

Ministry of Education and Research
EDUCATION QUALITY IMPROVEMENT PROJECT
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GRIEVANCE REDRESS
MECHANISM

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Acronyms and Abbreviations

CERC	Contingent Emergency Response Component
ECEC	Early Childhood Education and Care
EQIP	Education Quality Improvement Project
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
IDA	International Development Association
MoER	Ministry of Education and Research
NGOs	Non-governmental organizations
NORD	National Office of Regional and Local Development
PISA	Programme for International Student Assessment
PMT	Project Management Team
POM	Project Operations Manual
SA	Sexual Assault
SEA	Sexual exploitation and abuse
SEP	Stakeholder Engagement Plan
VAC	Violence Against Children
WB	World Bank
UIP	Project Implementation Unit Support

Glossary of Key Terms

Applicant is the person directly or indirectly affected by the Project or interested in the Project who submit a suggestion, concern or grievance or any other requests related to Project implementation.

Complainant is the person directly or indirectly affected by the Project or interested in the Project who submit a complaint.

Feedback Mechanism are tools and methods to collect, analyze, and respond to the opinions and needs of your stakeholders.

Grievance Redress Mechanism - a process for receiving, evaluating, and facilitating resolution of concerns and grievances from project-affected parties related to environmental and social performance of the project as well as other project-related concerns from citizens and other interested stakeholders. This may utilize existing formal and information mechanisms supplemented as needed with project-specific arrangements but does not prevent access to judicial remedies.

Grievance within the implementation of this project, is defined *as any type of feedback, such as requests, proposals, dissatisfactions, complaints, issues, concerns, suggestions, queries* sent by the Project's stakeholders. In the following, within this guide, the notion of "grievance" will be used to mean all the assigned definitions.

Stakeholders are the persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively; Project's beneficiaries (students, teachers, labor market representatives, parents), workers (including Project's workers and institutions' staff), local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g. authorities, and/or nongovernmental organizations, etc.

World Bank's Environmental and Social Standards set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens.

The standards will: (a) support Borrowers in achieving good international practice relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance nondiscrimination, transparency, participation, accountability and governance; and (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement

I. BACKGROUND AND PROJECT'S DESCRIPTION

1.1. Background

The Moldova World Bank Country Partnership strategy identifies an improved alignment of Moldova's education and training systems to the labor market as one of its priorities. Moldova's education system is characterized by low quality of services provided in pre-primary, basic and secondary education, with low transition from lower to upper- secondary schools. Additionally, the pandemic, refugee and energy crisis plus high inflation have revealed the fragility of the country's education system. Due to the COVID-19 school closures, learning is estimated to have dropped by an equivalent of 8 PISA points, eroding about 20 percent of learning gains made by Moldova over the last decade. The gaps between the better-off and disadvantaged students also tend to deepen, due to differential access to technologies among others. While the weaknesses of the basic and secondary education have been addressed by previous investment projects, including those by the World Bank, the learning loss due to COVID-19 pandemic and regional crisis remains largely left unattended.

In accordance with national legislation and the Environmental and Social Standards of the World Bank, the present Grievance Redress Mechanism (GRM) has been developed. The GRM represents an efficient tool for the early identification, assessment, and resolution of grievances from the population regarding project activities, as well as for strengthening the accountability of the parties involved towards beneficiaries. The GRM is an important feedback mechanism that can enhance the project's impact and address concerns and complaints from project-affected parties regarding the project's environmental and social performance in a timely manner.

Addressing complaints from individuals affected by World Bank-financed projects is an important component in managing project-related risks and mitigation strategies. Through the GRM, anyone can provide suggestions, lodge a complaint, or file a grievance, including individuals, local community groups, as well as public and private institutions, who believe they are or could be affected by the activities planned within the Project. Additionally, citizens can express their concerns and situations that could affect their interests and rights, and/or ask questions regarding the implementation of the "Improving the Quality of Education in Moldova" Project.

1.2. Proposed Project Development Objective and key results

The proposed Project Development Objective (PDO) is to (i) improve the learning environment in participating institutions, with an emphasis on supporting disadvantaged students; and (ii) strengthen the capacity of the Ministry of Education and Research for sector management and refugee response.

The project will cover preprimary, primary and secondary education service delivery in project supported schools and kindergartens. Disadvantaged students include poor rural students, girls, children with disabilities and special needs, refugees and students lagging academically.

1.3. Key Results

- participating teachers with improved teaching practices
- improved learning outcomes of students benefitting from project-supported tutoring program (disaggregated by gender, urban/rural, refugee/vulnerability status)
- annual education statistics reports produced and publicly disseminated using data generated by the integrated EMIS for education sector management and refugee response

1.4. Project Components

Component 1: Improving Quality of Teaching through innovations in teaching practices to support learning recovery for disadvantaged students including refugee students, raising the awareness and knowledge of teacher professional standards, teacher quality assessment, in-service teacher training, and periodic assessment of quality of ECEC service delivery.

Component 2: Improving the Quality of Learning Environment in Participating Institutions including the modernization of learning environments in around 200 selected schools, rehabilitation of schools and preschools, and construction of three new high schools.

Component 3: Strengthening the Capacity for Education Sector Management and Refugee Response supporting the development of institutional capacity to design, pilot, evaluate, and scale up the envisaged reforms, while strengthening the capacity for sector management and refugee response.

Component 4: Contingent Emergency Response Component (CERC) will support the country's future response in the event of a natural or manmade disaster or emergency.

II. FRAMEWORK STANDART

The following regulatory acts and documents govern the operation of the Grievance Redress Mechanism (GRM):

- Stakeholder Engagement Plan (SEP);
- Project Operational Manual;
- Administrative Code of the Republic of Moldova no. 116/2018;
- Labor Code of the Republic of Moldova no. 154/2003;
- Law no. 982/2000 regarding access to information;
- Law no. 239/2008 regarding transparency in the decision-making process;
- Law no. 86/2014 regarding Environmental Impact Assessment;
- Law no. 64/2010 regarding freedom of expression;
- Resettlement Policy Framework (RPF);
- Operational Policies and relevant Environmental and Social Standards of the World Bank, including:

- ESS 1: Assessment and Management of Social and Environmental Risks and Impacts
- ESS 2: Labor and Working Conditions
- ESS 4: Community Health and Safety
- ESS 10: Stakeholder Engagement and Information Disclosure

III. DEFINITION OF GRM

Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

The terms ‘grievance’ and ‘complaint’ are used interchangeably.

IV. PURPOSE AND OBJECTIV

This Grievance Redress Mechanism (GRM) is developed in accordance with the World Bank’s Environmental and Social Standard 10 and considering the national legislation requirements.

The purpose of this (GRM) is to provide a feedback mechanism to all Project’s stakeholders in order to ensure the two-way communication between the Project’s and subprojects’ implementation teams and external stakeholders during all Project’s implementation stages. This mechanism represents an instrument for avoidance and mitigation of some potential risks and impacts through the involvement of the stakeholders in the Project implementation process.

The objectives of the GRM are the following:

- to ensure that grievances from stakeholders are well responded and managed in a transparent and timely manner;
- to establish mechanisms to respond to grievances with understanding, transparency, and appropriate procedures;
- to develop a grievance procedure that is accessible, transparent and efficient for the stakeholders;
- to facilitate an effective dialogue and channels of communication openly;
- to manage negative expectations and / or perceptions;
- to improve project’s social performance by evaluating grievances as a basis in taking corrective or preventive action or in developing responsive initiatives.

V. GRM STANDARDS

The GRM will be designed based on a series of principles, so as to efficiently address the needs and concerns of all project stakeholders including affected parties and vulnerable and disadvantaged groups. In organizing and operating the GRM, the following principles will be observed, the description of which is presented in Table 1.

Table 1. Principles of the Complaints Redress Mechanism

Principles	Characteristics
Representativeness	Each project implementing unit will designate a focal point - a person responsible for the operation of the GRM, who will manage complaints within the Grievance Redress Mechanism (GRM).
Accessibility	There will be multiple methods for submitting complaints (written, online, by phone/fax, direct/verbal submission).
Legal framework	The steps to reduce social and environmental impact risks will be in accordance with applicable national legislation as well as the World Bank's Environmental and Social Standards. The Project's GRM will not restrict any interested party from filing petitions/complaints with national courts or via other methods allowed by the Republic of Moldova's national legislation.
Transparency	Complaints will be made public (the complainant's privacy will be protected if requested), as will the settlement process. The gathered experience will aid in the reduction of negative social and environmental impact events, as well as risk mitigation.
Privacy	If confidentiality is required, the parties concerned will use reasonable methods to protect it throughout the complaint resolution process.
Participatory character	Planned actions for addressing complaints will be consulted in advance and coordinated with the complainant and other affected and/or interested parties.
Promptness	All social and environmental impacts will be analyzed immediately, and risk mitigation measures will be taken. After registering the complaint, deadlines for response and resolution will be established, and the complainant will be informed.
Risk mitigation	The GRM will focus especially on participatory activities for risk mitigation, minimizing risks, and preventing negative environmental, social, health, and workplace safety impacts.
Equity and non-discrimination	Everyone shall be treated equally, regardless of their age, gender, color, ethnicity, religion, sexual orientation, or socioeconomic standing. The GRM will help to ensure fairness by eliminating prejudice, encouraging community engagement, and reducing social exclusion.

VI. ROLE AND BENEFITS OF GRM

GRM provides a framework for representation and engagement, both for individuals in communities affected by the project and for institutions responsible for implementing project activities. GRM aims to ensure that project activities align with the interests of all stakeholders involved. Below are the benefits of GRM.

6.1. GRM benefits for affected individuals and communities:

- facilitates access to information regarding Project implementation;
- anticipates and/or reduces negative impacts of the Project on communities and proposes activities for risk prevention and/or mitigation measures;
- provides an efficient method for reporting complaints and presenting proposals related to construction works in affected localities;
- establishes a mechanism for early detection of social risks and immediate reporting of incidents;
- constitutes an equitable and neutral platform for every community member to express concerns or suggestions regarding Project activities;
- provides access and influence over Project decisions and policies that could negatively affect individual and collective interests;
- serves as a monitoring tool for the situation on the ground.

6.2. The role of the GRM for the institutions responsible for implementing the Project

- provides sufficient information to the public about the project implementation process;
- establishes a system of procedures to comply with national policies and World Bank standards;
- presents a clear mechanism for addressing grievances/complaints and disputes that may arise during the Project's implementation process;
- defines roles and ensures the distribution of responsibilities in the complaint resolution process;
- contributes to resolving disputes in the short term;
- facilitates efficient communication between Project implementers and affected individuals;
- helps increase community trust in Project activities and enhances collaboration productivity between parties;
- serves as a local monitoring tool, contributing to avoiding project delays and improving the quality of work performed.

VII. BENEFICIARIES OF THE GRM

The Grievance Redress Mechanism will be available to all interested parties of the project and will serve as a tool for addressing questions, comments, proposals, and lodging complaints (petitions) or providing any form of feedback regarding the activities carried out within the project.

It is anticipated that the GRM will be particularly utilized by:

- Individuals from the beneficiary communities of the Project whose living environment and quality of life may be affected by the Project;
- Individuals from vulnerable groups (women, persons with disabilities, Roma, refugees, etc.) whose interests may be subject to additional risks as a result of project activities;
- Economic agents from localities affected by construction/renovation works whose economic activity may be affected by the construction/renovation process;
- Local public authorities (LPAs) and public institutions from beneficiary localities of the Project, whose operational activities may be affected by project activities. Additionally, they may face dissatisfaction from the population regarding certain project activities.
- Civil society organizations and media interested in project activities, wishing to provide information or communicate citizens' complaints.
- Employees of contracted economic agents whose contractual interests and rights may be violated.
- Other interested parties who can provide suggestions or complaints regarding project activities.

VIII. RESPONSIBILITIES WITHIN THE GRM

The responsibilities for managing and operating the GRM are presented in Table 2. These may be periodically updated by Ministry of Education/Education Quality Improvement Project/National Office for Regional and Local Development in collaboration with the World Bank and other stakeholders involved.

Table 2: Involved Parties and Their Roles within the GRM

Institution	Role within the GRM	Tasks within the GRM
MEC/EQIP	Concept development and overall management of the GRM	<ul style="list-style-type: none"> - informs the public about the operation of the GRM, develops and distributes informational materials regarding the GRM; - distributes and promotes the complaint submission methods, providing information about the responsible institutions and contact details for filing complaints; - provides support and conducts training to focal point staff to improve operational capacity of GRM

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Institution	Role within the GRM	Tasks within the GRM
		<ul style="list-style-type: none"> - receives complaints and forwards them to the responsible parties for resolution; - ensures communication with complainants for the purpose of resolving complaints; - publishes responses to complaints, unless the complainant has requested confidentiality; - monitors the complaints resolution process. - develops and maintains the Complaint Registration and Monitoring Register; - reports to the World Bank on the operation of the GRM.
ONDRL/EQIP	Facilitates the operation of the GRM within the institutions/communities involved in the project.	<ul style="list-style-type: none"> - informs the public from the institutions/communities involved in the project about the functioning mechanism of GRM, the process of filing complaints, providing information about the institutions responsible for filing complaints; - elaborates and distributes informational materials on GRM in coordination with the EQIP/MEC team; - receives complaints and forwards them to the responsible parties for resolution; - ensures communication with complainants for the purpose of resolving complaints in an acceptable manner for the complainant; - develops and maintains the Complaint Registration and Monitoring Register at the regional development agency level. - reports to the Project Implementation Unit (UIP) support and obtains feedback on the results of the GRM.
The institutions involved in the project (high schools, kindergartens)	Ensures the operation of the GRM at the local level.	<ul style="list-style-type: none"> - informs the local community about the operation of the GRM, distributes informational materials regarding the GRM; - displays contact information for receiving complaints (address, phone, email, etc.) within the institution (on notice boards, posters, announcements); - provides assistance to the population in completing and submitting complaints; - collects complaints from individuals - members of the community affected by the project; - facilitates field visits to examine and resolve complaints;

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Institution	Role within the GRM	Tasks within the GRM
		<ul style="list-style-type: none"> - reports violations identified in complaints to national agencies for public order, environmental protection for cases provided by current legislation; - provides feedback to affected individuals and agencies involved in addressing grievances; - completes the Local Complaints Register. - - monitors the complaints resolution process.
Economic agents	Registers complaints, intervenes, and reports.	<ul style="list-style-type: none"> - ensures the implementation of Environmental and Social Management Plans, implements appropriate measures to mitigate negative social and environmental impacts; - displays contact information for receiving complaints (address, phone, email, etc.) prominently near construction/renovation sites and/or in the local town halls; - ensures staff training on the operation of the Project's GRM and the GRM for employees; - registers complaints in the Complaints Register and informs the UIP about their receipt; - informs the complainant about the receipt of the complaint and the examination period; - coordinates with the complainant on the action plan to address the complaint; - repairs damages caused by construction/renovation works to infrastructure, public and private property; - repairs damages and compensates for losses caused to affected employees due to non-compliance with contractual obligations and/or failure to meet working conditions, safety requirements caused by the employer's fault. - informs the complainant about the actions taken to address the complaint and the timeframe for their completion; - maintains and updates the Complaints Register at the operator/economic agent level; - - informs ONDRL/EQIP about the update of the complaint status (under review/solved).

IX. CATEGORIES AND TYPES OF COMPLAINTS

Given the stages of EQIP implementation and the planned activities, complaints can be classified into several categories, as follows:

Category 1 - related to the overall project or sub-project implementation process, including the fairness of the implementation process, lack of information, transparency;

Category 2 - related to environmental and social risks (including gender-based violence and SH/SEA) and their impact or mitigation measures;

Category 3 - related to labor risks and conditions, including health and safety aspects, construction impacts, workplace accidents;

Category 4 - related to abusive use of funds/lack of transparency or other concerns related to financial management;

Category 5 - related to the development/modernization of educational programs, new study programs, and other related guidelines and documents within the Project;

Category 6 - related to the consultation and involvement process during Project implementation;

Category 7 - others.

Considering the definition of "Complaints" provided in the Glossary of key terms above, the following types of grievances will be differentiated in the process of managing and monitoring grievances:

- *Complaints*: an issue, concern, problem, dissatisfaction/disagreement, or claim (perceived or real);
- *Requests for information and inquiries*: requests for clarifications or additional information regarding the activities or implementation of the Project;
- *Suggestions and proposals*: any suggestions or proposals for improving the project implementation or implementing specific Project activities.

The lists of categories and types of complaints may be supplemented or modified in the event of receiving other categories of complaints. Table 3 presents other possible categories of complaints. The established categories and types will be considered to maintain the complaints tracking register, the template of which is attached as Annex 4 to this document.

Table 3. Possible Categories of Complaints

Category	Possible Complaints
Blocking access routes for transportation and individuals	<ul style="list-style-type: none"> - Access roads are blocked or closed during construction; - Public transportation is redirected; - Activities of some public institutions and private enterprises; - The population does not have access to some agricultural lands and cannot carry out agricultural work.

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Category	Possible Complaints
Noise pollution / Noise	<ul style="list-style-type: none"> - It is noise and vibrations that disturb individuals, the activities of public institutions, etc.; - Work is being done after 6:00 PM with noise and vibrations; - The announced work schedule and commitments to reduce noise pollution impact are not being respected.
Air pollution	<ul style="list-style-type: none"> - Large amounts of dust are generated by the machinery and transportation involved in the construction process; - Solid waste or dried vegetation is being burned.
Soil pollution	<ul style="list-style-type: none"> - Impairment of the humus layer; - Leaks of oils or other pollutants occur; - Soil compaction with heavy equipment.
Water pollution	<ul style="list-style-type: none"> - During construction, there are leaks of oils or other pollutants; - Surface water pollution with solid waste; - Domestic wastewater is discharged, contaminating groundwater.
Violation of the rights of individuals permanently or temporarily expropriated	<ul style="list-style-type: none"> - Non-compliance during construction with the established boundaries of the lands for carrying out the works. - Non-payment within the established period of the determined compensation. - Disagreement with the calculated compensation amount.
Damages to public property	<ul style="list-style-type: none"> - Inappropriate behavior towards religious objects, archaeology, and historical monuments. - Trees from public areas have been felled or affected.
Damage to public infrastructure (roads, bridges, canals, power lines, etc.)	<ul style="list-style-type: none"> - The contractor is using local roads, bridges not specified in the Traffic Management Plan. - Cracks have appeared in public infrastructure. - Unannounced interruptions and/or damage to water, gas, sewage networks, telecommunication cables, etc.
Non-compliance with the work schedule	<ul style="list-style-type: none"> - Excessive lighting or noise pollution at night
Exceeding the work area boundaries	<ul style="list-style-type: none"> - Failure to comply with the designated work area.
Accumulation of waste.	<ul style="list-style-type: none"> - Construction and/or household waste is deposited in unprepared and unauthorized areas not designated for this purpose.
Disturbing public order.	<ul style="list-style-type: none"> - Inappropriate social behavior of workers in localities and on construction sites. - Consumption of alcohol on the construction site and other prohibited substances with community representatives.
Danger to life and health	<ul style="list-style-type: none"> - Traffic accidents or speeding in localities. - Contractor employees involved in work without protective equipment. - Abandoned construction sites and work locations, unmarked and/or unprotected, posing potential hazards to traffic or pedestrians.
Gender-based violence	<ul style="list-style-type: none"> - Lewd communication, sexual harassment, human trafficking, etc. - Risks of community infection with HIV/AIDS, STDs, COVID-19, etc. - There are women present on construction sites who are not employees of the Contractors or children, etc.

Category	Possible Complaints
Damage to private property, including crops	<ul style="list-style-type: none"> - Storing construction materials on farmers' land without their consent. - Road damage caused by construction works. - The contractor used land not designated for this purpose for maneuvering transport.
Violating the rights of employees	<ul style="list-style-type: none"> - Hiring children for labor. - Employing community members without employment contracts. - Discriminating against individuals in temporary employment opportunities. - Violating employees' contractual rights (non-payment of wages, failure to adhere to established work schedules, physical and mental harassment, etc.).

X. PUBLIC AWARENESS REGARDING GRM FUNCTIONING

All stakeholders: institutions and affected individuals must be informed about the existence of the GRM and the methods of its utilization. To this end, continuous information dissemination to Project beneficiaries will be ensured, especially to institutions in the localities where renovation/construction works will take place, through informative sessions regarding GRM operation procedures and their responsibilities at the local level regarding the reception and resolution of complaints. Additionally, stakeholders involved in the GRM management will receive support from MEC/EQIP and ONDRL/EQIP throughout the project to ensure the effectiveness of the GRM.

Information about the grievance redress mechanism will be available on the Ministry of Education and Research's website (EQIP section) and on the website of the National Office for Regional and Local Development, and will be included in all communications with project stakeholders through the methods and tools outlined in the Stakeholder Engagement Plan (SEP) and the project's Communication Plan, including email, website, informative panels, workshops, meetings, discussions, etc. Information about the GRM will also be included in the project's communication campaign.

Information regarding the operation of the GRM will be displayed on all informative panels placed in institutions/localities affected by the project and on construction sites in areas accessible to workers of economic agents. Additionally, this information will be distributed in online groups (Viber, WhatsApp, Facebook) of institutions in affected localities.

EQIP will provide information regarding the scope of the GRM, eligible criteria for submitting complaints, the complaint submission procedure, the examination process, examination timelines, as well as the principles of confidentiality and the right to submit anonymous complaints.

Furthermore, the GRM will be proactive and will focus on activities to prevent situations of risk for possible damages to individuals and communities in the localities where project activities are carried out. They will use the following methods to communicate with the public:

- Information through mass media, including local:
- Announcements / informative notes placed on notice boards of the local City Hall and economic agents;

- Meetings with the population;
- Printed materials such as posters, pamphlets, flyers, informative letters, etc.;
- Announcements posted on the official websites and social media pages of MEC, ONDRL, and institutions affected by the project.

Information regarding GRM will be provided throughout the project duration. Interested parties will be continuously informed about GRM results and any changes made.

XI. FOCAL POINTS OF GRM

At all levels of the project, for the efficient management of the GRM, EQIP and sub-project management teams will appoint a focal point responsible for operating the GRM.

The focal point will inform the public about the Grievance Redress Mechanism, which is a tool for identifying, examining, and resolving public complaints regarding the planning and implementation of works and activities carried out within the project, in accordance with the provisions of the World Bank's Environmental and Social Standards and National legislation.

The designated focal point member for recording complaints at the local level will register the complaints and keep records in the complaints register. The designated focal point member will consult with the social development specialist from MEC/EQIP or ONDRL/EQIP regarding challenging situations that they are unable to handle independently. Additionally, the focal point will provide monthly updates to the social development specialist at Project Implementation Unit (UIP) support regarding the complaints, including their current status.

All focal points within the project will be trained and empowered to address a wide range of issues, including those related to GBV and VAC. It is essential that all GRM staff understand the guiding principles and ethical requirements for addressing GBV and VAC survivors. All reports must remain confidential and be immediately forwarded to the service provider represented in the GBV and VAC compliance team. In cases of GBV and VAC warranting police intervention, focal points must appropriately escalate the complaint to: (i) the authorities; (ii) the service provider; and (iii) the management for further action. The employer and the World Bank must be notified immediately.

The service provider will also provide support and guidance to the GBV and VAC focal points as needed. The service provider will have a representative in the GBV and VAC compliance team and will be involved in addressing complaints related to GBV or VAC. The service provider will develop and conduct mandatory training for employees on GBV and VAC.

Focal Point MEC/EQIP

Responsible - specialist in social development

- The Social Development Specialist receives and records complaints in the Complaints Register received from all three project components, informs the EQIP Coordinator, sends confirmation of receipt of the complaint to the complainant, prepares the minutes signed by all parties involved in resolving the complaint, informs the complainant about the results of the complaint review, includes the decision on the resolution of the complaint in the Complaints Register, prepares and reports to the Bank.
- The Project Coordinator designates the person(s) responsible for resolving the complaint, gets involved, and participates in meetings with complainants in complex situations.

Focal point ONDRL

Responsible - specialist in social development

- The Social Development Specialist receives and records complaints in the Complaints Register, informs the ONDRL/EQIP coordinator, sends confirmation of receipt of the complaint to the complainant, prepares the minutes signed by all parties involved in resolving the complaint, informs the complainant about the results of the complaint review, includes the decision on the resolution of the complaint in the Complaints Register, collects GRM reports from focal points in high schools, kindergartens, contractors, analyzes reports from institution/contractor management teams, and reports to MEC/EQIP.
- The project coordinator designates the person(s) responsible for resolving the complaint, gets involved, and participates in meetings with complainants in complex situations.

Focal Point Schools/Kindergartens

Responsible - the manager of the institution

- A MSR (possibly the Secretariat) designated by the institution's manager receives and records complaints in the Complaints Register, informs the institution's manager, sends confirmation of receipt of the complaint to the complainant, prepares the minutes signed by all parties involved in resolving the complaint, informs the complainant about the results of the complaint review, includes the decision on the resolution of the complaint in the Complaints Register, and reports to ONDRL/EQIP.
- The institution's manager designates the person(s) responsible for resolving the complaint, gets involved, and participates in meetings with complainants in complex situations.

Contractor focal point

Responsible - site manager

- The site manager appointed by the contractor receives and registers the complaints in the Register of received complaints, informs the coordinator of the implementation team, sends to the complainant the confirmation of receipt of the complaint, draws up the minutes signed by all parties involved in the resolution of the complaint, informs the complainant about the results of the examination of the complaint, includes the decision regarding the resolution of the complaint in the Complaints Record Register, and reports to ONDRL/EQIP
- The contractor designates the person/persons responsible for resolving the complaint, gets involved, participates in meetings with complainants in complicated situations.

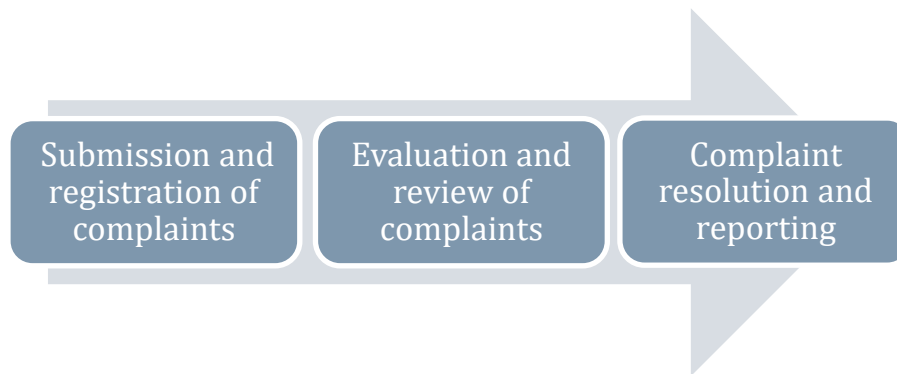
Responsibilities for managing the GRM system include the following and may be updated from time to time in consultation with the ministerial management team and World Bank operational teams:

- General management of the GRM system;
- Developing and maintaining awareness and information about the GRM system;
- Collecting complaints;
- Sorting/classifying complaints;
- Registering complaints;

- Notifying the complainant of the complaint examination deadline;
- Thoroughly examining issues, including establishing causation between project activities and alleged damages;
- Making decisions based on such examination;
- Handling appeals or maintaining ongoing communication with complainants to resolve issues amicably;
- Publishing responses to complaints, unless complainants request otherwise due to confidentiality or other concerns;
- Organizing and implementing informational materials and awareness campaigns;
- Reporting and providing feedback on GRM results.

XII. COMPLAINTS REMEDY PROCESS

The complaint redressal process is divided into 3 phases:



12.1. Filing complaints at GRM levels

Multiple methods of filing complaints are established to maintain confidentiality and avoid conflicts of interest among the parties. Additionally, complaints can be submitted anonymously if the complainant wishes, or if they have the option to request confidentiality (where their identity will not be disclosed without their consent).

Each sub-project management team at the MEC, ONDRL, institution (high school/kindergarten), and Economic Agent establishes and provides contact information for filing complaints to all stakeholders.

Students, parents, teachers, and other staff will be informed through existing communication channels within the institution about the possibility of addressing any type of requests, grievances, suggestions, and complaints related to the Project and specific activities funded within the institution.

Each component of the project will have its own channel for filing complaints through which citizens, individuals affected by the project, employees of the economic agents contracted for project works, or institutions can file complaints regarding project-funded activities.

- the unit's implementation webpage on the Internet;
- the email address provided by the implementing units;

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- in writing to the postal address provided by the implementing units;
- by phone number, including Viber, WhatsApp provided by the implementing units;
- a suggestion box for collecting complaints will be established in a publicly accessible area in the implementing units for anonymous grievances, complaints about sexual assault/harassment (SA/SH), and gender-based violence (GBV). These boxes will be identifiable by project EQIP lettering and emblem.
- addressing a complaint by handing it directly to the project representative during field visits (project manager, civil works engineer, environmental and social specialists)
- for the Project's workers and anonymous grievances can be used the phone: +373xxxxxx.

The project will ensure the flexibility of available channels for complaints, as well as accessibility to contact information for individuals filing complaints. The MSR has multiple levels through which complaints can be registered in a secure and confidential manner.

National level by:

a) Ministry of Education and Research

Internet	https://mecc.gov.md/ro/petitii-online
e-mail	cancelaria@mec.gov.md
in writing or in person	Piața Marii Adunări Naționale nr. 1, Casa Guvernului, MD-2033 Chișinău, Republica Moldova
phone :	+373 (0) 22 23 35 60
Other:	<ul style="list-style-type: none"> - Verbal during meetings, consultations, or other information and engagement activities. Verbal complaints will be noted in the minutes of the meetings. - Phone calls to MEC staff; - Written complaints collected through suggestion boxes.

b) EQIP

<u>Internet</u>	www.mec.gov.md : section Programs and Projects → subsection EQIP → GRM
<u>e-mail</u>	equip@mec.gov.md
<u>in written form:</u>	bd. Ștefan cel Mare și Sfânt 180, et.13, bir. 1305 EQIP, Chișinău mun.
<u>Phone :</u>	+373 (0) 22 23-25-02
others:	<ul style="list-style-type: none"> - Verbal during meetings, consultations, or other information and engagement activities. Verbal complaints will be noted in the minutes of the meetings. - Phone calls to EQIP staff; - Written complaints collected through suggestion boxes.

- c) National Office for Regional and Local Development Office (NORLD) Project Implementation Unit (ONDRL/EQIP)

<u>Internet:</u>	www.ondrl.gov.md: section Project → subsection EQIP → GRM rubric
<u>e-mail</u>	equip@ondrl.gov.md, reclamatii@ondrl.gov.md
<u>In written</u>	bd. Ștefan cel Mare și Sfânt 124, et.3, bir. 334, ONDL/EQIP, Chișinău mun.
<u>phone</u>	+373 (0) 60 80 33 70
others	<ul style="list-style-type: none"> - Verbal during meetings, consultations, or other information and engagement activities. Verbal complaints will be noted in the minutes of the meetings; - Phone calls to ONDRL/EQIP staff; - Written complaints collected through suggestion boxes.

Local level to:

- a) The administration of the educational institution (high school, kindergarten) involved in the project;
- b) Contractors/business agents who will carry out the renovation/construction works under Component 2 of the Project.

<u>Internet:</u>	The information will be updated for each institution/contractor/sub-project separately
<u>e-mail:</u>	
<u>Written:</u>	
<u>Phone:</u>	
<u>Others:</u>	

The complaint submission form will be available in two languages: Romanian and Russian

World Bank level to:

- a) World Bank's Grievance Redress Service (GRS).

<u>e-mail</u>	grievances@worldbank.org
<u>written:</u>	The World Bank Grievance Redress Service (GRS) MSN MC 10-1018 1818 H St NW Washington, DC 20433, USA

- b) Local Office of the World Bank

<u>e-mail</u>	moldova_contact@worldbank.org
<u>written:</u>	Str. Pușkin 20/1, MD-2012, Chișinău, Republica Moldova
<u>Phone:</u>	+373 (0) 22 26 22 62 / (0) 22 26 22 36

The World Bank's SSR online platform	https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service https://wbgcmsgrs.powerappsportals.com/en-US/new-complaint/
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The complaint submission form is presented in Annex 1. The proposed submission form is an optional form for the complainant to submit complaints personally or anonymously. Complaints submitted in any form will be accepted and reviewed.

Complaint submission forms will be available to participants at all organized meetings, consultation or information activities, and engagement related to the implementation of the Project/sub-project.

Confidentiality and Conflict of Interest

The complainant's data confidentiality is protected in accordance with the provisions of the Republic of Moldova Law No. 133/2011 on the protection of personal data.

Complaints can also be submitted anonymously; these will also be analyzed and resolved, and confidentiality will be ensured in all cases, including when the complainant is known. A written response to an anonymous complaint will be possible if the complainant provides a minimum of data (e.g., an address to which the response should be delivered), thus enabling feedback to be provided. Notifications regarding anonymous complaints and responses to anonymous complaints can be:

- provided during information and engagement activities in accordance with WB ESS 10;
- placed on informative panels in the respective institutions;
- posted on the institutions' websites;
- through social media networks.

According to national legislation, anonymous complaints are not investigated. As a result, the general public will be aware of the option to file anonymous complaints, but they will be recommended to do so through channels other than the official platform. The initiative will guarantee that the existing channels for complaints are flexible and accessible to those who desire to submit them.

At any time, individuals can file a complaint with the National Anti-Corruption Hotline at 0 8005 5555.

12.2. Complaint registration procedure

Each party responsible for the functioning of the GRM will have a Complaints Registration Register to monitor the resolution process. All complaints, including anonymous ones, will be recorded in writing and stored in an electronic database. Complaints will be logged with a number to facilitate tracking through the database.

All implementing entities will notify EQIP of any registered complaint by dispatching a copy of the completed form submitted by the Claimant and registered, and of any change in the status of the complaint, thus ensuring the continuous and simultaneous updating of all Registers held by the involved parties.

All complaints meeting the admissibility criteria (related to the project) are forwarded to all interested parties (responsible) for their opinions/proposals regarding the complaints or reports, suggestions provided by the complainants.

The registers will be held in electronic form and will have the following compartments:

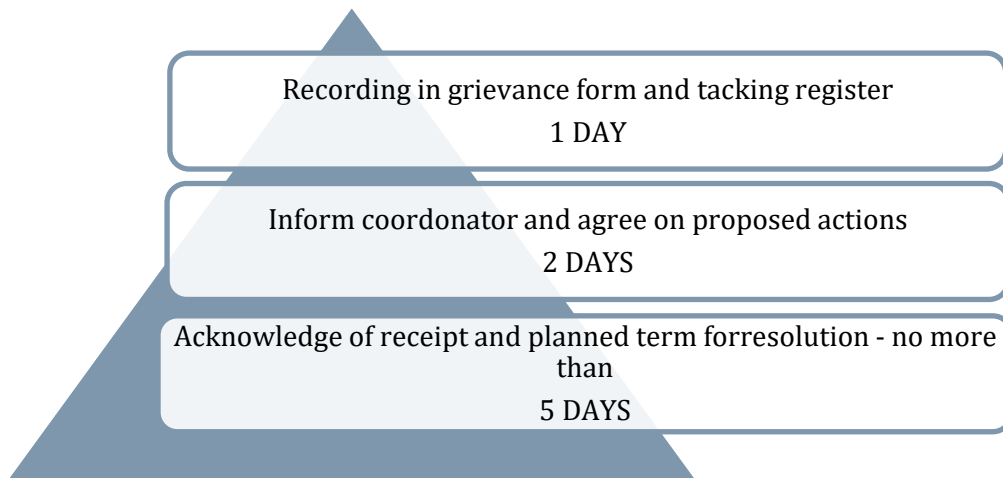
- Complaint number assigned by the Project Implementation Unit (UIP)
- Date of receipt/filing of the complaint
- Category/subject of the complaint
- Description of the complaint
- Proposal/request of the complaint
- Data about the complainant (Person/Location)
- Decision/Solutions
- Resolution status
- Date of response provided
- Additional comments

The complaint will be registered at the level at which it was received, using the form in Annex 2.

12.2.1. Complaints registration procedure at project level

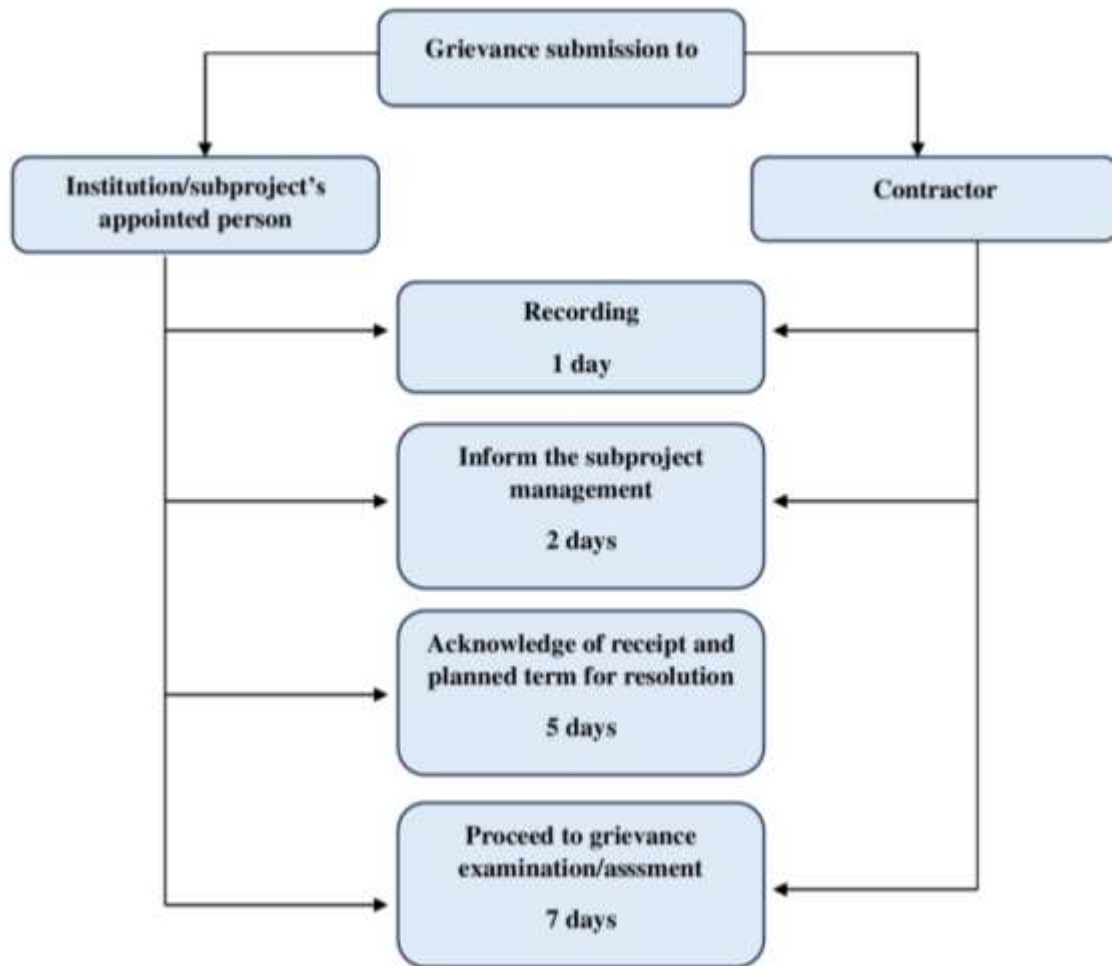
- 1) The responsible person for registering complaints from the focal point of the project implementing unit will complete the Complaint Registration Form (Annex 2) and record the complaint in the Complaints Register within one day of receiving the complaint, and will inform the EQIP coordinator about the received complaint.
- 2) The project coordinator will designate the person(s) responsible for addressing the complaint within two days of receiving the complaint.
- 3) The responsible person for registering complaints from the focal point will send the complainant confirmation of receiving the complaint within a maximum of five days from the date of receipt, and will inform the complainant about the estimated timeframe for expecting a response. For procurement-related complaints, the confirmation of receipt will be submitted within the timelines provided by the Procurement Regulations. Note: this provision does not apply to anonymous complaints. (Annex 3)
- 4) The complaint resolution process will begin after the complaint is registered and the actions/measures to be taken to resolve the complaint are coordinated among all involved or to be involved members.

The procedures and terms for registering complaints are shown in Figure 1 below.

Figure 1. Grievances recording procedure at Project level

12.2.2. The procedure for registering complaints at sub-project level by institutions and contractors/economic agents.

- 1) The person responsible for registering complaints from the focal point of the project implementing unit will complete the Complaint Registration Form (Annex 2) in the Complaints Register within one day of receiving the complaint and will inform the project implementing unit coordinator about the received complaint.
- 2) The coordinator will designate the person(s) responsible for addressing the complaint within two days of receiving the complaint.
- 3) The responsible person for registering complaints from the focal point will send the complainant confirmation of receiving the complaint within a maximum of five days from the date of receipt and will inform the complainant about the estimated timeframe for expecting a response. For procurement-related complaints, the confirmation of receipt will be submitted within the timelines provided by the Procurement Regulations. Note: this provision does not apply to anonymous complaints. (Annex 3)
- 4) The complaint resolution process will begin after the complaint is registered, and actions/measures to be taken to resolve the complaint are coordinated among all involved or to be involved members.
- 5) Complaints made verbally during meetings, public consultations, or other activities will be noted in the meeting minutes and subsequently recorded in the Complaints Register. The minutes will include the answer provided or the agreed timeframe and channels for answering.
- 6) For complaints received by economic agents/contractors at the site level, whether verbal or by phone, it will not be necessary to confirm receipt of the complaint. In such cases, the economic agent/contractor will focus directly on resolving the issue as soon as possible at the site level, informing the sub-project manager. The steps to be taken by institutions (high schools, kindergartens) and economic agents/contractors after receiving a complaint are presented in Figure 2.

Figure 2 Grievances recording procedure at subproject level

12.3. Complaint resolution procedure

After designating the person responsible for addressing the complaint, the involved parties will ensure the absence of conflicts of interest, that all individuals involved in the review process have no personal, professional, or material interests regarding the outcome of the complaint review, as well as no personal or professional connections with the petitioners or witnesses.

The complaint resolution procedure begins with determining the eligibility of the complaint. Complaints are considered eligible if they are directly or indirectly related to the EQIP project and fall within the scope of the Complaints Mechanism. Conversely, ineligible complaints are those not related to EQIP activities or the economic agents involved in implementing project activities.

All complaints, including those considered ineligible, are recorded in the Complaints Register. Ineligible complaints will be rejected, but the complainant will be informed of the reasons for this. In the case of an eligible complaint, the complainant will be notified within 5 days of receipt and provided with an estimated timeframe for resolving the complaint or providing a response to the requested information.

According to the National Law on Petitions No. 190/1994, as amended, complaints are processed within 30 working days from the date of registration. This timeframe applies to complaints requiring examination and identification of corrective actions. Additionally, responses to certain questions or suggestions and requested information will be provided as soon as possible to ensure an efficient and proactive two-way communication process with the project's stakeholders.

When additional time is needed for examination and corrective action, the deadline for reviewing and resolving the complaint may be extended in the following situations:

- Additional consultations are required to prepare the response to the complaint;
- The complaint relates to a complex volume of information or if additional documents or activities are necessary to prepare the response;
- Intervention by state institutions is necessary, and legal provisions provide for a longer response time to requests.

The complainant will be informed about the extension of the deadline by presenting the reasons for extending the examination and/or resolution period and will be provided with an approximate timeframe for resolving the complaint.

The person responsible for managing GRM records will enter this data into the Complaints Register and inform the complainant about the estimated timeframe for resolving the complaint.

To examine the complaint, the responsible person will obtain information from the primary source to have access to all circumstances and parties involved in the complaint.

Investigating the complaint may involve site visits for meetings with individuals who could contribute to resolving the reported issue, clarifying the situation at hand, gathering opinions from other stakeholders, and examining documents.

In cases where the submitted complaint contains ambiguities or lacks necessary information to establish the truth and make the appropriate decision, the responsible person will investigate the complaint by requesting additional information from the involved parties or copies of documents in their possession that confirm or refute the facts described in the complaint.

All investigation findings will be documented in minutes signed by all parties involved in resolving the complaint.

12.4. Providing feedback

The complainant will be personally informed about the examination results through a letter, electronically, or by mail, depending on how the complaint was received or how the response was requested by the complainant. The response will be based on the investigation/examination materials and, if applicable, will contain references to national legislation and the World Bank's environmental and social standards,

proposing to the complainant actions to remedy the issues that formed the basis of the complaint, specifying the deadlines for implementation, and the complainant will then accept or reject them. If the complainant is not satisfied with the resolution, they will be informed about other options.

A written response to anonymous complaints will be possible if the complainant provides minimal data (e.g., an address to which the response should be provided), ensuring feedback. Notifications regarding anonymous grievances and responses to them may be:

- provided during the information and engagement activities according to World Bank ESS 10;
- placed on informational boards in respective institutions;
- posted on the institutions' websites;
- through social media channels.

The examination results and decision will be included in the Complaints Register. The response sent to the complainant will be kept in a special folder for strict document records under a complaint registration number.

The response to the complaint will include a request for the complainant/applicant to confirm the acceptability of the provided information and proposed solutions/actions within 5 days of receiving the response. If confirmation is not provided, tacit approval of the proposed solutions/actions in the response is considered.

12.5. Monitoring and evaluation

The monitoring of the implementation of the proposed solutions and actions will be carried out by the EQIP/subproject management teams according to the terms established/estimated for the implementation.

In order to monitor the complaint resolution process, the Complaint Tracking Register will be completed (Annex 4).

The feedback received from the stakeholders in the direct interaction events, such as workshops, round tables and survey will be included in the minutes or in the developed reports by institutions or contracted consultants. The results of all consultations / engagement activities will be submitted to the PMT.

The institutions can involve the contracted consultants for conducting the trainings, for curricula modernization and new programs development in the two-way communication with the teachers, students and labor market. These specific responsibilities can be considered during the Terms of Reference preparation, contract negotiation or to be agreed upon contract implementation.

XIII. GRM TO ADDRESS GBV OR VAC

13.1. Filing and registration of complaints regarding SA/SH and GBV cases

All employees, volunteers, consultants, and subcontractors of the project are encouraged to report suspected or actual cases of GBV or VAC. Leaders are required to report suspected or actual cases of GBV and/or VAC. For this purpose, the project will ensure the accessibility of available complaint channels with contact information for complainants. Levels and channels through which complaints can be registered safely and confidentially are presented in Section 12.1 of this GRM.

The focal point responsible for registering complaints regarding SA/SH and GBV cases from the implementing unit of the project will be trained to support survivors of GBV or VAC. Upon receiving the complaint, they will complete the Complaint Registration Form (Annex 2) in the Complaints Register and immediately inform the coordinator within the project implementing unit (as applicable): MEC/EQIP, ONDRL/EQIP, high school, kindergarten, economic agent/contractor. (Annex 3)

The project implementing unit coordinator will refer complaints related to GBV or VAC to GCCT for resolution, designate the person(s) responsible for addressing the complaint who are authorized to resolve issues related to GBV and VAC. It is extremely important to inform all designated individuals about the confidentiality of personal information of GBV/VAC survivors.

The focal point complaint registrar will send confirmation of receiving the complaint to the complainant and will inform the complainant of the estimated time frame in which a response can be expected. Note: This provision does not apply to anonymous complaints.

There is a very important that any information about a survivor’s story— even if anonymized—should only be shared if the survivor has given consent. Consent should be documented: survivors can choose to complete, sign, or fingerprint a consent form specifying their choices regarding sharing information about their cases with other agencies or individuals, including for what purposes. Consent must be mainstreamed throughout the mechanism through preestablished safe and ethical information-sharing protocols and systems for recording and storing information.

Obtaining the consent of children is different than obtaining the consent of adults. According to the SEA/SH Good Practice Note: “Children are considered unable to provide consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse” (World Bank 2020: 8). Special provisions are required for SEA/SH allegations that involve minors, especially given how vulnerable they are, including child-friendly feedback channels and specialized training for staff.

13.2. The process for dealing with VBG or VAC complaints

For complaints regarding gender-based violence, especially harassment, abuse, and sexual exploitation, there are risks of stigmatization, rejection, and retaliation against survivors. Therefore, the GRM will provide information about specialized services for assisting victims of violence. Additionally, women victims of violence will be informed about the opportunity at any time to call the Women's and Girls' Trust Phone for

those suffering from violence, victims of human trafficking, victims of sexual exploitation (it is free, confidential, operates 24/7) - 08008 8008.

For the examination and resolution of complaints regarding cases of GBV and VAC, a GBV and VAC compliance team will be established.

The GCCT will include, depending on the project, at least four representatives, as follows:

- a) E&S EQIP Specialists;
- b) health and Safety Manager from the Contractor's side or another person entrusted with the responsibility to address GBV and VAC issues who has the time and expertise to dedicate to this role;
- c) supervision Consultant;
- d) a representative of a local service provider experienced in the field of gender-based violence and VAC ("Service Provider").

According to the Action Plan, GCCT, through the service provider and the focal point(s), will investigate the complaint and ultimately provide the GRM operator with a solution to the complaint or to the police, if necessary. GBV and VAC compliance team members will undergo training from the local service provider before starting their mission to ensure they are sensitized to VBG and child protection.

GBV and VAC compliance team, with the support of EQIP and the contractor's management, will inform workers about GCCT activities and responsibilities during information sessions.

GBV and VAC compliance team will organize quarterly update meetings to discuss ways to strengthen resources and support provided to employees and community members regarding VBG and VAC.

In the process of resolving complaints regarding SA/SH and VBG cases, public or private social service providers, civil society organizations (CSOs) with experience in GBV/VBG will be involved. The list of GBV service providers is available at: www.stopviolenta.md<https://stopviolenta.md/index.php?do=feedback>

The service provider can be a local organization (possibly an NGO) that has the experience and capacity to provide training to staff and support survivors of GBV or VAC. The contractor(s) designated to address the complaint will contract the services of a service provider so that cases of GBV and VAC can be safely referred to them. The service provider will also provide support and guidance to GBV and VAC focal points and will be involved in addressing complaints related to GBV or VAC. The service provider will develop and conduct mandatory training for employees on GBV and VAC.

Survivors of GBV and VAC may need access to police, justice, health, psychosocial services, safe shelters, and livelihoods to begin healing from their experience of violence.

There is an institutional and normative system regarding accountability and referral actions to ensure the safety of schools and prevent VAC during the operational phase of the project-funded high schools. The key document of the educational system in the Republic of Moldova regarding GBV and VAC is the "Child Protection Policy in the Educational Institution. Implementation Guide" published on the Ministry of Education and Research website:

https://mecc.gov.md/sites/default/files/politica_de_protectie_a_copiluluighid_de_implementare.pdf

13.3. Providing feedback on GBV or VAC complaints

The complainants will be personally informed about the outcome of the complaint examination and the proposed solution. If the complainant is not satisfied with the proposed solution, they will be informed about other options.

The response and guidance/recommendations regarding complaints of this nature will be strictly transmitted to the contact details specified in the complaint, unless it was made anonymously.

A written response to an anonymous complaint will be possible if the complainant provides minimal data (e.g., an address where the response should be sent), ensuring the possibility of feedback. Notifications regarding anonymous grievances and responses to anonymous grievances may include:

- provided within the informational and engagement activities according to ESS 10 of the World Bank;
- posted on informative panels in the respective institutions;
- posted on the institutions' websites;
- through social media networks.

The response to disclosures of GBV and VAC provided to the complainant will be competent and confidential to increase awareness among the main stakeholders regarding GBV and VAC.

XIV. WORKER GRIEVANCE MECHANISM

The objective of this procedure is to resolve complaints between the employer and the employee or between employees bilaterally before the intervention of an official court, except in cases where the complaint constitutes a crime that requires reporting to law enforcement authorities.

The World Bank's labor provisions are presented in Environmental and Social Standard 2 on Labor and Working Conditions.

All contracts entered into under the project will include a Workers' Grievance Mechanism (WGM). At the time of hiring, workers and subcontractors will be informed about the WGM, which will include provisions ensuring the confidentiality of all complaints and stipulating that there will be no retaliation against workers who file a complaint.

The contractor will implement measures and channels to make the WGM easily accessible to all project workers, publicly display information about the project's WGM at the construction site and in other public areas of the workplace. Workers can also use Project GRM to file complaints as an option.

In civil works contracts for the project/subproject, three codes of conduct will be used as a minimum standard: the Company's Code of Conduct, the Manager's Code of Conduct, and the Individual Code of Conduct.

The Code of Conduct will highlight the positive behavior that workers must demonstrate. Through these Codes, contractors will prevent GBV/EAS/HS and maintain harmonious relationships with local

communities. This will be continuously reinforced through information sessions and training courses. These codes will be confirmed and agreed upon before work begins.

The Codes of Conduct will apply to all individuals employed by the contractor, including subcontractors and suppliers, at acceptable standards of behavior. The codes will provide sanctions for non-compliance, including for failure to adhere to specific policies related to gender-based violence, sexual exploitation, and sexual harassment (e.g., termination, or, in severe cases, criminal penalties).

The Code of Conduct will be signed by each worker at the time of hiring.

14.1. Filing and recording labor related complaints

For filing a complaint, the worker can use one of the channels available for complaints provided by the contractor: by email, phone calls, in writing to the postal address, in writing through a suggestion box, or verbally in person. For this purpose, the contractor will ensure the accessibility of all available channels with the provision of contact information for complainants. The confidentiality of all complaints will be maintained, and there will be no retaliation against workers who file a complaint.

The complaint registrar at the contractor's focal point will receive the complaint, complete the Complaint Registration Form (Annex 2) in the Complaints Register, and inform the contractor about the received complaint. (Annex 3)

The contractor will designate the person(s) responsible for resolving the complaint within two days of receiving the complaint.

The complaint registrar at the focal point will send confirmation of receipt of the complaint to the complainant within a maximum of five days from the date of receipt and inform the complainant of the estimated timeframe for a response. Note: this provision does not apply to anonymous complaints.

For complaints received by economic agents/contractors at the site level, whether verbally or by phone, it will not be necessary to confirm the receipt of the complaint. In such cases, the economic agent/contractor will focus directly on resolving the issue as soon as possible at the site level, informing the sub-project manager.

Verbal complaints made during meetings, public consultations, or other activities will be mentioned in the meeting minutes and subsequently recorded in the Complaints Register. The minutes will include the answer provided or the agreed timeframe and channels for answering.

14.2. The process for dealing with employment-related complaints

After appointing the person responsible for resolving the complaint, the involved parties will ensure the absence of conflicts of interest, that all individuals involved in the examination process have no personal, professional, or material interests regarding the outcome of the complaint examination, and they have no personal or professional connections with the petitioners or witnesses.

Verification and investigation of the case outlined in the complaint involve gathering information from the primary source about the complaint to determine its validity and to generate a clear picture of the circumstances surrounding the issue under consideration. This process typically includes site visits, gathering opinions from other stakeholders, analyzing documents, and meetings with individuals and/or entities that can assist in resolving the complaint.

After documenting the case, a meeting will be convened with the complainant GRM (if known and willing to be involved) to discuss aspects of the complaint that remained undisclosed during the documentation stage. The worker has the right to be accompanied by a colleague to the meeting in question.

In cases where it is not possible to clearly establish the divergences or the actions taken by the respondent or complainant, the responsible person will organize an informal meeting with the participation of both parties or their representatives to find an agreeable solution for both parties. If as a result of this informal meeting both parties have agreed to a solution, the responsible person will prepare the respective decision, which will be made available to both parties.

All investigation results will be recorded in a minutes of meeting signed by all parties involved in resolving the complaint.

14.3. Giving feedback

The complainant will be personally informed about the examination results via letter, electronically, or by mail, depending on how the complaint was received or how the response was requested by the complainant.

The response will be based on the investigation/examination materials and, if necessary, will contain references to national legislation and the World Bank's environmental and social standards. It will inform the complainant about the actions to remedy the issues that formed the basis of the complaint, specifying the deadlines for completion, and the complainant will either accept or reject them. If the complainant is not satisfied with the resolution, they will be informed about other options.

A written response to anonymous complaints will be possible if the complainant provides minimal data (e.g., an address to send the response), ensuring feedback. Notifications regarding anonymous grievances and responses to them can be:

- provided during information and engagement activities according to World Bank ESS 10;
- displayed on informative boards in the respective institutions;
- posted on the institutions' websites;
- through social media networks.

The examination results and decision will be included in the Complaints Registry. The response sent to the complainant will be kept in a special folder with strict document evidence under a complaint registration number.

The response to the complaint will include a request for the complainant/applicant to confirm the acceptability of the provided information and proposed solutions/actions within 5 days of receiving the

response. If confirmation is not provided, tacit approval of the proposed solutions and actions in the response is considered.

14.4. Monitoring and evaluation

Monitoring the implementation of proposed solutions and actions will be carried out by the contractor according to the established/estimated deadlines for completion. Contractors will approve streamlined procedures to address specific worker grievances, allowing workers to quickly report work-related issues such as unsatisfactory working conditions, lack of necessary work equipment, absence of appropriate procedures, or unreasonable overtime, and allow the project to respond and take necessary measures.

The Social Development Specialist and the Environmental Specialist from EQIP will also provide general support for implementation and capacity building to address all worker grievances. They will also include the status of worker grievances in the progress report.

XV. MONITORING AND REPORTING ON THE OPERATION OF THE GRM

Monitoring refers to the process of tracking complaints and assessing the extent to which progress is made in addressing them. EQIP is responsible for consolidating, monitoring, and reporting the total number of complaints and other types of claims/requests received and resolved.

Policies, procedures, and periodic updates regarding the GRM system, formulated and resolved complaints, will be made available to all stakeholders: published on the MEC and ONDRL websites in the EQIP section, media sources of institutions/organizations involved in project activities. These will be updated quarterly.

EQIP will monitor and keep records of complaints throughout the Project duration. Management teams of institutions/contractors will provide EQIP with weekly internal reports on the status of the GRM operation and a copy of the Complaints Registry.

The Social Development Specialist from MEC/EQIP will compile the information provided by sub-project management teams and will prepare quarterly reports for Project management and semi-annual reports to the World Bank.

Management teams of institutions/contractors will report monthly on the list of all received complaints and the status of complaint resolution as follows:

- GRM managers from schools and kindergartens in components 1 and 3 will report to the MEC/EQIP social issues specialist.
- GRM managers from high schools/kindergartens and contractors in component 2 will report to the ONDRL/EQIP social issues specialist who, in turn, will report to MEC/EQIP.

The report will contain information regarding:

- the complaint category;
- contact details of the Complainant;
- geographical location of the subject of the complaint;

- a brief description of the complaint, if applicable presentation of images, audio, and video recordings;
- description of the causes that led to the occurrence of the complaint;
- proposed solution for resolving the accepted complaint by the complainant or reasoning for rejecting the complaint.

These complaint reports will be based on complaint registries and the results of other consultation and engagement activities and will include a summary of information on the complaint status:

- number of complaints registered during the reporting period, by level (project or sub-project) and category and type;
 - number of complaints resolved, including responses to inquiries, requests for information, suggestions and proposals, and other feedback received through the GRM;
 - number of complaints examined;
 - number of complaints with accepted resolution;
 - number of complaints with partially accepted resolution;
 - number of complaints with unresolved/rejected resolution;
 - most frequent inquiries and requests/suggestions/proposals or feedback;
- actions and measures planned or taken based on the feedback received, such as, for example: development of informational materials on specific topics, additional information provided through social media channels and internal Viber or WhatsApp groups, mass emails, group meetings or workshops with a specific stakeholder group, etc.

EQIP will regularly monitor and track the complaint situation to ensure that all complaints are resolved within the established timeframe. EQIP will submit semi-annual reports to the World Bank team and all stakeholders, which will include the following information:

- the status of establishing the GRM (procedures, staff, public awareness/sensitization, etc.);
- quantitative data on the number of complaints registered and resolved, along with the resolution timeframe;
- qualitative data on the typology of complaints, the most common causes leading to complaints;
- any particular issues encountered in the operation of the GRM;
- the time required to resolve complaints;
- factors that may influence the functioning of the GRM;
- measures to reduce the number of complaints related to the project implementation process and to shorten the complaint resolution time.

EQIP will annually produce a report to the World Bank presenting the results of the SEP implementation, which will also include the GRM. This report will provide a summary of all public consultation issues, complaints, and resolutions within the project. The report will summarize the relevant findings from public consultations during community-level informal meetings. This report will be available online to the general public.

Stakeholders will be continually informed throughout the project implementation that the GRM is available and important. The GRM will be reviewed and updated based on proposals, comments, and suggestions

received from the Project's stakeholders, supplemented as necessary with project-specific arrangements, and distributed to the general public.

ANNEX 1. COMPLAINT SUBMISSION FORM*

No. registration: _____

Note: If you wish you can remain anonymous or request that your identity, not be revealed to third parties without your consent. In the case of anonymous complaints, the decision of the complaint will be made public online on the website of the MEC, ONDRL, beneficiary institutions, economic agents, etc.

First name _____

Surname _____

I prefer to express my complaint anonymously

I request that my identity not be revealed without my consent

contact information

Please mark how you would like to be contacted (phone, email).

by phone (note the number): _____

by e-mail (indicate) _____

I will follow the response from the website as I want to remain anonymous.

Preferred language of communication: Romanian Russian Other(*indicate*)

Town: _____

Place of deposit: _____

Description of the incident or complaint

What happened?

Where did it happen?

Who did it happen to?

What is the result of the problem?

Date of incident etc.

Signature: _____ Date: _____

Please send this form to: the address is indicated

* The submission form is an optional form that may be provided to the applicant for personal submission or may be available at information boards to submit complaints anonymously.

ANNEX 2. COMPLAINT REGISTRATION FORM

<i>Instructions: This form must be completed by the person receiving the complaint and kept in the project file. Attach any documents / letters, images presented.</i>	
Date of receipt of complaint:	Responsible person:
Complaint level (to be ticked <input checked="" type="checkbox"/>): <input type="checkbox"/> National <input type="checkbox"/> District <input type="checkbox"/> City/Village	
How to fill out the form (to tick <input checked="" type="checkbox"/>): <input type="checkbox"/> Personal <input type="checkbox"/> Phone <input type="checkbox"/> E-mail <input type="checkbox"/> SMS <input type="checkbox"/> Complaint collection box <input type="checkbox"/> Local meetings <input type="checkbox"/> Public consultation activities <input type="checkbox"/> Others (note) _____	
Complainant's Name: (information is optional and always treated as confidential) Gender of the Claimant: <input type="checkbox"/> Male <input type="checkbox"/> Female	
Complainant's address and contact details: (information is optional and always treated as confidential)	
City or place where the subject of the complaint occurred:	
Complaint subject/category:	
Brief description of the complaint (Provide as many details and arguments as possible)	
Category 1	Related to the overall implementation process of the Project or sub-project, including fairness in the implementation process, lack of information, transparency
Category 2	Gender-based violence and its impact or mitigation measures
Category 3	Relating to risks and working conditions, including health and safety, construction impacts, occupational accidents
Category 4	Related to misuse of funds/lack of transparency or other financial management concerns
Category 5	Related to developed curricula, programs and other related guides and documents under the Project
Category 6	Related to consultation and engagement process during the Project implementation
Category 7	Others
Who will be responsible for resolving the complaint (name and contact details):	
The period established for the resolution of the complaint and response to the complainant:	
Complaint resolution progress (eg: review, resolution, response to complainant, rejection):	

ANNEX 3. COMPLAINT RECEIPT FORM*

COMPLAINT RECEIPT FORM		
Complaint number:	Date sent:	
Name:		
Address and contact details		
Complaint received by:		
Complaint Name: Responsible:		
Complaint contact details responsive	Phone:	
	E-mail:	
	Approach:	

** to be used to confirm sent submitted complaints*

** does not apply to anonymous complaints*

ANNEX 4. COMPLAINT MONITORING REGISTER

SN	Details about the claimant									Resolution			Current Status
	Complaint received <i>(by the contractor / subproject management team)</i>	Submission method <i>(email, post, phone, inbox, in meetings, etc.)</i>	Category*	Type <i>(complaint, request, suggestion)</i>	Name/anonymous	Received Date – The date of the planned response	Description of the complaint	People responsible for addressing of the complaints	Contact method and contact details	Proposed action	Action taken	Responsible	
													under review – by contractor or subproject management team/requested EQIP support. response provided – proposed measures provided. closed – corrective action taken
001													
002													
003													
004													
005													
006													
007													
008													