

P-6 Grievance Redress Mechanism

Aim and Objective					
<p>P-6 Grievance Redress Mechanism (GRM) outlines the procedures for managing any grievances raised by Project stakeholders (including the community, workers, and others) in relation to Project activities. The GRM will be implemented through a coordinated effort of the PO, THL, HEC and Solomon Power. THL is responsible for implementing the GRM, as well as maintaining a Grievance Register capturing all grievances, and delegating the investigation and resolution of grievances to each of the Project partners as follows:</p> <ul style="list-style-type: none"> PO will be responsible for responding to issues related to livelihood restoration / asset-compensation, Community Benefit Share Pilot Project (CBSPP) programme processes/outcomes and land access. THL and HEC will be responsible for responding to the operations and construction-related grievances respectively. Solomon Power will be responsible for responding to transmission line-related grievances. <p>THL is also responsible for monitoring the progress of grievance redress and following up to ensure that the procedure described in this document is strictly adhered to. The THL Governance Lead will oversee all GRM and social safeguards implementation for TRHDP and be the main point of contact for these activities.</p>					
Summary of Impacts and Risks					
<p>The success of the Project is dependent upon the support of stakeholders at all levels, from the Solomon Island Government and project Concessional Finance Parties that finance the project, through to the workers that construct it, and the community who allow the project to operate in and around their homes and livelihoods.</p> <p>The GRM is one aspect of stakeholder feedback, but often comes after other forms of communication have been inadequate or unsatisfactory, or where existing environmental and social controls have fails. The GRM is designed to facilitate feedback from any Project participant or stakeholder regarding operations, management, use of resources and impacts of activities, intentionally or otherwise, and resolution of the grievance. It forms an integral part of the overall stakeholder engagement and communications strategy for the Project and should be read in conjunction with P-3 Stakeholder Engagement and Communications Plan.</p>					
Mitigation and Management Actions					
#	Issue or Risk	Action	Timing / Frequency	Responsibility	
P-6-1.	Disgruntled stakeholders disrupting the project	<ul style="list-style-type: none"> THL and HEC to take a proactive and inclusive approach to stakeholder engagement as per the P-3 Stakeholder Engagement and Communications Plan. This will help to keep stakeholders informed and can help to reduce disputes. All grievances will be handled discreetly and timely manner, with the aim to be resolved within 30 working days. Annex P-6-1 Grievance Management Procedure outlines the procedure and timelines for managing and monitoring grievances relating to Project activities. The PO will respond to grievances that relate to land access, compensation for lost assets and livelihoods, and restoration of impacted livelihoods and assets. For level 4 grievances requiring immediate/urgent response, the PO will manage the response and liaise with public services such as Police, medical services and NGOs as required. 	Throughout construction	THL E&S Manager HEC E&S Manager THL Governance Lead THL E&S Assistant (Social) PO CLO - Grievances	
Monitoring Requirements					
#	Title	Description	Target / Performance Indicator	Timing / Frequency	Responsibility
P-6-A.	Grievance Register	<ul style="list-style-type: none"> A Grievance Register maintained by THL will be the central point where all the grievances received by PO, THL, HEC and Solomon Power representatives are recorded and tracked. The THL E&S Assistant (Social) will work with relevant parties to ensure that the Grievance Register is kept up to date and will track all grievances against the timelines in Annex P-6-1 Grievance Management Procedure to ensure that grievances are being managed within the timeframes agreed. The Register will track: <ul style="list-style-type: none"> the complainant's name, age, gender, position / title and organisation if applicable contact details (address, telephone, email, website) date and nature of the grievance level of complaint (1, 2, 3 or 4) the responsible Project entity (PO, THL, HEC) and grievance owner how and when the Project has responded to the complainant including verbal and formal written acknowledgements, corrective actions, responsibilities final decisions on the complaint (rejection or resolution) communication on proposed and implemented resolution, due dates, achieved dates, close-out dates, etc a summary of the lessons learned from each grievance on close-out. HEC will provide a summary of all grievances received, ongoing and resolved, as part of their overall monthly and quarterly reporting to THL for the project. This shall include: <ul style="list-style-type: none"> Number and nature/topic of complaints Gender and age of complainants Level of complaint (1, 2, 3 or 4) Progress and resolution of complaints within or outside of target response times Number of resolved vs. outstanding grievances Number of complaints being resolved by legal, kastom, or other processes Any changes being implemented by HEC to address sources of complaints (e.g. consultation, safeguards, daily activities) 	Grievance Register maintained and up to date 100% of grievances resolved within 30 working days (unless diverted to legal, kastom or other dispute resolution processes)	All grievances reported in monthly HEC/THL project reports and HEC/THL quarterly E&S monitoring reports	THL E&S Manager THL Governance Lead THL E&S Assistant (Social)
P-6-B.	Weekly Project meetings	<ul style="list-style-type: none"> The following will be raised and discussed at the weekly Project meeting attended by THL, HEC and PO: <ul style="list-style-type: none"> Any new Level grievances received in the past week Any resolutions agreed upon within the past week Updates on the ongoing grievance process, including reporting back on timeframes (i.e. which stage the process is at, and whether response time targets are being met) 	100% of grievances resolved within 30 working days (unless diverted to legal, kastom or other dispute resolution processes)	Weekly	THL E&S Assistant (Social)

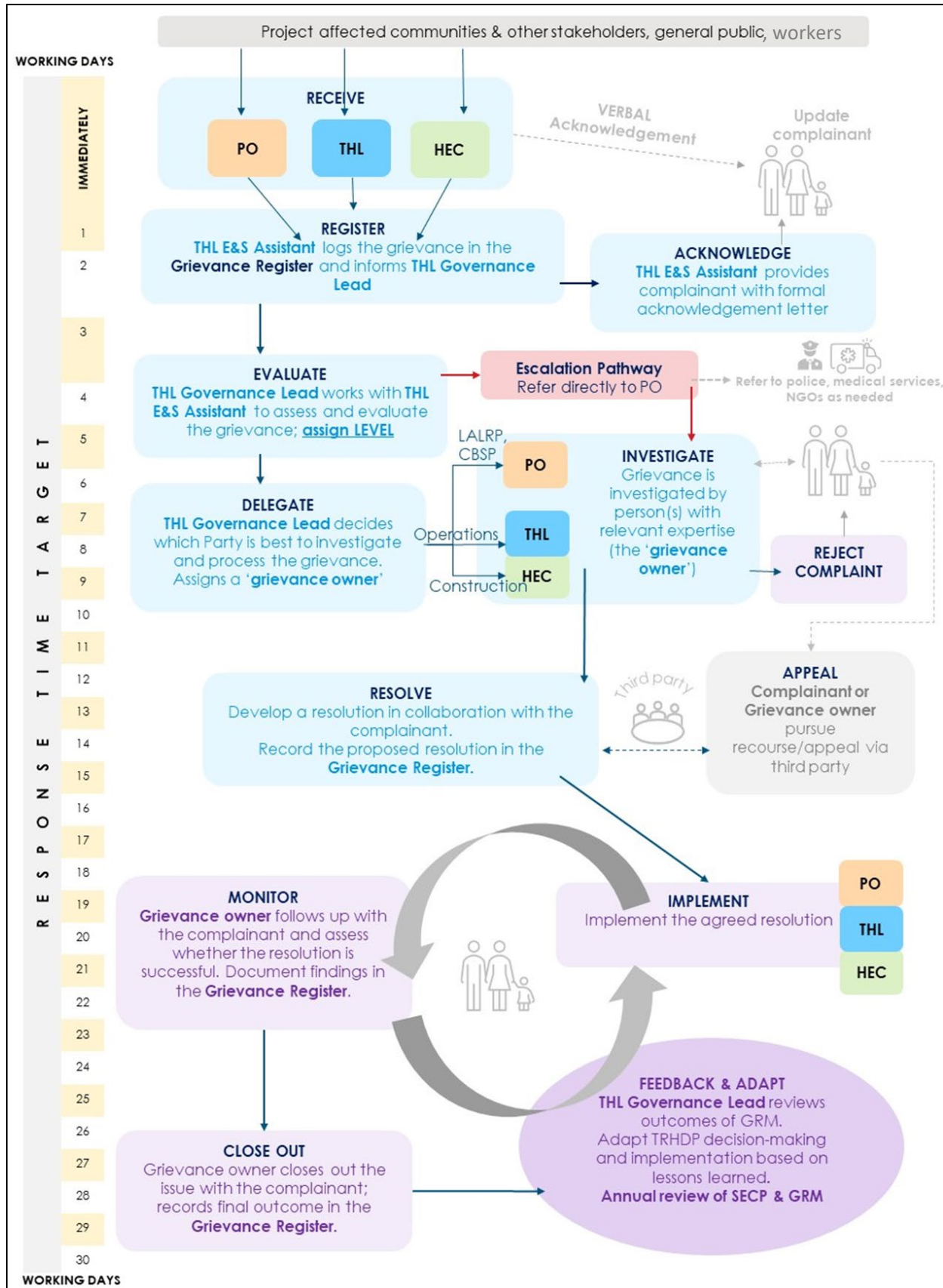
		– Support and agreement from managers on acceptable resolution actions and/or approaches to investigations or any other aspect of the GRM process			
P-6-C.	Monthly grievance meeting	<ul style="list-style-type: none"> The THL Governance Lead will host a monthly meeting, where representatives from THL, HEC, PO and Solomon Power are invited. Participants will revise and discuss the Grievance Register, outstanding grievances, lessons learned, and assess the overall performance of the GRM. Following this meeting, and with the agreement of all present at the meeting, responsible project entities shall follow up and resolve any outstanding grievances, and address any project-related actions (or inaction) driving the grievances. 	100% of grievances resolved within 30 working days (unless diverted to legal, kastom or other dispute resolution processes)	Monthly	THL Governance Lead THL E&S Assistant (Social)
P-6-D.	Six-monthly E&S audits	<ul style="list-style-type: none"> OE shall review GRM documentation for compliance with the E&S safeguards requirements and Good International Industry Practice (GIIP). This includes compliance with the procedures and timelines specified in Annex P-6-I Grievance Management Procedure. 	Full compliance with Project Safeguards requirements	Every 6 months as part of OE E&S audit	OE E&S Safeguards Lead
P-6-E.	Annual GRM reviews	<ul style="list-style-type: none"> An annual review of the GRM will be conducted by the THL Governance Lead, and with advice from the OE where needed. Suggested criteria and questions to be covered in the evaluation are outlined in Annex P-6-VI Evaluation of the GRM. 	Full compliance with Project Safeguards requirements	Annually during construction, by 31 December each year	THL Governance Lead

Supporting Documents		
Annex	Name	Description
P-6-I.	Grievance Management Procedure	Diagram showing the Project's procedure for managing and monitoring grievances related to Project activities.
P-6-II.	Complaint Form	Hard copy form used to lodge a grievance in Step 1
P-6-III.	Key Roles for GRM within the Project	Diagram showing the key roles within the GRM and their interactions
P-6-IV.	Templates for Grievance Acknowledgement Letter	Provides a template for letter acknowledging receipt of a grievance
P-6-V.	Grievance Close Out Form	Hard copy form used to close out a grievance in Step 8
P-6-VI.	Evaluation of the GRM	Criteria and questions for evaluation of the regular GRM

ANNEX P-6-I GRIEVANCE MANAGEMENT PROCEDURE

GRIEVANCE MANAGEMENT PROCEDURE

The figure below summarises the Project's procedure for managing and monitoring grievances.



Detailed description of the GRM Procedure

Step	Description / Actions	Timing (wk days)
<p>Step 1 – receive a grievance</p>	<p>There are a number of ways that grievances may be communicated to the project. These include:</p> <ul style="list-style-type: none"> • Ad-hoc, verbal communication with any employee of the Project, including staff from PO, HEC, subcontractors, THL and OE. This could occur in person or via phone call. • Verbal communication with Project employees, including Community Liaison Officers (CLOs), during planned engagement activities. • Verbal communication through the Project information hotline, administered by PO. (Note: all verbal grievances received will be transcribed by the recipient onto an official complaint form as soon as possible). • Written communication via an online form on the Tina Hydro website (administered by PO). • Community complaints or protests (verbal and non-verbal), including signs or road blocks. • Written communication by emailing the Project email address or posting a hard copy of the complaint form (Annex P-6-II Complaint Form) provided by the PO, THL and HEC. The form will be available at designated venues identified in consultation with local communities, along with each of the Project organisations’ offices in Honiara (PO, THL and HEC). Complainants will be able to submit the complaint forms to the PO, THL and HEC via secured drop boxes outside each office, or drop them in the secure drop boxes available at public places in the Project area (once these locations are agreed with local communities). Complainants will also be able to mail the completed form to THL. <p>Following the receipt of a grievance:</p> <ul style="list-style-type: none"> • Reporting to the THL E&S Assistant (Social) must take place within <u>two working days</u> of receipt of a verbal or written grievance. • If the recipient is a worker with no direct responsibility for grievance management (e.g. subcontractor, HEC labourer – any role not mentioned directly in Annex P-6-III) they will report the grievance to their supervisor, who will then inform the THL E&S Assistant (Social). • If a person with a direct responsibility for grievance management (i.e. mentioned directly in Annex P-6-III) receives a grievance, they will report it directly to the THL E&S Assistant (Social). • The THL E&S Assistant (Social) will enter the grievance details onto the online shared Grievance Register and inform the THL Governance Lead that the grievance has been received and logged. The grievance will be assigned a unique grievance number for ease of tracking. <p>*Grievances that involve significant issues and clearly need immediate attention (i.e. likely to be Level 4, according to criteria in Step 3 below) will be communicated directly to the THL Governance Lead and the PO E&S Safeguards Manager at the same time. The PO will manage the response and liaise with public services such as Police, medical services and NGOs as required. Emergency response protocols will also be followed (as per P-8 Workers Health and Safety Plan).</p>	<p>Day 0-2</p>

<p>Step 2 – acknowledge the grievance</p>	<p>All grievances received will be acknowledged. The recipient and/or the THL E&S Assistant will provide the complainant with a verbal acknowledgement of the receipt of the complaint as soon as it is received (within the same business day). This verbal acknowledgement will be noted in the Grievance Register.</p> <p>A formal written acknowledgment (a letter, using the template provided in Annex P-6-IV) will be sent to the complainant within <u>four working days</u> of receipt, depending on the complainant’s preferred method of contact. The acknowledgement will include the grievance number for tracking purposes. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.</p> <p>Stakeholders will have the option to lodge an anonymous grievance. These will be logged and reported anonymously with other complaints for action and to facilitate continuous improvement. It is important to let the complainant know that it may be difficult to provide them with full investigation or feedback on anonymous complaints (this will also be stated on complaint forms, as per Annex P-6-II). However, such grievances shall still be fully investigated.</p>	<p>Day 3-4</p>
<p>Step 3 – Evaluate the Grievance</p>	<p>The THL Governance Lead will work to understand the details of the grievance and make an assessment to assign a Level, which will represent the significance and nature of the grievance.</p> <p>Procedure for evaluating a grievance:</p> <ul style="list-style-type: none"> • The THL Governance Lead will review grievance details and assign the grievance a Level, using the criteria shown in the Table below. • The THL Governance Lead will decide which of the Project organisations would be most appropriate to process the grievance (THL, HEC or PO), and discuss this decision with the THL E&S Assistant (Social). The THL Governance Lead may decide the grievance falls outside the scope of this GRM. If it is related to land acquisition and livelihoods it will be addressed through the LARAP process managed by the PO; if it is related to the transmission line it will be addressed through Solomon Power’s own GRM. • The grievance owner must be processed by someone who is knowledgeable in the topic of the complaint, can analyse the complaint, solicit the input of any additional staff members or outside parties or experts as necessary, and make decisions as to how to investigate and resolve the issue. The key contact within the chosen organisation will become the grievance owner, i.e.: <ul style="list-style-type: none"> – Grievances assigned to PO will be owned by the PO CLO - Grievances – Grievances assigned to THL will be owned by the THL E&S Assistant (Social) – Grievances assigned to HEC will be owned by the HEC E&S Supervisor • Grievance owners may choose to delegate further to a member of their own team (such as a CLO) but will remain ultimately responsible for the investigation, resolution and closing out the grievance. • The THL E&S Assistant (Social) will enter the decisions made regarding the grievance owner and assigned Level into the Grievance Register, and initiate contact with the chosen ‘grievance owner’ to begin the investigation. • The evaluation process (assignment of a Level and delegation to a grievance owner) will take no more than <u>two working days</u>. No judgment on the validity or relevance of the grievance will be made until an investigation is completed. • If a grievance is ‘rejected’, the THL E&S Assistant (Social) will send written notice of the decision to the complainant within <u>three working days</u> of the decision, and provide a detailed reason for the rejection. This will be logged in the Grievance Register. 	<p>Day 5-7</p>

Level	Types of grievance	Examples
1	Relatively minor and one- time problems related to construction/project operations	<ul style="list-style-type: none"> • Company equipment causes damage to an individual’s livestock • One-time disagreement with a subcontractor over working conditions
	Relatively minor but repetitive problems related to construction/project operations	<ul style="list-style-type: none"> • Noise and dust complaints during the construction phase, brought up by a group of people or repetitively raised by individual complainants • Visible changes in river water quality (e.g. caused by increased runoff of sediment-laden water from active construction sites) which persist, and are raised repeatedly as an issue by complainants • Damage to food gardens/trees over time • Project traffic continuously blocks the local access roads
2	Significant, larger and/or repeated problems related to construction/project operations	<ul style="list-style-type: none"> • During construction, company uses some land beyond the initial agreement with a community for temporary land use • Misconduct of in-migrant workers (do not pay for local services, such as hotels, restaurants, shops; damage crops) • Damage to tambu or other culturally significant sites
3	Major claim, significant adverse impact on a larger group or several groups	<ul style="list-style-type: none"> • Employment opportunities do not meet expectation of local communities • Significant water contamination (less fishing, unclean water, and so on), water shortage • Violence against women / any other violence relating to the Project workforce or communities • Illegal activity
	Major allegations regarding policy or procedure	<ul style="list-style-type: none"> • Allegations of systematically inadequate land compensation • Communities not provided with disclosure of project information and fear, uncertainty, or rumours lead to civil unrest
4	Immediate, urgent action required – potential severe impact Follow escalation pathway	<ul style="list-style-type: none"> • Highly visible/public event – damage with high potential for severe consequences, immediate social and environmental, health and safety impacts. E.g. UXO chance find, fatality/serious injury, threat to community • Flooding/uncontrolled release relating to dam construction or operation (e.g. visible slug of sediment or other contamination downstream; threat to property and people) • Public demonstration – e.g. violent protest, rioting associated with Project/within project area

<p>Step 4 – Investigate the Grievance</p>	<ul style="list-style-type: none"> • The grievance owner will investigate the complaint, with a target of completing the investigation within <u>12 working days</u> from when it was received. • The grievance owner can investigate and initiate resolution for Level 1 complaints independently (without needing to involve other Project teams) where potential impacts and consequences are relatively low (e.g. speed limits). They will keep the THL E&S Assistant (Social) informed of progress and approach. • For level 2, 3 and 4 complaints, particularly where the complaint may have significant implications to the business image or performance, a Grievance Committee will be established wherein the THL Governance Lead will work with the relevant grievance owner to investigate and resolve the grievance, and involve other parties as required (namely PO and wider Project management staff) as well as community members, including male and female members, as necessary. • For level 3 complaints involving workers and illegal / criminal activity, workers found to be engaging in criminal behaviour will be instantly dismissed and reported to the authorities (refer P-9 Workers Code of Conduct). • Once an investigation is complete, if the grievance is to be 'rejected', the THL E&S Assistant (Social) will send written notice of the decision to the complainant within <u>three working days</u> of this decision and provide a detailed reason for the rejection. 	<p>Day 8-12</p>
<p>Step 5 – Develop a resolution</p>	<p>Standard resolution process:</p> <ul style="list-style-type: none"> • A resolution will be developed in consultation with the complainant, and other Project staff with grievance management responsibilities, as necessary, as soon as possible but no later than <u>20 working days</u> after receiving the grievance. Level 3 and 4 complaints will be prioritised and should have resolutions identified within seven working days. • The development of a resolution will take into consideration the accepted and/or traditional resolution processes in the local communities. • Grievance owners (or their assistants or CLOs) will ask complainant(s) for written acceptance of the resolution (or verbal if the complainant has difficult reading/ writing, in which case the Project team member will record the acceptance on behalf of the complainant, with their verbal permission). • If the complainant does not accept the proposed solution the following steps will be taken: <ul style="list-style-type: none"> – The grievance owner and other Project representatives, as required, will meet with the complainant and look for new or additional corrective actions. – Where a solution is not achieved a meeting will be convened within one calendar week (seven consecutive days) of the complainant's rejection of a resolution, to be attended by (at minimum): <ul style="list-style-type: none"> ○ PO E&S Safeguards Manager and either the PO CLO - Grievances, OR another CLO (as appropriate) ○ THL CFO and THL Governance Lead ○ THL E&S Assistant (Social) – to take written record (minutes) of the meeting and distribute to all attendees following the meeting ○ HEC Project Manager and HEC E&S Supervisor ○ Grievance owner 	<p>Day 12-20</p>

	<ul style="list-style-type: none"> – If the grievance is still not resolved during the meeting described above, the complainant will be informed of their rights to have their grievance referred to the relevant government authority, including the courts, if they are not satisfied with the outcome of the grievance process. For land ownership, access and livelihoods-related issues, the judicial processes and available options for legal assistance are described further in the LALRP for the project. Consultative methods are preferred over legal methods of resolution. <p>Resolving via kastom processes</p> <ul style="list-style-type: none"> • It is anticipated that some grievances could be dealt with via kastom processes. In particular, any grievances relating to land and asset ownership precipitated by the Project should be dealt with as appropriate via the traditional kastom system. • This system involves knowledgeable tribal elders and chiefs within the community affected by the grievance undertaking an investigation, consulting with the parties, and arbitrating for a resolution. This process is also described in the LALRP. • The kastom system would be utilised at the initial discretion of the THL Governance Lead (with input from the THL E&S Assistant (Social) and in consultation with PO and HEC). • Where a grievance relates to the PO’s management of the resettlement action plan (described in the LALRP), kastom resolution is not appropriate. • For any other dispute dealt with by kastom processes, the THL E&S Assistant (Social) and/or the Grievance Owner will recommend this approach to the THL Governance Lead, who is required to make the decision that kastom processes are to be used to review and deal with any complaint. The THL Governance Lead has sole responsibility to ensure the kastom process is followed through and that all parties are satisfied this is the appropriate approach. • The same timeframe shall be followed for resolution via kastom processes as standard grievances, unless otherwise agreed with the complainant. 	
<p>Step 6 – Implement the resolution</p>	<ul style="list-style-type: none"> • Once the resolution is accepted by the complainant, the solution will be implemented. • Where required, corrective actions will be put in place as part of the resolution process. For actions assigned to HEC, the representative will work with the THL E&S Assistant to implement corrective actions as required. • For relatively simple, short-term actions that can resolve the problem, the objective will be for the solution to be implemented within 14 days after assessing the grievance. For solutions that take longer to address, or for which the complainants are not satisfied or additional corrective actions are required, the complainants will be informed of the progress until the solution is completely implemented. 	<p>Day 21 onward</p>
<p>Step 7 – Monitor Implementation</p>	<ul style="list-style-type: none"> • The grievance owner will inform the complainant that the corrective actions have been implemented and confirm that the complainant is satisfied with the resolution. • Where a complainant is not satisfied the grievance owner will organise a meeting with the relevant Project representatives to discuss further corrective actions. • The effectiveness of implemented solutions will be monitored either as part of this GRM and/or via other ESMPs as relevant. 	<p>Day 21 onward</p>

<p>Step 8 – Closeout and document final outcomes</p>	<ul style="list-style-type: none"> • The grievance will be closed out by the grievance owner using Annex P-6-V Grievance Close Out Form. • If further attention is required for construction related grievances the THL E&S Assistant (Social), in discussion with the original grievance owner, will return to Step 3 to re-evaluate the grievance. • All correspondence related to the grievance will be documented in the Grievance Register for monitoring, reporting and learning. This will help drive adaptive management and continual improvement. 	<p>Day 21-30</p>
<p>Step 9 – Feedback and Capture Lessons Learned</p>	<ul style="list-style-type: none"> • The Project will disclose information about the outcomes from implementation of the GRM, including the volume and nature of complaints, and performance against response time targets—as well as key conclusions from the monitoring and evaluation process outlined for Step 7. This will include: <ul style="list-style-type: none"> – an overview of the types of grievances raised (e.g. dust, traffic, noise), disaggregated by gender and location – the frequency at which the grievances are raised to understand the impact and importance (and to highlight common / recurring themes) – percentage of grievances that have been successfully resolved or are still being managed, both within and outside of the response time targets. • THL will provide regular feedback to the community to clarify expectations about what the GRM does and does not do, to encourage people to use it, and to gather feedback to improve the grievance mechanism. THL will report back to the PAPs and other stakeholders about: <ul style="list-style-type: none"> – how the GRM has affected the policies, procedures, and operations of the Project parties, including what the project is learning and how the project has changed actions and procedures in response – how to make the GRM more effective. • This information will be delivered in accordance with P-3 SECP and in collaboration with all parties including HEC and PO (and particularly the PO Communications Team). 	<p>Ongoing</p>

USE AND STORAGE OF SENSITIVE INFORMATION

Information collected in relation to grievances can contain the personal details of the complainants, and sensitive material. As such, the utmost care must be taken to maintain confidentiality and protect this sensitive information as follows:

- All grievances are dealt with confidentially, following the process describe in this document.
- All complainants are informed about how their complaint is handled confidentially and how their information is secured and stored.
- The Grievance Register and any related documentation (including signed forms, photographs, written statements, and other supporting evidence) shall be kept in a secure online 'cloud'-based facility (e.g. Sharepoint or Google Drive).
- Access to the Register will be restricted to Project management and individuals named in Annex P-6-III only, along with oversight roles with contractual responsibilities to the project (e.g. OE Environmental & Social Safeguards Lead) so that they can perform audits efficiently and maintain regular oversight of the GRM process. Anyone with access must have a dedicated login profile (password protected) and must not share their login details with anyone else.
- Offline copies of the Grievance Register, parts of the register or any completed forms will not be generated, printed or shared at any time.
- At no time will any of the information contained in the Grievance Register, or any other information pertaining to grievances, be shared publicly or with third parties which are not contractual partners in the Project.
- Reporting of GRM performance (in reports which are likely to become public, such as the Quarterly Safeguards Report produced by THL for PO and Lenders) will be anonymised – all names and contact details, and any other identifying information, are to be removed from reported data. Results will be reported in aggregate (i.e. not referring to any individual grievances or complainants).

As described in P-3 SECP, there is currently no specific legislation in the Solomon Islands that regulates and provides guidelines for the collection, storage and use of sensitive data from individuals. If an appropriate standard becomes available during the Project, this will be applied (and this GRM updated to reflect the requirements). In the meantime, Good International Industry Practice principles will be applied.

COMPLAINT PROCEDURE FOR SEXUAL HARASSMENT, ABUSE AND EXPLOITATION GRIEVANCES

As per P-9 Workers Code of Conduct, workers engaging in criminal behaviour (such as sexual assault/harassment, assault, threat of assault, violence, theft, consuming illicit substances, etc) will be instantly dismissed and reported to the authorities.

The following process relating to harassment, abuse and exploitation grievances between local people and workers and/or workers and workers will be actioned through the GRM.

1. A person who is subject to sexual harassment, abuse or exploitation will, if appropriate and safe to do so, inform the alleged harasser that the conduct is unwanted and unwelcome.
2. The victim/survivor will immediately report the incident to a designated person such as Project doctor/Gender Focal Point.
3. When a designated person receives a complaint of sexual harassment, abuse or exploitation he/she will:
 - immediately record the dates, times and facts of the incident(s)
 - ascertain with the victim/survivor that all information will be kept confidential and to understand their views as to what outcome they want
 - ensure that the victim/survivor understands the Project GRM's procedures for dealing with the complaint
 - discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim/survivor from pursuing a formal complaint if he/she is not satisfied with the outcome
 - keep a confidential record of all discussions, including the victim/survivor personal details
 - respect the choice of the victim/survivor
 - support the victim/survivor to lodge the complaint outside of the Project GRM and the Company through the relevant legal framework (including Police)
4. Investigations on grievance associated with violence against women need to be gender-responsive, taking into account gender norms, gender inequalities and the situations of vulnerability and risks faced by women at work. Therefore, a specialist third party (trained in gender-based violence issues) may be assigned to support these complaints procedures.
5. If the victim/survivor wishes to deal with the matter informally, the designated person dealing with the grievance will:
 - give an opportunity to the alleged perpetrator to respond to the complaint
 - ensure that the alleged perpetrator understands the complaints mechanism
 - facilitate discussion between both parties to achieve an informal resolution, which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
 - ensure that a confidential record is kept of the outcomes
 - follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
 - ensure that the above is completed within seven days of the complaint being made.
6. If the victim/survivor wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim/survivor, with an agreement/consent from the victim/survivor, a formal complaint mechanism may be used to resolve the matter. The responsible person carrying out the investigation will:
 - interview the victim/survivor and the alleged harasser separately

- interview other relevant third parties separately
 - make a judgement regarding whether or not the incident(s) of sexual harassment took place
 - produce a report detailing the investigations, findings and any recommendations
 - in the case that the harassment took place, decide what the appropriate remedy for the victim/survivor is, in consultation with the survivor, which may include, but not be limited to the following:
 - an apology
 - a change to working arrangements
 - a promotion if the victim/survivor was demoted as a result of the harassment
 - additional training/monitoring for the perpetrator
 - disciplinary action, including potential suspension or dismissal
 - raising of a grievance under the GRM
 - referring to the Police.
 - follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the survivor is satisfied with the outcome
 - keep a record of all actions taken
 - ensure that all records concerning the matter are kept confidential and that the process is completed within seven days of the complaint being made.
7. Throughout and at the conclusion of the investigation (and regardless of the outcome), the Project has a duty to create a safe environment for workers and the community. This shall include:
- Providing support and tools to alleged victims/survivors so that they feel safe;
 - Directly addressing, and where possible, removing or preventing, the environment within which the alleged incident took place; and
 - creating a positive work environment so people feel supported and safe to come forward with complaints

Resources for victims/survivors of gender-based violence

- The Project doctor (a qualified and registered general practitioner) will be designated to receive complaints about harassment (including sexual harassment). The Project doctor will have sufficient experience and knowledge of appropriate protocols for investigating claims of sexual or physical harassment and abuse.
- The Project doctor will liaise with and seek additional support from local Gender-Based Violence service providers or specialist third party as required, and with the consent of the victim/survivor. At this stage, there are four third party specialists in the area, including:
 - Royal Solomon Islands Police Force Seif Ples. This is a Crisis and Referral Centre offering first response services for victims-survivors of sexual and gender-based violence. Toll Free: 132, Phone: 677 24677. Victims can be moved into the Seif Ples for safety by the RSIPF.
 - Anglican Church of Melanesia Christian Care Centre. Women and children are accommodated at the care centre for safety and pastoral care.
 - Family Support Centre. Phone : 26999.
 - Christian Care Centre. Phone: 22801.

Female nurses will also be available as an alternative point of contact, at the medical facility within HEC's temporary site office.

GRIEVANCES RELATING TO CONDITIONS WITHIN THE WORKER ACCOMMODATION CAMP

Augmentation of the GRM in relation to grievances from Camp occupants will be as follows:

1. Categorisation will be undertaken once a grievance is lodged, and utilise three basic categories for which appropriate value judgements will be important:
 - **Minor Grievances:** such as poor housekeeping, lack of maintenance of recreation facilities, poor responsiveness of camp management to minor matters and disagreements with other camp occupants of a non-material nature.
 - **Significant Grievances:** related to concerns that can reduce the long-term physical or mental health of camp occupants. This includes reduced food quality, lack of clean water, removal of recreation facilities or intimidatory behaviour.
 - **Major Grievance:** related to a matter that places the immediate well-being of camp occupants and workers at risk. This includes matters such as exposed electrical wiring, immediate threats of violence, illegal activity within the camp, any condition that influences the capacity of the camp to fully function (e.g. medical facility closes), and any situation that may be classed as forced labour (e.g. identity documents being withheld).
2. Secured drop boxes for the lodging of written grievances will be provided within the camp. However, they will be placed in discreet locations, away from major thoroughfares and high-use rooms (e.g. dining hall), and will not be in view of any security cameras.
3. The parties involved in addressing grievances will generally be HEC and the appointed camp services contractor. HEC will be responsible for the implementation of the GRM as it relates to matters within the camp and relating to camp occupants. However, should an individual (or group) who lodges the grievances be unsatisfied with the outcome of the investigation, they will have the right to escalate to THL and the PO for further evaluation. This is excepting matters of a legal nature, which will be referred to the relevant authority within the SIG.

HEC will actively support the establishment of a consultative committee where requested by the camp occupants, and not seek to influence its make-up or constitution. This committee may have a wide recourse (including organisation of activities and entertainment) and act as a bridge between the camp residents and HEC/Camp Management. This consultative committee can also act to receive grievances and escalate them through the grievance resolution process. Additionally, where such a committee has been formed, it shall be involved in Step 4 (Investigate the Grievance), Step 5 (Develop a Resolution), Step 6 (Implement the Resolution) and Step 7 (Monitor Implementation) of GRM implementation.

ANNEX P-6-II COMPLAINT FORM

ANNEX P-6-II COMPLAINT FORM

Complaint Form (English)					
PART 1 – Contact Details					
Complaint number (assigned by Project staff):					
Date:					
Recorded by:					
Complainant details:					
Name: _____ (or write 'None' if you wish to remain anonymous and do not wish to be contacted further)					
Gender (please circle one): Female / Male / Other / I prefer not to answer					
Age:					
Category (please circle one, or provide details for 'Other' below):					
Registered for TRHDP Community Benefit Share Pilot Project	Community leader	Politician or public servant	Member of NGO or community group (e.g. charity, church, recreational club)	Local resident	OTHER (please detail below)
Details if 'OTHER' category:					
Telephone number:					
Address:					
Preferred method of contact:					
<i>Please note:</i>					
<i>Information regarding ALL complaints received will only be recorded for the purposes of tracking and resolving complaints, and reporting on performance for the Tina River Hydropower Development Project.</i>					
<i>Individual names and contact information will never be made public. All information will be stored in a secure digital location with access restricted to TRHDP management personnel only.</i>					
<i>If you choose to remain anonymous, please understand that TRHDP staff will still follow up your complaint but may not be able to provide you with updates on how your complaint has been addressed.</i>					
PART 2 - Description of grievance					

Preferred method of communication (written/ verbal/ phone message/ meeting/ mediator):

Date grievance received:

Date of acknowledgement:

Acknowledged by:

Signatures

Recorder (name, organisation and title):

Claimant:

ANNEX P-6-III KEY ROLES FOR GRM WITHIN THE PROJECT

ANNEX P-6-IV TEMPLATES FOR GRIEVANCE ACKNOWLEDGEMENT LETTER

ANNEX P-6-IV – TEMPLATES FOR GRIEVANCE ACKNOWLEDGEMENT LETTERS

English Version

[THL's contact information here – E&S Assistant (Social) as contact person]

[Date]

[Complainant's name or the name of the organization submitting the complaint if the complainant wishes to remain anonymous]

[Complainant's address or "No physical address"]

Submitted _____ *[in person or by mail/e-mail/telephone]*

Dear Mr./Mrs./Ms. *[family name of complainant]*:

Re: Complaint regarding *[describe complaint briefly]*

Tina Hydropower Limited acknowledges that we received your complaint dated _____ *[date]*. Our company takes community concerns seriously, and we thank you for submitting your complaint. We will make every effort to ensure that your complaint is considered quickly and fairly.

The Tina River Hydropower Development Project (TRHDP) has a grievance mechanism process that we follow to consider and resolve complaints. Attached is a description of the process, so you can learn more about it. In accordance with our grievance mechanism procedures, we will determine whether your complaint is eligible for consideration via the Project's grievance resolution process and consider next steps, as relevant. We will contact you during this period should we need more information.

You can expect to hear from us within five (5) business days from the date of this letter.

Please refer to the attached grievance mechanism procedures for more information on what you can expect as we address your complaint, including timeframes, responsibilities, and your rights throughout the process.

Sincerely,

[Name of senior-level management representative]

[Title]

[Name of your company/organization]

Enclosure: *[Factsheet on grievance mechanism process, to be developed in coordination with PO, as same content will go on Tina Hydro website]*

Solomon Islands Pijin Version

[THL's contact information here – E&S Assistant (Social) as contact person]

[Date]

[Complainant's name or the name of the organization submitting the complaint if the complainant wishes to remain anonymous]

[Complainant's address or "No physical address"]

Submitted _____ [in person or by mail / e-mail / telephone]

Dear Mr./ Mrs./ Ms. [family name of complainant]:

Re: Komplon folom [describe complaint briefly]

Tina Hydropower Limited laek tok save noma dat mifala tekem an lukim nao disfala komplon leta bilong iu lo disfala dei an manis [date].

Kabani bilong mifala luk biki tumas lo olketa wari bilong oloketa vilij pipol bilong iumi so mifala laek tok tenk iu fastaem fo disfala leta bilong iu. Bae mifala trae an mek sua dat mifala luk save an waka kwik taem lo leta bilong iu.

Tina River Hydropower Development Project (TRHDP) garem wanfala sistem , wea mifala mas waka folom taem mifala trae fo stretim olketa komplon olsem. Disfala sistem bilong mifala hem kam weitim disfala leta fo iu save lukluk folom.

Weitim disfala sistem bilong mifala , miafala mas luk fastaem if disfala komplon bilong iu hem wanfala samtig wea mifala bae garem pawa fo stretim. If hem samtig wea mifala save stretim den bae mifala stat fo waka lo hem..an bae mifala save kam fo askem iu samfala stori moa folom komplon bilong iu.

Bae mifala stori kam lo iu afta 5 fala deis lo waka.

Plis lukluk folom komplon sistem bilong mifala wea mifala putim kam weitim disfala leta. Diswan hem fo iu save gud moa an folom sistem ia, wea mifala save folom taem mifala waka weitim komplon bilong olketa pipol. Hem gud fo iu save tu hao iu save waka gud weitim mifala taem iumi waka lo komplon bilong iu.

Tenkiu tumas,

[Name of senior-level management representative]

[Title]

[Name of your company/organization]

ANNEX P-6-V GRIEVANCE CLOSE OUT FORM

ANNEX P-6-V GRIEVANCE CLOSE OUT FORM

<p style="text-align: center;">Grievance Close Out PART 3 - Resolution</p>
<p>Describe the steps taken to resolve the grievance and the outcome:</p>
<p>Department: Mode of communication for reply (meeting/ written/ verbal/display): Date closed:</p>
<p>Signatures</p>
<p>Complainant: Project representative: Date:</p>

ANNEX P-6-VI EVALUATION OF GRM

EVALUATION OF THE GRM

Evaluation questions will be developed in two broad areas: the performance of the GRM, and lessons related to the Project that have emerged.

Performance of the GRM

Questions targeted to the GRM's performance

- How well is the system accomplishing its purpose and goals?
- Do PAPs consider the process is fair and effective?
- Is the system reducing project risks? How?
- Does the mechanism enable complainants to raise their concerns, engage in a fair process, and obtain a satisfactory settlement to their issues (when appropriate)?
- Are complaints heard and resolved within a reasonable timeframe?
- Where are the gaps? What is and is not working?
- Do people know where to go? Is the mechanism accessible and easily understood?
- Do those who receive and register complaints document the complaints?
- Can complainants readily determine the status of their complaint and how the company is responding?
- How well is the system used by a wide cross-section of men, women, and youth from the community?
- Has the number of grievances received from females (and their participation in GRM processes) increased over time, remained consistent, or decreased (since project inception)?
- How well does the mechanism address the power imbalance between the project organisations and the complainant and assure that the complainant is not always merely receiving a judgment from the Project organisations?
- Does the mechanism provide adequate opportunities for face-to-face participation and discussion and joint development of mutually acceptable solutions to issues in question?
- What conflict trends, community issues, and project operations could influence the kinds of conflicts that might be expected in the future?
- Is the GRM able to handle future issues?
- What actions would increase effectiveness?
- Are complainants advised of their rights to seek redress outside of the GRM if they disagree with the outcome of the GRM?
- Percentage of grievances that go unresolved that must then be followed up outside the GRM by SIG or the courts?
- Number of complaints referred to kastom resolution

Organisational learning and improvement

Questions targeted toward organisational learning and improving company policies, procedures, and operations:

- What kind of demonstrable change and improvement is the mechanism producing in project operations, management systems, and benefits for communities?

- How does the mechanism facilitate identification of root causes of conflict?
- What actions has the company taken to address these root causes?
- Is the company adopting any structural changes?

Non-Compliance and Corrective Actions

Should the monitoring programme identify any non-compliance with the GRM and/or other E&S Standards, corrective action will be taken to ensure the relevant activity returns to compliance in a timely manner and that any corrective action is appropriate and effective.

Non-compliances and corrective actions with the GRM procedures will be documented, noting the appropriateness and effectiveness of any corrective actions.