

**SKILLS STRENGTHENING FOR INDUSTRIAL VALUE ENHANCEMENT (STRIVE)
DIRECTORATE OF TRAINING (DGT), MINISTRY OF SKILLS DEVELOPMENT AND
ENTREPRENEURSHIP (MSDE), GOVERNMENT OF INDIA**

**GRIEVANCE REDRESSAL MECHANISM (GRM) INCLUDING PROCUREMENT RELATED
COMPLAINTS**

INTRODUCTION ABOUT STRIVE OPERATION

The Government of India recognizes the need to increase access to and improve the quality and relevance of vocational education and training in the country. An exclusive ministry was formed for Skill Development & Entrepreneurship (MSDE). Government of India has announced several schemes and projects for enhancing the skill development institutions both at the Center and State levels. Skills Strengthening for Industrial Value Enhancement (STRIVE) is one such pioneering initiative, assisted by The World Bank, with the objective of improving the relevance and efficiency of skills training provided through ITIs and apprenticeships. STRIVE is a five-year project that extends till November 2022 and shall incentivize ITIs to improve overall performance including apprenticeship by involving SMEs, business association and industry clusters. The project will be implemented by the Ministry of Skill Development and Entrepreneurship (MSDE) through State Governments, Industrial Training Institutes (ITIs), Centrally Funded Institutes (CFIs) and Industry Clusters (ICs) as the implementing agencies. It also supports two sub-missions of the National Skill Development Mission (NSDM), namely: (i) institutional training, and (ii) trainers.

GUIDANCE NOTE

1. Introduction

1.1. Grievance Redressal Mechanism (GRM): GRM under STRIVE is a critical tool for promoting transparency and accountability in the Project along with playing prominent role in enhancing its operational efficiency and increasing public awareness. The GRM will provide a suitable platform for receiving, evaluating, and facilitating concerns, complaints, and grievances of the affected concerning the project's social, environmental, procurement and any other grievance related to the project. STRIVE is committed to provide a comprehensive mechanism for grievance redressal through online and offline methods, in accordance with prevalent best practices.

1.2. Objective of STRIVE GRM:

- Early detection , identification and indicators of fraud and corruption
- Provide project implementing partners with practical suggestions/feedback regarding project activities and its implementation
- Increase stakeholder engagement and receive feedback
- Enhancement of operation efficiency and timeliness of the Project deliverables
- Promoting accountability and transparency
- Addressing of procurement-related grievances in an effective and timely manner.

13. Audience: This guidance note has been provided for usage by stakeholders of STRIVE. It is presumed that the users of the GRM have basic working knowledge of computers as well as with internet browsing and are acquainted with the basics of a grievance redress mechanism.

14. Purpose: The purpose of this guidance note is to provide an overview of GRM under STRIVE and an interface between the users and the online/offline application form used for submitting a grievance/complaint. It will help users to understand various features of the on-line/offline modes for lodging a grievance/complaint and will enable them to access the grievance system.

15. Principles of STRIVE GRM:

- Objectivity and Fairness: All the grievances are treated confidentially, assessed impartially and handled transparently. It operates independently of all the interested parties in order to guarantee fair, objective and impartial treatment to each case.
- Simplicity and accessibility: The procedures to file grievances are simple, accessible and does not create barriers due to language, location tedious procedures etc. All forms of online and offline mechanism are available for the stakeholders to file grievances and seek actions.
- Responsiveness and efficiency: STRIVE GRM is designed to be responsive to the complainant. The grievances are handled efficiently by the trained Grievance Redressal Officer (GRO) staff who responds promptly within stipulated timeframe to grievances and suggestions.
- Participation: The GRM encourages stakeholders to actively engage with the project to promote accountability and increase its operational efficiency. Matters related to Environmental and Social safeguards and fiduciary aspects under the Project are integral part of the process. GRM promotes stakeholder participation and feedback about service provision/ utilization.

2. Operationalizing GRM

For addressing grievances arising under STRIVE, following grievance redressal mechanism is suggested.

2.1. Value chain

- 2.1.1. The process/GRM value chain for STRIVE is outlined in Table 1 below. The following section also briefly describes the multi-tier GRM with time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required. ITI/IC.

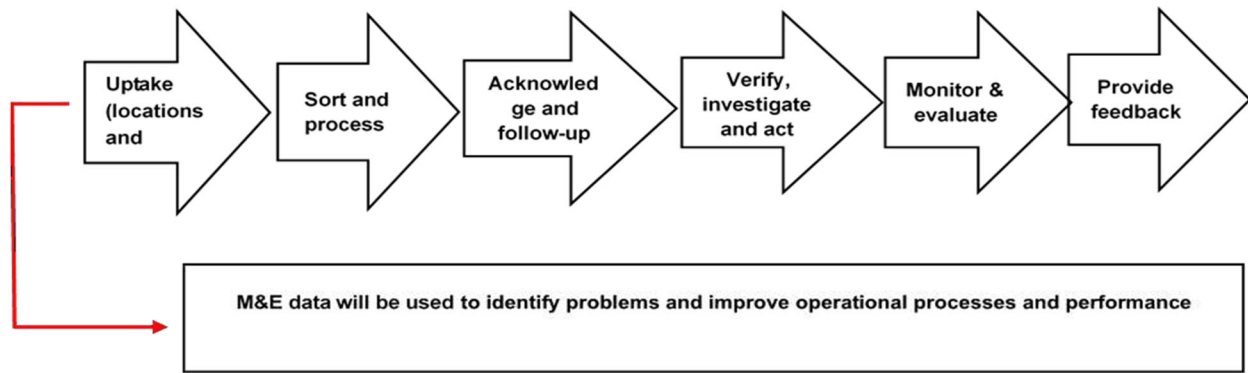


Table 1: Value chain of GRM

22. Appointment of Grievance Redressal Officer

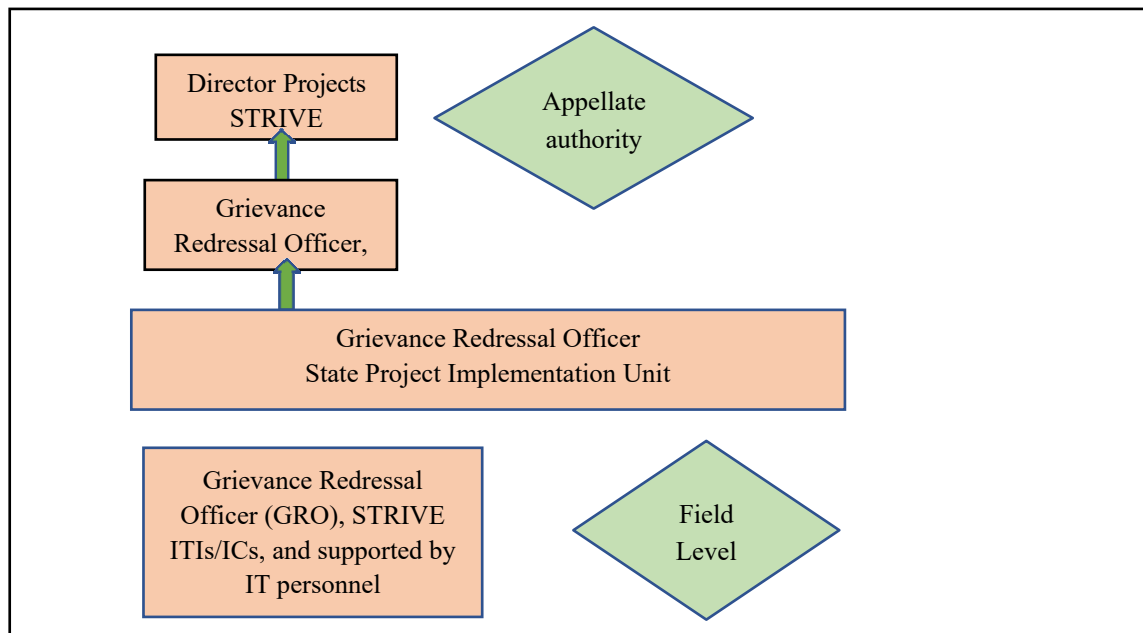
221. The National Project Implementation Unit (NPIU) of the Directorate General of Training (DGT) under the Ministry of Skills Development and Entrepreneurship (MSDE), STRIVE shall nominate an officer as ‘Grievance Redressal Officer’ (GRO) to deal with all matters relating to grievances/complaints, at the National Level. At Implementing Agency (IA) level, i.e., States/Industrial Training Institutes (ITI)/Industry Cluster (IC), the Project Director/Head of the SPIU for STRIVE (in case of States) and Head of the Institute (in cases of ITI and IC) shall designate an official to serve the role of GRO. The GROs, NPIU, SPIUs, and ITI/IC shall be supported by support staff, as needed, to assist in grievance recording. STRIVE shall follow international best practices in the processing of all grievances, including resolving complaints within the stipulated timeline.
222. The list of GROs shall be disclosed by the NPIU, SPIUs, ITIs and ICs (on the institutes’ website) and also displayed by the SPIU/institute/IC in public view. Every office shall display at a prominent place/notice board the name of GRO with location, contact numbers/ mailing IDs and address along with the specific visiting hours for hearing/receiving the grievance/complaints of the public.

23 Procurement Related Complaints : All procurement-related complaints shall be received only in writing or uploaded through the online grievance redressal form available on project website, and shall contain both name of person filing a complaint, and name of firm s/he represents as an aggrieved bidder/supplier/service provider/consultant. All procurement-related complaints shall be treated with utmost confidentiality. It may be noted that absence of complete and relevant information may cause delay in review – a procurement related complaint must contain factual details with verifiable facts and not contain general allegations. *All procurement related complaints shall be duly acknowledged. Reminders from the complainant shall also be duly acknowledged. Acknowledgement of each complaint shall be provided in writing to the complainant preferably within seven (7) calendar days of receipt of complaint.* Anonymous complaints without any information on contact details shall not be acknowledged but shall be duly filed by procuring entities under STRIVE and shall also be considered depending on the merits of the complaint. For example, if a complaint is received during evaluation stage, it shall be examined and shall be included in the Bid Evaluation Report for that particular procurement. *Similarly, each complaint received shall be examined and the complainant shall be provided a response*

appropriately addressing the points raised by the complainant, in addition to the initial acknowledgement and prior to disposal of the complaint. Copies of all correspondence with regard to procurement related complaints shall be maintained for a period of 5 years after closure of STRIVE, and also made available to Program auditors, World Bank team, or to other officials, as appropriate.

24. Complaints Related to Fraud and Corruption : All complaints involving issues related to Fraud or Corruption shall be handled as per Central/State Government laid down procedures and may also be reported to the Office of the Institutional Integrity (INT) (www.worldbank.org/integrity). It may be noted that when allegations of fraud and corruption are substantiated, firms/individuals involved in misconduct are sanctioned from engaging in any new Bank-financed activity¹.

3. GRM Handling Hierarchy: A three-layered GR structure is proposed for STRIVE. The first tier constitutes the phase when grievance/s arises. The complainant will need to contact ITI/IC grievance redress officer in ITI/IC to file complaints (including procurement related). The GRO is required to coordinate with other relevant stakeholders and find a solution to the problem within ten(10) working days. The designated officer/GRO shall record/log the complaint in the complaint register/online form, and if the grievance is not resolved at the first tier, the GRO shall escalate the issue to SPIU's GRO/focal person, the second tier of the GRM. The GRO, SPIU shall try to resolve the issue with support from ITI/IC within Fifteen (15) working days. The problem shall be escalated to the third tier, i.e., NPIU, if not resolved by the GRO, SPIU. The GRO, NPIU shall try to resolve the complaint within thirty (30) working days from the date of receipt at NPIU, and in case of unresolved complaint, escalate the issue to the final tier, i.e., Director Projects (DP), STRIVE. The Director Projects will suggest corrective measures and assign clear responsibilities for implementing its decision within Thirty (30) working days from the date of receipt at NPIU. The complainant will be free to approach the court of law and/or use the Word Bank’s Grievance Redressal Services at any time irrespective of his/her access to GRM.



¹ <https://www.worldbank.org/en/projects-operations/procurement/debarred-firms>

31. Appellate Authority- Director Projects: Director Projects, NPIU, DGET, MSDE shall be assigned as the Appellate Authority, responsible to hear and decide on unresolved appeals against decisions of GRO, NPIU. Pending cases shall be presented by the GRO, NPIU to the Director Projects, who will review and resolve any appeals and provide resolution. Appeals must be resolved within thirty (30) working days from the date of receipt of the complaints in an unbiased manner. In addition, the Director Projects will also be responsible to monitor timely redressal of all grievances/complaints by the GRO, and (ii) monitor grievances related to conflict of interest and arbitration submitted through manual mode and forward to NPIU, and (iii) review and report on the performance of grievances through online and offline mode.

32. GRO, NPIU: The GRO at the NPIU shall be responsible for:

- 32.1. The redressal of complaints received through the SPIUs, and directly for a quick resolution
- 32.2. Monitoring grievances submitted online and following all grievances' timely redressal at the filed level. He/she will also be liable for capturing grievances arising out of project activities, escalating/ flagging those grievances to the appellate authority.
- 32.3. Resolving and addressing complaints (including procurement related) addressed to the NPIU
- 32.4. Conducting thorough examination, analysis or enquiry based on grievance/ feedback received
- 32.5. Monitoring of overall GRM mechanism.
- 32.6. Consolidating and disclosing on its website a quarterly basis, the complaints/record-keeping, per the Table 2. The same shall also be shared with the Bank simultaneously. For reporting on procurement-related complaints, a detailed form is available on NPIU's project website shall additionally be used to monitor and report on procurement related complaints.

S. No	Date of Receipt of Grievance/ Complaint	Name and Contact Details of Complainant	Description of Complaint	Nature of Complaint	Decision Taken	Response Given to Complainant and Date	Closed or Not

Table 2: Format for Quarterly Report on Tracking of Grievances Redressal

- 32.7. Notifying complainant about status of their grievance/feedback.
- 32.8. Analyzing data on grievances and using this to make informed decisions.
- 32.9. Reporting to GRO, NPIU regarding unresolved grievances on weekly basis.
- 32.10. Constituting special committees, if required under special circumstances for Redress of grievance of exigent nature and/or for resolutions of complaints requiring broader or technical inquisitorial procedures.

33. GRO, SPIU: The GRO at the SPIU shall be responsible for:

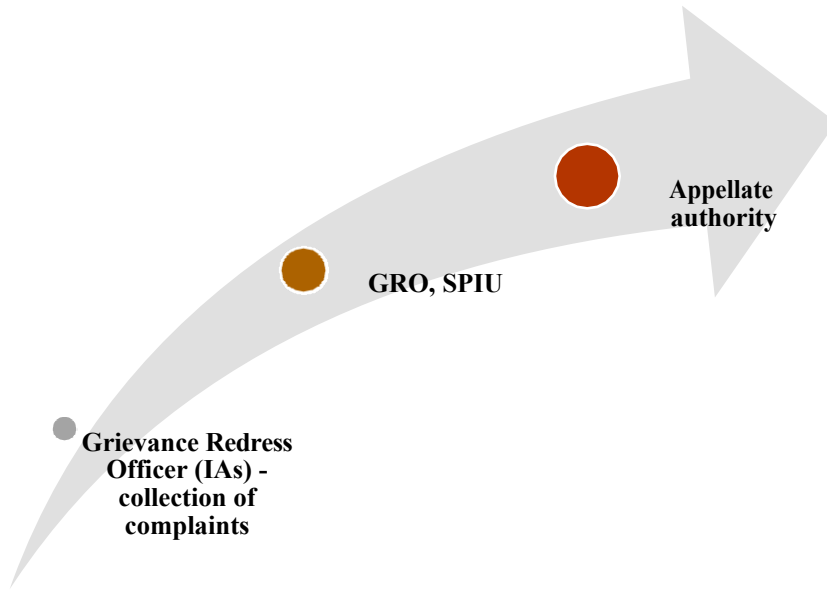
- 33.1. The redressal of complaints received through the ITIs/ICs, and directly for a quick resolution

- 332. Monitoring grievances submitted online and following all grievances' timely redressal at the filed level. He/she will also be liable for capturing grievances arising out of project activities, escalating/ flagging those grievances to the GRO, NPIU.
- 333. Resolving and addressing complaints (including procurement related) addressed to the SPIU
- 334. Conducting thorough examination, analysis or enquiry based on grievance/ feedback received
- 335. Monitoring of overall GRM mechanism.
- 336. Notifying complainant about status of their grievance/feedback.
- 337. Analyzing data on grievances and using this to make informed decisions.
- 338. Reporting to GRO, NPIU regarding unresolved grievances on weekly basis.

34. GRO, IAs: The GRO, IAs shall be responsible for monitoring all grievances/complaints submitted manually through a drop-box, entering them in the GRM register, phone calls, in-person, and letters. All the complaints shall be acknowledged, and a tracking number/ID will be generated in the format Name of Scheme/Name of Department (Name of implementing agency)/State/City/Month/Year/Serial number, e.g., *STRIVE/IC NAME/NAGPUR/MAHARASHTRA/SEPTEMBER/2021/1*. Once registered, all the complaints shall be screened, sorted (based on the complaint's nature), and processed (forwarding to the GRC for resolution) by the GRO in a time-bound manner. An IT support system shall support the GRO cell to register, generate unique IDs, track and file closure reports online and offline. The GRO shall be responsible for capturing grievances arising out of project activities and escalating/flagging those grievances to the GRC. Arrangements shall be made to keep a record of grievances received (offline mode), addressed, and resolved within a specific timeframe, shared with NPIU for onward integration with their project GR database. The format given in table 2 above will be used by the GROs quarterly. It may be noted that all the complaints shall be received only in writing or uploaded through the online grievance redressal form available on project website, and should contain both name of person filing a complaint, and name of firm s/he represents as an aggrieved bidder/supplier/service provider/consultant. Acknowledgement to a procurement related complaint is mandatory (suggested format attached) and shall be provided promptly by the procuring entity (preferably within 7 calendar days of receipt of procurement related complaint). For further details, kindly refer to Paragraph 2.3 of this GRM Note.

The GRO/complaint handling officer will be the most significant officer within the project for redressing the grievances received from the beneficiaries, stakeholders, and other concerned promptly. While addressing a complaint, the GRO may requisition any staff for its assistance and/or constitute a committee (with the institution's head approval), if required, while keeping in mind the confidential nature of the grievance/complaint. The Head of the institution can replace a single member(s) and/or the Committee. Such changes are subject to DP's approvals and prior information to the World Bank, the financier for STRIVE. The Head also can direct ITI/IC staff or devolve functions and power to a particular authority for specific resolution of complaints.

35. Escalation matrix for complaint: The following escalation matrix/process shall be followed for all the online/offline complaints:



4. Grievance/Complaint Submission Process

41. To address the grievances of the STRIVE project stakeholders, STRIVE shall establish multiple channels by which the project can receive grievances. These can be broadly classified as – Online -Services (e.g., Helpline and via the Project web-platform) and Offline/Manual (e.g., Snail Mail, In-Person and at Compliant Centers/Drop-Boxes). For all grievances submitted through online mode, NPIU and SPIUs shall review for sensitivity/confidentiality, assessing any issues on COI (conflict of interest) for the office/personal before such grievances are channeled to the GRO at the field level, i.e., ITI and IC. The offline/manual mode shall be more apt to those without internet and phone connections. However, in the case of offline mode, the concerned officers shall ensure that all the necessary caution and precautions are taken to ensure safety in light of COVID-19. A sample grievance registration form for manual complaints is attached as **Appendix 1**.

42. The detailed stepwise process to be adopted for receiving complaints and addressing (online and offline) is described below:

Online submission:

42.1. The Online e-Services (e.g., Helpline, and via the Project web-platform-online form) shall provide an innovative platform to several GRM, thereby extending the reach, accessibility, and efficiency (e.g., transaction cost) of such modalities. The online webform is available at <https://forms.gle/dsKSLiBh9fWGFCbS8>

STRIVE Grievance Form

In case of any kind of Grievance related to STRIVE project, stakeholders can raise their grievance using this form.

The name and photo associated with your Google account will be recorded when you upload files and submit this form.

422. Upon successfully submitting a grievance, an auto-generated notification confirming successful receipt shall be sent to the individual by revert email on the registered email ID.
423. Following the procedure for review of all grievances², rights to access link of excel sheet of GR form will be provided to all implementing agencies. The concerned responsible GRO will resolve the grievance in stipulated time frame.
424. The concerned GRO shall inform the complainant of the resolution offered (in writing) or orally (unless it is a procurement-related complaint), upon which the complaint shall be considered closed. In both cases, GRO shall document the solution provided.
- 43. Offline/manual GRM process:** STRIVE acknowledges the digital challenges of accessing Online e-Services, particularly in reaching the program's target beneficiaries. To this end –the offline/manual mode of GRM shall be retained to improve the manual process to allow for efficiency in transactions related to a reduction in response times for each grievance. The channels for offline submission include complaint box, phone, post, and in-person. In the case of offline, following information will be provided by the complainant:
- The name of the individual and firm (in case of procurement-related complaint), ITI/IC name, address and telephone number (if any). All procurement-related complaints shall be mandatorily acknowledged promptly (within seven [7] calendar days of receipt). For further information, kindly refer to Paragraph 2.3 of this Note.
 - In case of procurement-related complaint, further details as below (illustrative only) shall need to be provided in the acknowledgement as well as response:
 - *Tender ID and eProcurement portal details* both in case in case the complaint has been made on eProcurement portal of the Government of India³, or tender ID in any case (online or manual procurement);
 - *whether the complaint relates to procurement of goods, non-consulting services, consultancy services or minor civil works;*
 - *whether the complaint relates to Pre-award processes/on-going procurement processes* : These include allegations that a bidding document//Request for

² In case the complaint is received by the GRO, NPIU, after the initial assessment, the complaint shall be forwarded to the concerned SPIU for action and redressal. Similarly, the complaint shall be forward to the GRO, ITI/IC, in case of a complaint received by the SPIU.

³ <https://eprocure.gov.in/cppp/sites/default/files/eproc/Handbook-Grievance.pdf>

Proposal [RFP] document is defective [e.g., it improperly restricts competition, etc.]

- *whether the complaint relates to Award* : These include allegations that a contract award is improper [e.g., that selection was unreasonable or inconsistent with the award criteria, etc.]
- *whether the complaint relates to Post-Award* : These include allegations that a contractor/supplier/consultant is unfairly treated [e.g. delays in releasing payment, wrong imposition of liquidated damages, etc.]

- It may be noted that absence of complete and relevant information may cause delay in review – complaint must contain factual details with verifiable facts and not contain general allegations.
- Copies of all correspondence related to procurement related complaints shall be made available to Program auditors, World Bank team, or to other officials, as appropriate.
- A brief description of the matter, which is the source of the grievance, including copies of any relevant and supporting documents.
- Details of complaint disposal/relief sought from the GRO and/or the procuring entity.

431. Grievances may also be submitted in the Complaint Box kept at reception of every institute/IC. The Complaint Box shall be opened on daily basis by the GRO. Complaints can also be sent by post.
432. A complaint made through electronic means (e-mail) shall also be accepted and replied to, if requested, should be sent through e- mail also.
433. In case the complainant is not satisfied with the response at a certain level, he/ she will be free to approach the next level.

44. Grievance Redressal Procedure

441. Every application received should be tagged with any kind of reference number (file number/Diary No.). The grievance system should be continuous for the whole year.
442. Every application or petition should be acknowledged through standard acknowledgement slips (Diary Dispatch no. of the institute/IC) or a copy of the receipt which should be dispatched to the complainant within 3 days of receipt of complaint or handed over to person at the time of receipt for complaints submitted in person.
443. Every application should carry such a slip for future reference indicating the name, designation and telephone number of the official who is processing the case. The time frame in which a reply will be sent should also be indicated
444. The complainant should be quickly informed of the action taken by way of redressal within proposed response time suggested at each level.
445. A record of all complaints received, and action taken till disposal should be maintained at each level.
446. A reply to any grievance must cover all points raised and not address the grievance partially. If there is any follow-up action, it must be pursued.

447. No grievance is to be rejected without having been independently examined. At a minimum, this means that an officer superior, to the one who delayed taking the original decision or took the original decision that is cause for grievance, should actually examine the case as well as the reply, intended to be sent to the complainant. If a complaint is rejected, the reasons for such rejection must be made explicit and should be intimated to the complainant within the time frame.
448. The Complaints related to PMU will be dealt directly by the GRO of the PMU and redressal will be done as per fixed time frame. The decision of the PMU will be final and will be abided.
449. Grievance redressal mechanisms will consider the vulnerability of gender, SC/ST and other vulnerable populations.

45. Accessibility of the aggrieved person: STRIVE stakeholder's or beneficiary who has successfully submitted a grievance can verify the status of their complaint (s) at any time by referencing the acknowledgment number/tracking ID code provided to them. All claims submitted shall be handled in the utmost confidence, and the NPIU/States/ITIs/ICs will ensure non-disclosure of all personal information. This will extend to additional arrangements for maintaining confidentiality at the individual's request or where matters are considered sensitive.

46. Training on GRM: A comprehensive set of Training on the GRM will be conducted covering the SPIUs and ITIs/ICs. The Training will be cascaded from the NPIU to train implementing agency officials as part of the E&S Training.

47. Periodic Review: The NPIU, supported by the PMC specialist, will periodically review the functioning of the GRM and record information on the effectiveness of the mechanism, especially on the ITI/IC's ability to prevent and address grievances; (ii) all costs involved in resolving the complaints will be borne by STRIVE. The GROs will continue to function throughout the project duration; and (iii) the project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage. Accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

48. World Bank Accountability Mechanism: In addition to the STRIVE GRM, individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to the World Bank Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project affected communities and individuals may submit a complaint to the World Bank independent Inspection Panel, which determines whether harm occurred, or could occur due to World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been allowed to respond. For information on how to submit complaints to the World Bank corporate GRS, visit: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, visit www.inspectionpanel.org.

Appendix: 1 – Sample Grievance Form and Sample Procurement-Complaints Acknowledgement

1. Sample Grievance Registration Form (OFFLINE MODE)

The Skills Strengthening for Industrial Value Enhancement (STRIVE) welcomes complaints, suggestions, queries, and comments regarding project implementation. We encourage persons with a grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback.

Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing (CONFIDENTIAL) above your name. Thank you.

Date	Place of registration				
Contact information / personal details					
Name		Gender Male / Female		Age	
Phone number			Email id		
ITI/IC name & details					
Complaints/Suggestions/Comments/Questions: Please provide details (who, what, where and how) of your grievance below: If included as letter/attachment/note, please tick here					
How you want us to reach you for feedback or update you on your grievance/comments					

For office use only

Registered by: (Name of official registering grievance)	
Mode (Only Offline Mode) ▪ Note/Letter ▪	
Reviewed by (Name/Position of official(s) reviewing complaint)	
Action taken	
Whether action taken disclosed	Yes <input type="checkbox"/> No <input type="checkbox"/>
Means of disclosure	

Suggested Sample Format for Acknowledging Procurement Related Complaints

Sample 1

December 25, 2019

Dear Mr. Sharma,

STRIVE - Procurement of Goods-Procurement of Computers by Government Training Industrial Institute, Bhopal – RFQ Number xxxxxxxxxxxxxxxx-Evaluation of Quotations

Thank you for your email dated December 15, 2019 addressed to xxxxxxxxxxxxxxxx received in our office on December 22, 2019. We acknowledge receipt of the same. We are looking into the matter and shall revert back to you in the next calendar days.

With regards,

Authorized Signatory

Sample 2

February 15, 2020

Dear Mr. Jain,

STRIVE : Procurement of Consultancy Services-Project Management Consultants by State Project Implementation Unit, Madhya Pradesh- Tender ID Reference Number : xxxxxxxxxxxxxx – Shortlist

Thank you for your letter dated February 1, 2020 addressed to xxxxxxxxxxxxxxxx received in our office on February 10, 2020. We acknowledge receipt of the same. We are looking into the matter and shall revert back to you in the next xxxxxxxxxxxxxx calendar days.

With regards,

[Name of Authorized Officer]
