	https://tridentcarebarbados.org/
Urgent Care	Highway 5, Boarded Hall, Christ Church	(246) 538-3838	https://urgentcarebarbados.com/
Winston Scott Polyclinic	Ladymeade Gardens, Bridgetown, St. Michael	(246) 536-3400	
Queen Elizabeth Hospital Barbados	Martindales Rd, Bridgetown, St.Michael	(246) 436 6450 Ext. 5540 (246) 511	https://www.qehconnect.com
National Organisation of Women (NOW) Barbados			barbadosnow@gmail.com
Social Empowerment Agency (Child Care Board, Welfare Department, the National Assistance Board, National Disabilities Unit and Resilience and Reintegration Unit)	Six Cross Roads, St. Philip	(246) 536-4673; (246) 535-3131	sea@barbados.gov.bb
Supreme Counselling for Personal Development	#5, 1st Avenue, Belleville, St. Michael, Bridgetown	(246) 538-9769; (246) 836-5601	secretary@supremecounsellingbb.com
Psychiatric Hospital	Black Rock, St. Michael	(246) 536-3001	psychiatrichospital@caribsurf.com
Child Guidance Clinic	Branford Taitt Polyclinic (Black Rock, St. Michael)	(246) 826-3182, (246) 826-3183	http://mentalhealthcommission.gov.bb/ChildGuidanceClinic.html

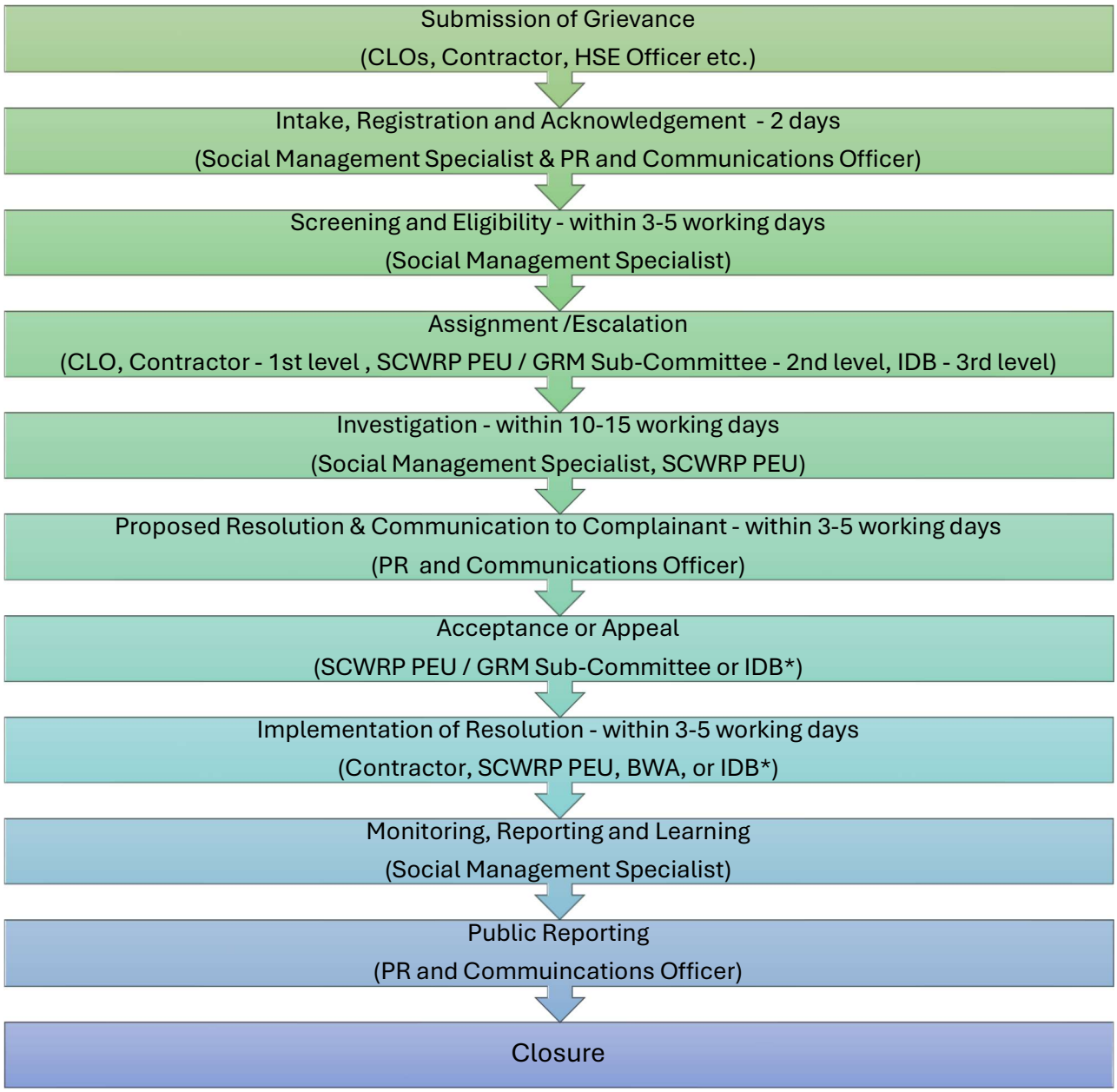
Annex II

Channels to Submit Grievances



Annex III

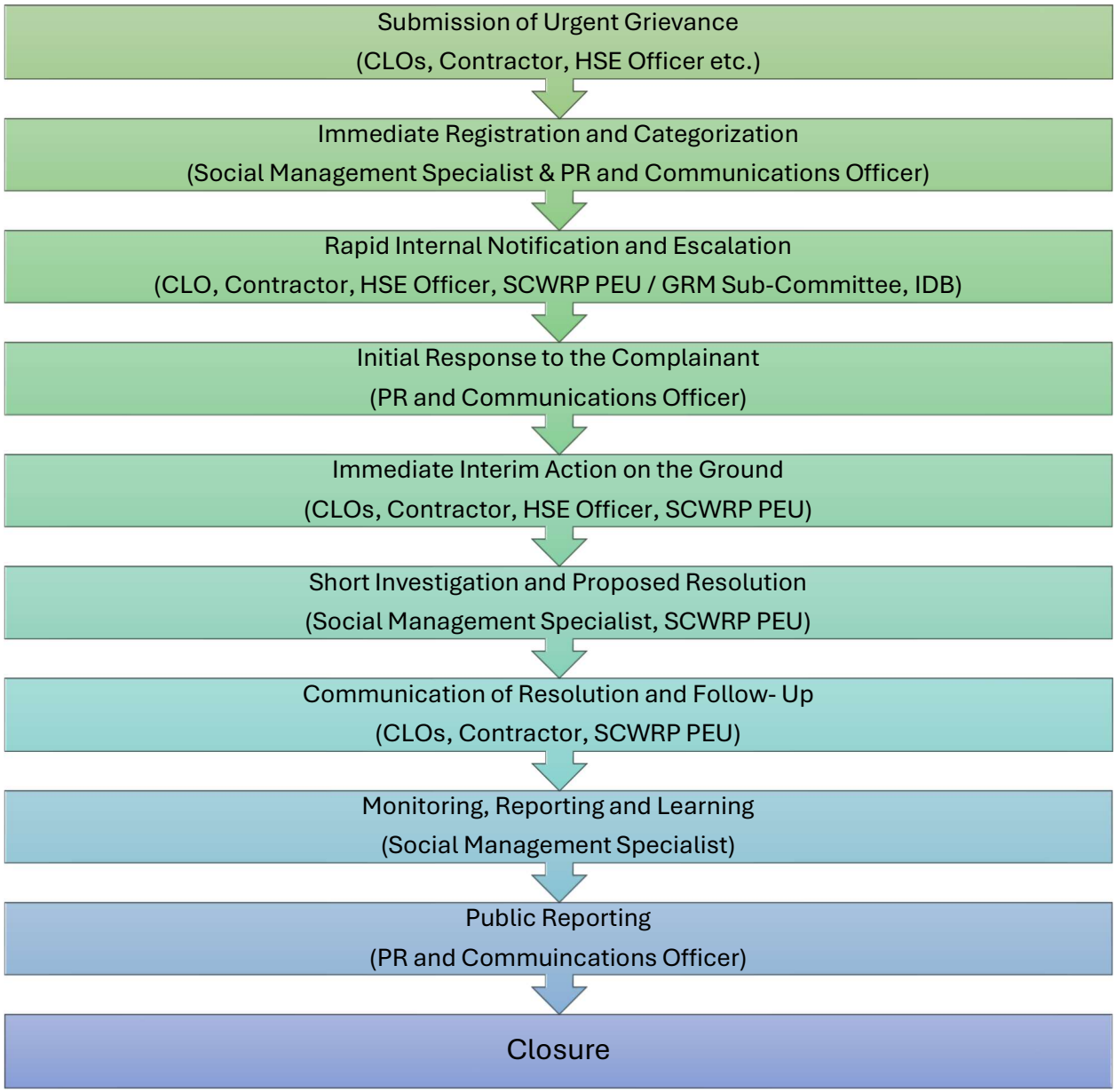
GRM Flowchart – Standard Grievances



*Serious incidents, including SEA/SH/GBV allegations related to the Project, must be reported confidentially to the IDB within the agreed timeframe (often within 24–48 hours). The IDB assists by supervising whether resolutions and appeals are handled fairly and implemented effectively.

Annex IV

GRM Flowchart – Urgent Grievances (to be handled within 24 Hours)



*Serious incidents, including SEA/SH/GBV allegations related to the Project, must be reported confidentially to the IDB within the agreed timeframe (often within 24–48 hours). The IDB assists by supervising whether resolutions and appeals are handled fairly and implemented effectively.

Annex V

SCWRP Grievance Intake Form

(Aligned with IDB, World Bank, UNDP and ESF requirements; suitable for direct entry into a grievance database)

PART 1 – COMPLAINANT DETAILS

Case Number: _____

Date Received: _____

Complainant Type

☐ Community Member
☐ Farmer
☐ Business Owner
☐ Resident
☐ Contractor Employee
☐ Project Worker
☐ Government Agency
☐ NGO
☐ Other: _____

Name *(leave blank if anonymous)*:_____

Gender

☐ Man
☐ Woman
☐ Youth
☐ Elderly
☐ Person with disability(ies) (PwD)
☐ Prefer Not To Say
☐ Other

Age Group:

☐ Under 18*
☐ 18–24
☐ 25–44
☐ 45–64
☐ 65+

**If under 18, authorization or permission must be provided by a parent/guardian.*

Contact Information

Address: _____
_____

Telephone:_____ Email:_____

Preferred Contact Method

☐ Phone
☐ Email

Confidentiality Request

☐ Anonymous
☐ Confidential
☐ Standard Disclosure Permitted

☐ WhatsApp
☐ Letter

Disability/Access Needs (Optional)*

(You do not have to answer this section. It helps us provide appropriate support).

Do you identify as a person with a disability?
[ ] Yes
[ ] No
[ ] Prefer not to say

Disability Category:
[ ] Persons with physical/mobility impairments
[ ] Persons with visual impairments (including low vision and blindness)
[ ] Persons with hearing impairments (including hard of hearing and deafness)
[ ] Persons with speech/communication impairments
[ ] Persons with intellectual disabilities
[ ] Persons with psychosocial or mental health disabilities
[ ] Persons with multiple disabilities
[ ] Other disability (self-described)

If yes, what support or reasonable accommodation do you need so that we can communicate with you effectively? *(You may tick more than one.)*
[ ] Sign language interpretation
[ ] Information in large print
[ ] Information in Braille
[ ] Simple/easy-to-read format
[ ] Assistance to fill in forms
[ ] Physical access support (e.g., ramp, closer meeting location)
[ ] Assistance from a support person of my choice
[ ] Other (please describe): _____

If you have a representative or support person helping you, please provide their name and contact details (optional):
Name: _____
Relationship: _____
Phone/Email: _____

PART 2 – INCIDENT INFORMATION

Date of Incident: _____

Location of incident: _____

_____

GIS Coordinates (if available)

Latitude: _____ Longitude: _____

How Was the Complaint Submitted?

☐ In Person
☐ Phone
☐ WhatsApp
☐ Email
☐ Website
☐ Suggestion Box
☐ Community Meeting
☐ Referral
☐ Other: _____

Is this:

☐ One-Time Incident
☐ Repeated Incident
☐ Ongoing Issue

Project Component

☐ Construction
☐ Traffic Management
☐ Stakeholder Engagement
☐ Environmental Management
☐ Contractor Operations
☐ Utility Services
☐ Other: _____

PART 3 – GRIEVANCE TYPE

☐ Environmental ☐ Social ☐ Health & Safety ☐ Labour ☐ Community Health & Safety ☐ Property Damage ☐ Water Service Impact ☐ Energy Service Impact ☐ Livelihood Impact ☐ Water Quality ☐ Drainage / Flooding ☐ Waste Management ☐ Odour ☐ Land Access ☐ Traffic & Transportation ☐ Noise	☐ Vibrations ☐ Dust/Air Quality ☐ Pollution ☐ SEA/SH/GBV* ☐ Fraud/Corruption ☐ Access Restriction ☐ Business Disruption ☐ Community Relations ☐ Security Concern ☐ Worker Behaviour ☐ Contractor Conduct ☐ Employment / Labour Issue ☐ Other Specify: _____ **Sensitive complaints must be managed through the confidential referral process.*

PART 4 – DESCRIPTION OF THE GRIEVANCE

Describe the issue including:

Date: _____

What happened? When did it occur? Who was involved? Immediate risk/impact?

_____

_____

_____

(Provide supporting documents/evidence i.e. photos, letters, screenshots, witness names. Please note this is not mandatory but may assist in the investigation)

Previous Reporting

Has this issue been reported before?

☐ Yes
☐ No

If yes, provide details including when, to whom, and any action taken:

PART 5 – REQUESTED REMEDY *(Complaint's Expected Outcome)*

What outcome or corrective action would you like to see?

--PLEASE FORWARD THIS FORM TO THE PROJECT EXECUTING UNIT, SCWRP – BWA --

PART 6 – INTERNAL USE ONLY (RESOLUTION PROCESS)

Initial Risk Assessment

☐ Low
☐ Moderate
☐ High
☐ Critical

Immediate Escalation Required?

☐ Yes
☐ No

Escalated To

☐ Contractor
☐ Project Executing Unit (PEU)
☐ GRM Sub-Committee
☐ IDB
☐ Other: _____

Date Escalated: _____

PART 7 – ACKNOWLEDGEMENT

Complaint Received By: _____

Position: _____

Signature: _____

Date: _____

Assigned Officer: _____

Investigation Opened	**Documents Attached:**
☐ Yes ☐ No	☐ Investigation Form ☐ Site Visit Notes ☐ Photos ☐ Other _____ _____

Date Investigation Started: _____

Date Investigation Completed: _____

Investigation Findings *(key issues, facts established, verification notes)***:**

_____

_____

_____

_____

Action Required	**Short Description**	**Due Date**	**Status**
Action 1			
Action 2			
Action 3			
Final Resolution			

Communication of Outcome (to Complainant)

☐ Written response

- ☐ Letter
- ☐ Email

☐ Verbal explanation (if necessary)

Complainant Satisfied

☐ Yes
☐ No

Closure Verified By: _____

Signature: _____

Date: _____

Annex VI

SCWRP – Confidential Victim Intake & Referral Form (SEA/SH/GBV)

(DO NOT FILL IN IF VICTIM DOES NOT CONSENT)

Received By: _____ **Reference Number:** _____

Position: _____ **Date Received:** _____

Time Received: _____

SECTION 1: VICTIM INFORMATION

Name: _____
☐ Victim prefers not to provide name/Anonymous Report

Preferred Contact Method (if follow-up is requested):

☐ Telephone
☐ WhatsApp
☐ Email
☐ Through Representative
☐ No Follow-Up Requested

Contact Information (Optional):_____

Gender

☐ Man
☐ Woman
☐ Youth
☐ Elderly
☐ Person with disability(ies) (PwD)
☐ Prefer Not To Say
☐ Other

Age Group:

☐ Under 18*
☐ 18–24
☐ 25–44
☐ 45–64
☐ 65+

**If under 18, authorization or permission must be provided by a parent/guardian.*

Disability/Access Needs (Optional)*

(You do not have to answer this section. It helps us provide appropriate support).

Do you identify as a person with a disability?

[ ] Yes
[ ] No
[ ] Prefer not to say

Disability Category:

[ ] Persons with physical/mobility impairments
[ ] Persons with visual impairments (including low vision and blindness)
[ ] Persons with hearing impairments (including hard of hearing and deafness)
[ ] Persons with speech/communication impairments
[ ] Persons with intellectual disabilities
[ ] Persons with psychosocial or mental health disabilities
[ ] Persons with multiple disabilities
[ ] Other disability (self-described)

If yes, what support or reasonable accommodation do you need so that we can communicate with you effectively? *(You may tick more than one.)*

[ ] Sign language interpretation
[ ] Information in large print
[ ] Information in Braille
[ ] Simple/easy-to-read format
[ ] Assistance to fill in forms
[ ] Physical access support (e.g., ramp, closer meeting location)
[ ] Assistance from a support person of my choice
[ ] Other (please describe): _____

If you have a representative or support person helping you, please provide their name and contact details (optional):

Name: _____
Relationship: _____
Phone/Email: _____

SECTION 2: NATURE OF REPORT

This report relates to:

☐ Sexual Exploitation
☐ Sexual Abuse
☐ Sexual Harassment
☐ Gender-based Violence
☐ Rape
☐ Physical Violence
☐ Emotional/Psychological Abuse
☐ Stalking/Threats

SECTION 3: CONNECTION TO PROJECT

Name of the Perpetrator (if known or leave blank if anonymous):

_____

☐ Victim prefers not to provide name/Anonymous Report

Date of Incident: _____	**Time of incident:** _____

Location/Area of Incident:

_____

_____

_____

The concern involves:

☐ Project Worker
☐ Contractor Employee
☐ Subcontractor
☐ Community Member
☐ Unknown
☐ Prefer Not to Say
☐ Unsure

SECTION 4: IMMEDIATE SAFETY ASSESSMENT

Does the victim feel safe at this time?

☐ Yes
☐ No
☐ Unsure

Is there an immediate risk of harm?

☐ Yes
☐ No
☐ Unsure

Does the victim require urgent assistance?

☐ Yes
☐ No

If yes, what type of support service required?

☐ Medical
☐ Police
☐ Shelter
☐ Psychosocial Support
☐ Legal Support
☐ Security
☐ Other

Specify:

SECTION 5: VICTIM STATEMENT
Please record only information the victim wishes to share. Avoid detailed questioning.

Summary: _____
_____
_____
_____

SECTION 6: CONSENT

The victim has been informed about available support services and referral options.

Consent to Referral

☐ Yes, I consent to being referred to appropriate support services.
☐ No, I do not wish to be referred at this time.

Consent to Contact

☐ Yes, I consent to being contacted regarding support services.
☐ No, I do not wish to be contacted.

Consent to Share Information
I understand that only the minimum information necessary will be shared with service providers.

☐ Yes
☐ No

Name: _____

Signature: _____

Date: _____

INTERNAL USE ONLY

SECTION 7: REFERRAL ACTIONS TAKEN

Referred To:

☐ Medical Services
☐ Psychosocial Counselling
☐ Gender-based Violence Service Provider
☐ Child Protection Services
☐ Police (with victim consent)
☐ Legal Aid
☐ Shelter Services
☐ Other

Specify: _____

Date of Referral: _____

Referral Made By: _____

SECTION 8: FOLLOW-UP (CONFIDENTIAL)

Case Status:	Communication of Outcome (to the victim)*
☐ Open ☐ Referred ☐ Victim Declined Services ☐ Closed	☐ Written Response (Letter) ☐ Email ☐ Verbal Explanation (If necessary) *(Check all that apply*)*

DECISION TAKEN (*Check all that apply*)*

☐ No Action
☐ Informal Warning
☐ Formal Warning
☐ Training
☐ Suspension
☐ Termination
☐ Reported to the Relevant Authorities (Barbados Police Service)
☐ Other

Specify:

_____

_____

Date Closed: _____

Authorized Officer: _____

Signature: _____

This form is not an investigation tool. Its purpose is to receive disclosures in a safe and respectful manner, assess immediate needs, and facilitate referral to appropriate support services. Detailed interviews, investigations, or requests for evidence should not be conducted by Community Liaison Officers or GRM focal points. Victim safety, confidentiality, dignity, and informed consent must guide all actions taken.

Annex VII

SCWRP GRIEVANCE RESOLUTION & CLOSE OUT FORM

(For PEU/Internal Use Only)

SECTION 1: CASE INFORMATION

Case Number: _____ Assigned Officer: _____

Date Received: _____ Investigation Lead: _____

Date Assigned: _____

SECTION 2: VICTIM'S INFORMATION

Name: _____

☐ Victim prefers not to provide name/Anonymous Report

Preferred Contact Method (if follow-up is requested):

☐ Telephone
☐ WhatsApp
☐ Email
☐ Through Representative
☐ No Follow-Up Requested

Contact Information (Optional):_____

Gender

☐ Man
☐ Woman
☐ Youth
☐ Elderly
☐ Person with disability(ies) (PwD)
☐ Prefer Not To Say
☐ Other

Age Group:

☐ Under 18*
☐ 18–24
☐ 25–44
☐ 45–64
☐ 65+

**If under 18, authorization or permission must be provided by a parent/guardian.*

Disability/Access Needs (Optional)*

Did the complainant identify any disability or access needs relevant to the grievance?

[ ] Yes

[ ] No

[ ] Not stated/Not Known

If yes, indicate the type(s) of disability/access needs reported (if disclosed):

[ ] Persons with physical/mobility impairments
[ ] Persons with visual impairments (including low vision and blindness)
[ ] Persons with hearing impairments (including hard of hearing and deafness)
[ ] Persons with speech/communication impairments
[ ] Persons with intellectual disabilities
[ ] Persons with psychosocial or mental health disabilities
[ ] Persons with multiple disabilities
[ ] Other disability (self-described)

Reasonable accommodations requested during the grievance process? *(tick all that apply)*

[] Sign language interpretation

[ ] Information in large print

[ ] Information in Braille

[ ] Simple/easy-to-read format

[ ] Assistance to fill in forms

[ ] Physical access support (e.g., ramp, closer meeting location)

[ ] Assistance from a support person of my choice

[ ] Other (please describe): _____

Were the accommodations sufficient for effective communication and participation:

[ ] Yes

[ ] No (explain): _____

[ ] Partially (explain): _____

SECTION 3: COMPLAINT SUMMARY

Date of Incident: _____

Date of Incident: _____	**Time of incident:** _____

Previous Reporting Has this issue been reported before? ☐ Yes ☐ No	**Frequence:** _____ **Supporting Evidence:** _____ _____

Location/Area of Incident:

_____

_____

_____

The concern involves:

☐ Project Worker
☐ Contractor Employee
☐ Subcontractor
☐ Community Member
☐ Unknown
☐ Prefer Not to Say
☐ Unsure

SECTION 4: GRIEVANCE CLASSIFICATION

Category

☐ Environmental
☐ Social
☐ Health & Safety
☐ Labour
☐ Community Health & Safety
☐ Property Damage
☐ Water Service Impact
☐ Energy Service Impact
☐ Livelihood Impact
☐ Water Quality
☐ Drainage / Flooding
☐ Waste Management
☐ Odour
☐ Land Access
☐ Traffic & Transportation
☐ Noise
☐ Vibrations
☐ Dust/Air Quality
☐ Pollution
☐ SEA/SH/GBV*

Risk Rating

☐ Low
☐ Moderate
☐ High
☐ Critical

Investigation Required

☐ Yes
☐ No

☐ Fraud/Corruption
☐ Access Restriction
☐ Business Disruption
☐ Community Relations
☐ Security Concern
☐ Worker Behaviour
☐ Contractor Conduct
☐ Employment / Labour Issue
☐ Other

Specify:_____

SECTION 5: INVESTIGATION DETAILS

Investigation Required:	**Documents Attached:**
☐ Yes ☐ No	☐ Investigation Form ☐ Site Visit Notes ☐ Photos ☐ Other _____ _____

Date Investigation Commenced: _____

Investigation Activities Conducted:

☐ Site Visit
☐ Interviews
☐ Review of Contractor Records
☐ Review of Monitoring Data
☐ Review of Safeguards Reports
☐ Consultation with Stakeholders
☐ Other

Specify:_____

_____

Investigation Findings

_____

_____

_____

_____

Date Investigation Completed: _____

SECTION 6: CORRECTIVE ACTION PLAN

Action Required	Responsible Party	Due Date	Status

SECTION 7: RESOLUTION PROCESS

Resolution Proposed:

_____

_____

_____

Date Communicated to Complainant: _____

Method:

☐ Phone
☐ WhatsApp
☐ Email
☐ Letter
☐ Meeting

Initial Risk Assessment ☐ Low ☐ Moderate ☐ High ☐ Critical	**Responsible Party For Action:** ☐ Contractor ☐ Project Executing Unit (PEU) ☐ GRM Sub-Committee ☐ PMO Manager ☐ BWA Management ☐ Contractor Senior Management ☐ IDB ☐ External Agency ☐ Legal/Judicial System

	Date Action Taken: _____

SECTION 8: COMPLAINANT RESPONSE

☐ Resolution Accepted
☐ Resolution Partially Accepted
☐ Resolution Rejected
☐ Unable to Contact

Comments:

_____

_____

_____

SECTION 9: ESCALATION / APPEAL

Was the complaint escalated?

☐ Yes
☐ No

If Yes, escalated to:

☐ Contractor
☐ Project Executing Unit (PEU)
☐ GRM Sub-Committee
☐ PMO Manager
☐ BWA Management
☐ Contractor Senior Management
☐ IDB
☐ External Agency
☐ Legal/Judicial System

Date Escalated: _____

Outcome:

SECTION 10: CLOSURE OF CASE

Date Corrective Actions Completed: _____

Verification Completed By: _____

Date Verified: _____

Closure Determination

☐ Resolved
☐ Resolved with Conditions
☐ Referred to External Mechanism
☐ Closed – No Further Action Required
☐ Closed – Insufficient Information

Lessons Learned / Preventative Measures

Final Sign-Off

Investigating Officer: _____

Signature: _____

Date: _____

Project Coordinator/PEU Representative: _____

Signature: _____

Date: _____

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