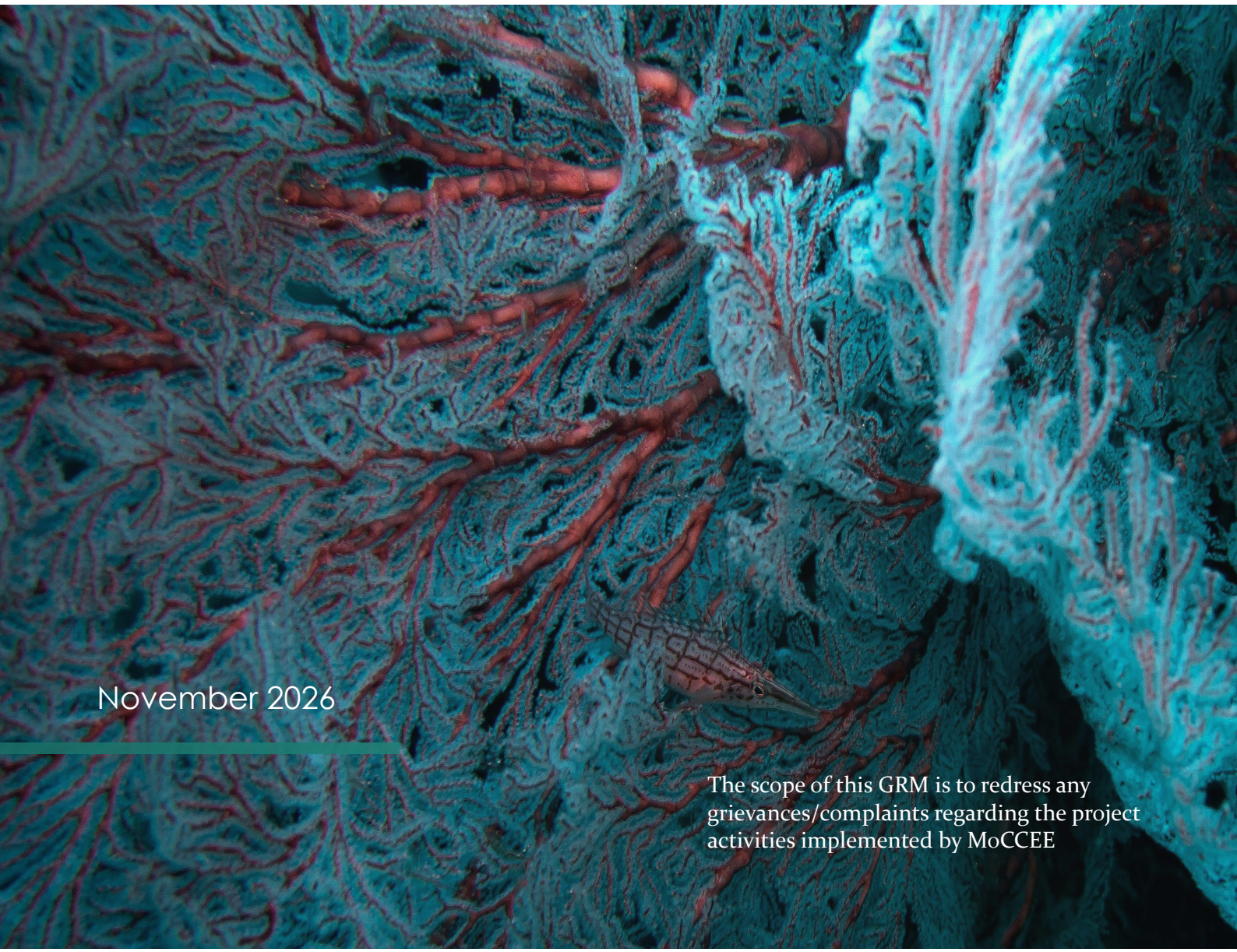
GRIEVANCE REDRESS MECHANISM

Towards Risk Aware and Climate Resilient Communities (TRACT) Project



November 2026

The scope of this GRM is to redress any grievances/complaints regarding the project activities implemented by MoCCEE

Funded By: GREEN CLIMATE FUND

Accredited Entity: UN environment programme

Executing Entity: Ministry of Climate Change, Environment and Energy

Grievance Redress Mechanism

Towards Risk Aware and Climate Resilient Communities (TRACT)

Objective and Scope of the GRM

This Grievance Redress Mechanism (GRM) is a project specific GRM designed for the Green Climate Fund (GCF) funded project "Towards Risk Aware and Climate Resilient Communities (TRACT)" project implemented by Ministry of Climate Change, Environment and Energy (MoCCEE). This GRM is complementary to the Stakeholder Response Mechanism of UNEP and Independent Redress Mechanism (IRM) of GCF.

This GRM is aimed to record, monitor, and resolve grievances/complaints and accommodate where possible any request and suggestions proposed by the project affected parties. The scope of this GRM is to redress any grievances/complaints regarding the project activities implemented by MoCCEE as executing entity.

Details of the GRM

The table below provides details of project specific GRM. The GRM consist of two Tiers. The following are the information regarding Nodal Person for Contact, Composition of Grievance Redress Committee (GRC) committee, Contacts, Communication and Other Facilitation by Project and Timeframe to address grievance.

TABLE 1: GRIEVANCE REDRESS MECHANISM FOR TRACT PROJECT

Tiers of Grievance Mechanism	Nodal Person for Contact	Composition of GR committee	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
First Tier: Project Management Unit (PMU) of TRACT Project, MoCCEE	GESI and Social Safeguards Expert of PMU of TRACT Project	• Project Manager of PMU • GESI and Social Safeguards Expert • Civil Service Staff of MoCCEE • A Representative of Affected Persons (AP) Note: Special consideration will be given to ensure gender balance in the GRC Tier 1.	• Details of GRM should be publicly disclosed on webpage and/or social media of the ministry including contact details of the nodal person in each tier. • Grievances can be reported informally by contacting the PMU through email / telephone / in person. • If the grievance cannot be resolved informally, an aggrieved party should submit a complaint on the Tier I Complaint Form. A copy of the form will be provided to the aggrieved party as evidence of receipt. • Electronic version of the complaint form will be available from the websites and/or social media pages of MoCCEE. • Hard copies of the form will be available from the Ministry reception.	15 working days (extendable once by up to 15 working days with the complainant's written consent)

			• The PMU will keep separate registries for informal and formal complaints and maintain records of all complaints received. • If the complaint is resolved within 15 working days, the PMU should communicate the decision to the aggrieved party in writing. • The aggrieved party should acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 working days to PMU. • If no acknowledgement is submitted by the aggrieved party within this period, then the decision will be considered as accepted. • If the GRC requires more time to resolve the grievance/complaint, this requirement should be communicated to the aggrieved party in writing and the aggrieved party should consent and sign-off the request for the extension to take effect. The extension period can be additional 15 working days. • The PMU will manage and provide feedback to Aggrieved Party on grievances submitted.	

Second Tier: Stakeholder Response Mechanism of UNEP and Independent Redress Mechanism of GCF

Independent Redress Mechanism of GCF (IRM)

- Filing a Complaint: Any affected person or their representative can submit a grievance in any language, with the option to remain strictly confidential.
- Registration: The Independent Redress Mechanism (IRM) acknowledges and officially registers the complaint within five days of receipt.
- Eligibility Screening: The IRM verifies that the grievance is tied to a GCF-funded project and alleges harm resulting from policy or safe-guard violations.
- Initial Assessment: The IRM engages with all relevant stakeholders to clarify the issues and helps complainants select their preferred resolution pathway.
- Problem Solving Track: A voluntary, flexible dispute resolution process where a neutral facilitator helps parties negotiate a mutually agreeable solution.
- Compliance Review Track: An independent fact-finding investigation to formally determine if the GCF or the Accredited Entity breached operational policies.
- Decisions & Agreements: Problem Solving yields a signed agreement, whereas a Compliance Review culminates in an investigation re-port and a final decision by the GCF Board.
- Monitoring & Closure: The IRM actively monitors the implementation of any agreements or Board-mandated remedial action plans be-fore officially closing the case.

Stakeholder Response Mechanism of United Nations Environment Programme (UNEP)

- Project-Level Priority: Affected stakeholders are expected to first attempt resolving their grievances through the specific UNEP project's local redress mechanism.
- Escalation Pathway: If the local mechanism fails or if complainants fear retaliation, the grievance can be escalated directly to UNEP headquarters.
- Independent Oversight: The headquarters mechanism is administered by the Independent Office for Stakeholder Safeguard-related Response (IOSSR).
- Accessible Intake: Complaints can be submitted in multiple languages via a web form, direct email, or physical mail, with an option to request strict confidentiality.
- Eligibility Assessment: The IOSSR screens the complaint to verify it is linked to a UNEP-funded activity and involves a potential safeguard policy violation.
- Fact-Finding: If eligible, the IOSSR investigates the issue, often cross-referencing with local project implementers to understand why local resolution was unsuccessful.
- Facilitation and Mediation: UNEP acts as a mediator, working collaboratively with the complainants and the executing entity to negotiate a resolution.
- Corrective Actions: The final outcome typically involves adjusting project implementation, applying corrective measures, or mitigating the specific harm caused.

Grievance Forms

The Tier 1 grievance form will be attached in the annex 1 of this document.

Grievance registry

- Grievance registry will be maintained by MoCCEE under this GRM.
- Grievance registry will have 3 main aspects which include the following. The format for the grievance register shall be as follows

    - **Grievance receipt and recording**

Grievance No	Date	Complainant Name	Complainant 's address and Contact – Phone	Summary of the Complaint	Current Status

    - **Grievance tracking (Screening and validation)**

The following are the screening procedures to be followed once a complaint is received.

- Establishing complainant's identity
- Establishing that complainant is affected by the project
- Establishing the relationship between the complainant and the project
- Establishing that the issue/s raised by the complainant fall within the scope of the issues that the GRM is mandated to address
- If the complaint is not eligible, it should be notified to the complainant in writing.
- These screening procedures will be undertaken by Tier 1 GRM by PMU.

    - **Closeout (Decisions taken at GRC Meeting)**

GRC meeting date	Meeting Decision	Follow-up required

- These registries will be maintained in Excel format and access will be restricted to the Project Manager and the GESI and Social Safeguards Expert of the PMU. The personal information of complainants will be kept confidential and will not be disclosed without their consent.
- The GESI and Social Safeguards Expert of the PMU is responsible for maintaining and updating the registry. This includes entering each new grievance (informal or formal) within 2 working days of receipt and updating its status after every action, GRC meeting or communication with the complainant.

- The Project Manager is responsible for reviewing and verifying the registry at least once every month, ensuring that follow-up actions are on track, and approving all registry information before it is shared with UNEP.
- Information from the registry will be shared with UNEP in anonymised, aggregated form through the quarterly reporting described under "Reporting to UNEP". Where UNEP needs case-level details (for example, for a serious or escalated grievance), these will be shared only with the designated UNEP focal points, in password-protected files, and the complainant's identity will be withheld unless the complainant has consented to its disclosure.

Grievance resolution process

Tier 1: Project PMU, MoCCEE

- When a grievance/complaint is submitted to the MoCCEE through informal channels or Tier 1 Grievance form the grievance will be recorded in a grievance registry to be maintained by GESI and Safeguards Expert of PMU.
- The grievance registry will be reviewed and verified by the Project Manager of TRACT project on a monthly basis to ensure coordination between Tier 1 and Tier 2.
- Tier 1 Grievance Resolution Committee (GRC) meeting will be scheduled by the GESI and Safeguards Expert of PMU.
- Tier 1 GRC will decide on the following in the initial meeting;
    - A need to invite the complainant/aggrieved party for the GRM process
    - A requirement to collect additional information regarding the grievance or undertake site inspection.
    - if any technical expertise is required to resolve the grievance, Chairman of the GRC can invite such technical persons depending on the issue.
- Meeting minutes will be shared with the GRC Members and complainant/aggrieved party along with a written communication on the decision made by Tier 1 GRC.
- In case consensus cannot be reached among the GRC members or no resolution can be decided by the Tier 1 GRC member, the grievance will be escalated to UNEP as described under "Notification and Escalation to UNEP" below.

Tier 1 Timeframes

The following timeframes apply throughout this GRM, including Table 1 and the Tier 1 Grievance Form (Annex 1):

- **Acknowledgement:** Each grievance will be recorded in the registry and its receipt acknowledged to the complainant within 2 working days.
- **Resolution:** The Tier 1 GRC will resolve the grievance and communicate its decision to the complainant in writing within 15 working days of receipt.
- **Extension:** If the GRC needs more time, the timeframe may be extended once, by up to 15 additional working days, only with the complainant's written consent (a maximum of 30 working days in total).

- **Complainant response:** The complainant should confirm agreement or disagreement with the decision within 10 working days of receiving it. If no response is received within this period, the decision will be considered accepted.
- **Escalation to Tier 2:** If the complainant is not satisfied with the decision, or has not received a decision within 15 working days (or within the extended period agreed in writing), the complainant may proceed to Tier 2. Use of Tier 1 is not a precondition for approaching the GCF IRM, and complainants who fear retaliation may approach the UNEP Stakeholder Response Mechanism directly.

Notification and Escalation to UNEP

a) Unresolved grievances

- **When:** A grievance is considered unresolved when the Tier 1 GRC cannot reach consensus or a decision, when the complainant disagrees with the GRC decision, or when it is not resolved within the timeframes above.
- **Responsible person:** The GESI and Social Safeguards Expert will prepare the notification and the Project Manager will submit it to the UNEP Task Manager for the TRACT project.
- **Timeframe:** Within 5 working days of the grievance being determined unresolved.
- **Channel and content:** Official email from the Project Manager to the UNEP Task Manager, copied to the TRACT project mailbox, followed by a call or meeting where needed. The notification will include the grievance reference number, date received, nature of the grievance, actions taken, GRC decisions and minutes, the complainant's position, and proposed next steps.
- **Follow-up:** The complainant will be informed in writing that the grievance has been escalated and of the Tier 2 options available. The PMU will cooperate with UNEP and implement any agreed actions.

b) Serious grievances

Serious grievances will be notified to UNEP immediately, without waiting for quarterly reporting or for the Tier 1 process to conclude. Serious grievances include those alleging:

  - death or serious injury linked to project activities;
  - sexual exploitation, abuse or harassment (SEA/SH) or other gender-based violence;
  - threats, intimidation or retaliation against complainants or other stakeholders;
  - significant environmental damage or pollution;
  - impacts on land, assets or livelihoods, or harm to vulnerable groups; or
  - other serious breaches of environmental and social safeguards, or issues likely to attract significant public or media attention.

- **Procedure:** The Project Manager will notify the UNEP Task Manager by phone and email within 48 hours of receipt, followed by a written report within 5 working days setting out the initial assessment and proposed actions. Updates will be provided until the grievance is closed.
- **Confidentiality:** The complainant's identity and any identifying details will be withheld unless the complainant consents to their disclosure. Information will be shared only with the designated UNEP focal points, in password-protected files. SEA/SH cases will follow a survivor-centred

approach: no identifying information will be shared without the survivor's informed consent, and the survivor will be referred to appropriate support services.

Monitoring, Evaluation and Reporting of Grievance resolution

It is important to monitor the implementation of the GRM to ensure that all the affected parties (APs) are well informed about the GRM and improve the public image of the project amongst the APs.

The monitoring of the GRM implementation will be undertaken on a quarterly basis by the TRACT PMU. Monitoring and Evaluation will include[1]:

TABLE 2: MONITORING AND EVALUATION OF GRIEVANCE REDRESS MECHANISM

Monitoring	Evaluation
• How many complaints have been raised? • What types of complaints have been raised? • What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, and action being implemented or resolved)? • How long did it take to resolve the problems? • How many people have used the grievance redress procedure? • What were the outcomes?	• Is the GRM effective in realizing the stated goals, objectives, and principles? • Is the GRM capable of responding to the range of grievances specified in their scope? • Is the GRM equipped with an adequate and diverse set of resolution approaches? • Has the GRM adopted measures to improve the resolution approaches, e.g., capacity building, consultation, with technical experts. • Was the GRM effectively integrated into overall Project management

Reporting to UNEP

The PMU will report on the GRM to UNEP, as the Accredited Entity, on a quarterly basis. The GESI and Social Safeguards Expert will prepare a quarterly GRM summary report, which the Project Manager will review and submit to the UNEP Task Manager within 15 working days after the end of each quarter, together with the project's quarterly progress report. A nil report will be submitted for any quarter in which no grievances are received. The quarterly report will cover:

- the number of grievances received, by channel (informal/formal), complainant gender and location;
- the types of grievances received;
- the status of each grievance (not eligible, under assessment, action agreed, action being implemented, resolved, or escalated);
- resolution outcomes and the time taken to resolve each grievance;
- pending follow-up actions, with the responsible party and target date;
- grievances escalated to UNEP or Tier 2, and serious grievances notified during the quarter; and
- lessons learned and proposed improvements to the GRM.

[1] Third Party evaluation of GRM by the Monitoring and Evaluation Specialist of TRACT PMU

Quarterly reports will use anonymised, aggregated data. A summary of GRM performance will also be included in the project's annual progress reporting to UNEP and GCF. Serious grievances are not held for quarterly reporting and are notified immediately as set out under "Notification and Escalation to UNEP".

Awareness Raising and Capacity Building

The GESI and Social Safeguards Expert will be responsible for conducting the online surveys and trainings for the GRM focal points. Training will be provided to all the National Stakeholders including Maldives Meteorological Service (MMS), National Disaster Management Authority (NDMA), Maldivian Red Cresent (MRC), Communications Authority of Maldives (CAM) and Maldives Digital Service (MDS) by GE-SI and Safeguards Expert of PMU.

Annex 1: Tier 1 Grievance Submission Form

(National Emblem)

Form number (for office use):

Ministry of Climate Change, Environment and Energy

……., Maldives

Grievance Form – Tier One

Project: Towards Risk Aware and Climate Resilient Communities (TRACT)

Part 1: Complainant/ Aggrieved Party Information

Name:

ID card number:

Contact number:

Current Address:

Signature:

Part 2: Details of Complainant/ Aggrieved Party

Event leading to Grievance:

Proposed Solution:

Part 3: Received by (for office use only):

Name:

Designation:

Signature:

Date of Grievance submission:

Time of Grievance submission:

Official Stamp

Note:

1. This grievance form is for the first tier of the GRM of the Towards Risk Aware and Climate Resilient Communities (TRACT).
2. If the aggrieved party is not satisfied with the response from the Ministry of Climate Change, Environment and Energy (MoCCEE) or did not get a response within 15 working days of submitting the grievance (or within the extended period agreed in writing), the aggrieved party may proceed to Tier 2 of the GRM.
3. Details of GRM will be available website of the UNEP and GCF website.
4. A copy of this form shall be provided to the aggrieved party upon completion of the Part 3: Received by: section of this form.

Online form:

Grievance Form - Tier One – Fill out form