

GRIEVANCES REDRESS MECHANISM - SELECT



1 Introduction

The Grievance Redress Mechanism (GRM) is an institutional arrangement that allows stakeholders to address grievances¹ related to the Project through a timely, transparent, and efficient process. The Project Grievance Redressal Mechanism (GRM) is consistent with the requirements of the World Bank Environmental and Social Standards (ESSs) to ensure mitigation of community concerns, risk management, strengthen systems and processes, maximize environmental and social benefits and contribute positively to service delivery.

The Project GRM is gender-responsive and readily accessible to the stakeholders at no cost and without retribution. It is usually observed that if stakeholders have inadequate means to voice and resolve grievances, they may turn to other cumbersome and lengthy avenues, leading to delays in the sub-project. During sub-projects execution, different issues and constraints may arise. The GRM will enable Project Affected Persons (PAPs) and all stakeholders to raise their concerns arising from the project activities.

GRM information & Standard Operating Procedures (SOPs) will be widely display at the PMIU, Allied Institutions, DEO offices and all sub-projects sites in English, Urdu & Sindhi. Culturally appropriate communication will be used at all sub-projects sites both to spread awareness regarding the GRM process as well as complaints management. In Component 2, the GRM will be fully functional before contractors mobilize at sites for civil work. The complainants will be given an option for filing their complaints anonymously. The GRM will only address complaints that will be related to aspects of the SELECT Project, with robust complaint tracking, resolution and feedback/follow-up mechanism. The GRM will endeavor to resolve all project related complaints, and if necessary, forward them for judicial and administrative actions when required.

For dealing with GBV, SEA/SH, VAC & HT complaints, specific protocols will be taken to ensure confidentiality. Furthermore, there will be additional GRMs for laborers (as per ESS2 requirements of the World Bank).

2. Objectives of GRM

The overall objective of the GRM is to provide a robust system of procedures and processes for transparent and rapid resolution of complaints identified during the project lifecycle.

¹ A grievance is defined as any formal communication that expresses dissatisfaction about an action or lack of action, about the standard of services/ works, deficiency of service related to the Project management and its' implementation mechanism.

Specific Objectives

1. To provide a systematic process for complaints registration and to provide a prompt, transparent and fair resolution without reprisals for the affected stakeholders in sub-project areas.
2. Increasing stakeholder involvement in the sub-projects, by providing fair access to diverse members of the local community, including vulnerable groups such as women, youth and persons with disabilities.
3. To provide sub-project staff with guidance/feedback that allows them to be more effective, and responsive to the needs of the beneficiaries.
4. To demonstrate responsibility towards the local community by mitigating any adverse environmental effects caused by the sub- project.

3. GRM Structure

The institutional mechanism for GRM consists of three tiers:

Central Grievance Redressal Committee (CGRC)

A CGRC will be established at the Project Management & Implementation Unit (PMIU) which will be responsible for managing all complaints. PMIU-SELECT will serve as the secretariat and main repository for the GRM. The CGRC will be responsible for addressing complaints, and overseeing the complaint management of the entire GRM process. All complaints will be recorded in an in the Project dashboard, while ensuring that the confidentiality of the SEA/SH and VAC complainant is maintained by providing access to only DGRM focal person for SEA/SH & VAC & Gender Specialist PMIU. The CGRC will be responsible for providing a summary of the complaints received and action taken against them. CGRC will also be responsible for uploading the summary on the Project website at the periodic bases. This information will be shared anonymously.

According to the CGRC Notification, it will be headed by the Chief Program Manager (RSU). The members of CGRC will be the project coordinator, social safeguard specialist (PMIU), gender specialist (PMIU), representatives of Women Development and Social Welfare Departments, Director General Planning (Development & Research, SELD), Additional Secretary (PD&F) and a focal person from PMIU. He/she will be receiving complaint(s) through writing, calls, fax and emails and will have resources and facilities to maintain a complaints database which will be digitized and available online and will communicate with the contractor, Site Engineers, and Project Manager.

District Grievance Redressal Committee (DGRC)

The DGRCs will be notified in all 12 districts of the Project. It will address complaints referred by the CGRC where resolution requires involvement of district level officials. The DGRCs will be

headed by District Education Officer (DEO), XEN Education Work, Chief Monitoring Officer, Taluka Officer, representative of Women Development & Social Welfare Departments, District Coordinator LSU-RSU, Co-opted Member/ SMC Members for any relevant complaint & any Co-opted member from community.

Grievance Redress Cell (GR Cell)

At the site level, a GR Cell will be established to enter concerns/grievances. The Community Liaison Officer (CLO), as appointed by the Contractor, will serve as the Focal Person. The CLO will be responsible for registering grievances and maintaining all records. Furthermore, the community will nominate the Grievance Focal Persons (GFPs) at each sub-project site. These will be men and women whom the community can easily approach. Grievances will be received by GFPs or the CLOs in writing or by word of mouth, and will be recorded in the grievance register by the CLO. The contents of the grievance register will be updated by the CLO, and will be shared monthly with the Grievance Redress Committee (GRC) at PMIU level. This will enable the GRC to maintain a consolidated record of all Project grievances. The contractor and the sub-project manager are responsible for resolving site-level grievances. If a grievance remains unresolved, it will be sent in writing by the project manager of each sub-project to GRC.

The responsibilities of GR Cell will include the following:

- I.** Review and resolve grievances at the site level.
- II.** Conduct fact-finding pertaining to grievances.
- III.** Resolve grievances within a period of one week.
- IV.** Maintain confidentiality of complainants by referring complaints to the SEA/SH focal persons & not disclosing nature of other complains to the outsiders.
- V.** Maintain an updated GRM database/ complaints Log.

During the investigation of the complaint, the DGRC will work with the contractor and the sub-project Manager. If mitigation measures are identified in the investigation, the contractor will promptly carry out the mitigation activities. The DGRC is responsible for ensuring that the contractor carries out the measures and report to CGRC.

4. Grievance Focal Persons (GFPs)

CGRC

The Project Director is primarily responsible for overseeing the GRM. The Deputy Project Coordinator (DPC), at the PMIU level, is the focal person responsible for ensuring that GRM procedures are followed. The Social Safeguards Specialist will work closely with DPC. However, the DPC may constitute a separate team, or delegate tasks to other persons as the need may arise.

DGRC

The Education District Officers (EDOs) are primarily responsible for leading the DGRC at the district level.

GR Cell

The CLOs will be the focal persons for the GRM at the sub-project sites. The GFPs will be trained by the PMIU on the grievance redress mechanism. The GFPs will be responsible for making the community aware of the following components:

- The GRM and how it works, including the various types of complaint.
- Grievances which are not relevant to the SELECT Project
- Intake channels at the GRM, e.g., phone numbers, postal, email addresses and website.
- Inform the Complainant of the investigation results and the action taken, and the option of appeal to PSC if not satisfied with the outcome.

5. Complaint Registration Channels

The following modes will be used to register complaints in the GRM.

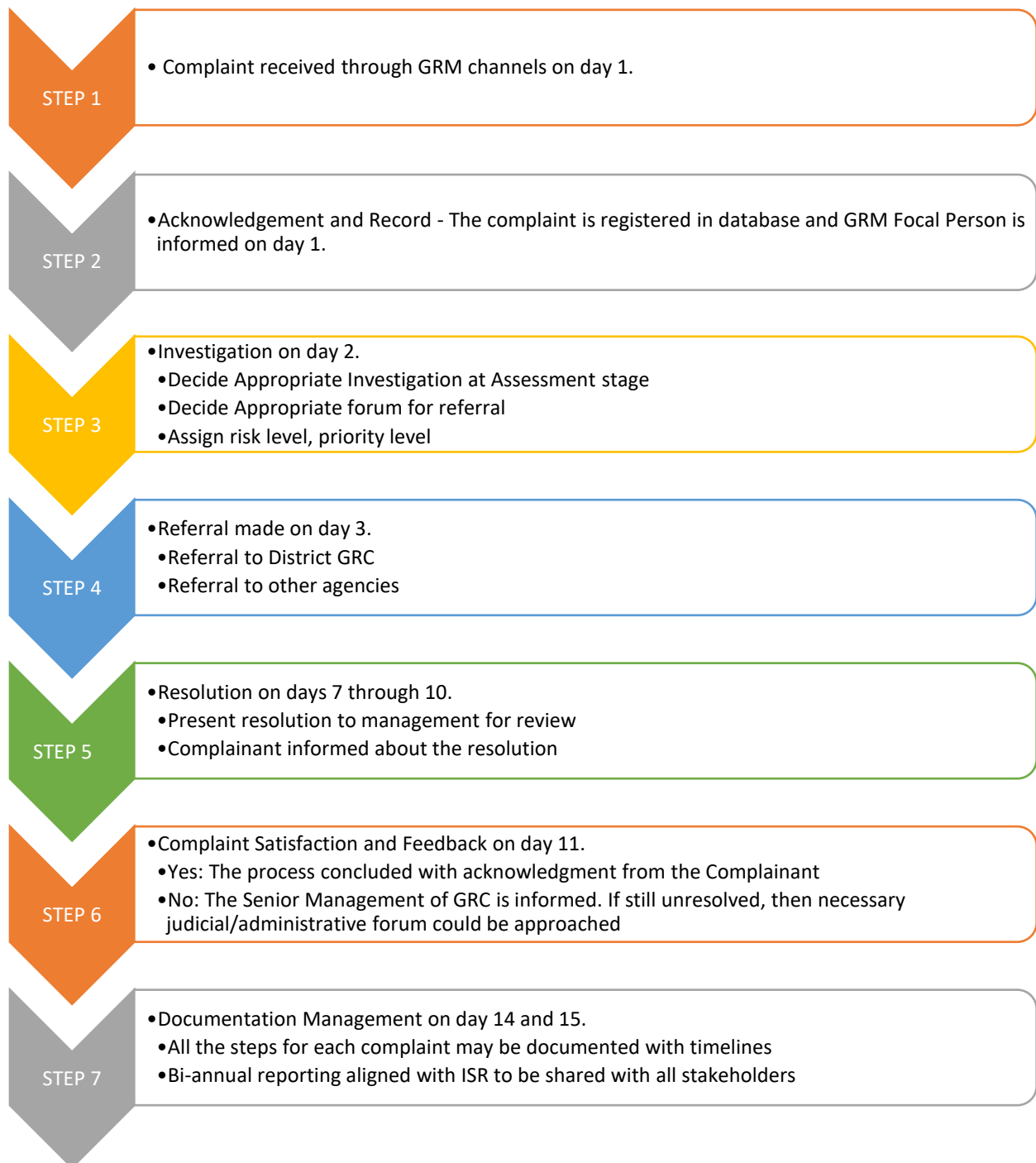
1. **Complaint Register:** A complaint register will be present at every sub-project site. It will be the responsibility of the GRM focal person to make monitor the complaint register daily, and sign at the time of inspection. The complaint register will be designed at the PMIU.
2. **Complaint Box:** There will be one visible complaint box at every sub-project site. It will be the responsibility of the GRM focal person to inspect the complaint box and forward the complaint to PMIU after entering the information in the complaint register.
3. **Phone Number:** It will be the responsibility of the GRM focal person at PMIU to widely publicize the complaint number for the project. It will be a universal access toll free number (0800 number) issued for the project. The phone number must be managed by staff trained in handling complaints, and there must be one female staff available at each site for handling complaints of a sensitive nature.

4. **WhatsApp Number:** This number will be available on WhatsApp for quick conversation and/or exchange of any photographic evidence regarding a grievance/complaint.
5. **E-Mail:** It will be the responsibility of the GRM focal person to create an email ID and publicize it in the communities.
6. **Web-Portal:** The project website will have a dedicated section for complaint registration.
7. **Complaints may also be sent in writing by post/mail** to the PMIU-SELECT at the following address: 47-E/1, 48th Street, Block #06, PECHS, Near Nursery, Shahrah-e-Faisal, Karachi

Below are Complaint Channels

S.NO	CHANNEL	DETAIL
01.	UAN	111-735-328
02.	WhatsApp / SMS/ Call	0317-8222566
03.	Email	grm.select@gmail.com
04.	Website	www.rsu-sindh.gov.com
05.	Office Address	47-E/1, 48 TH Street, Block #06, PECHS, Near Nursery, Shahrah-r-Faisal, Karachi

6. Complaint Registration Process/Flow



7. Sexual Exploitation & Abuse/Sexual Harassment (SEA/SH), Gender-Based Violence (GBV)

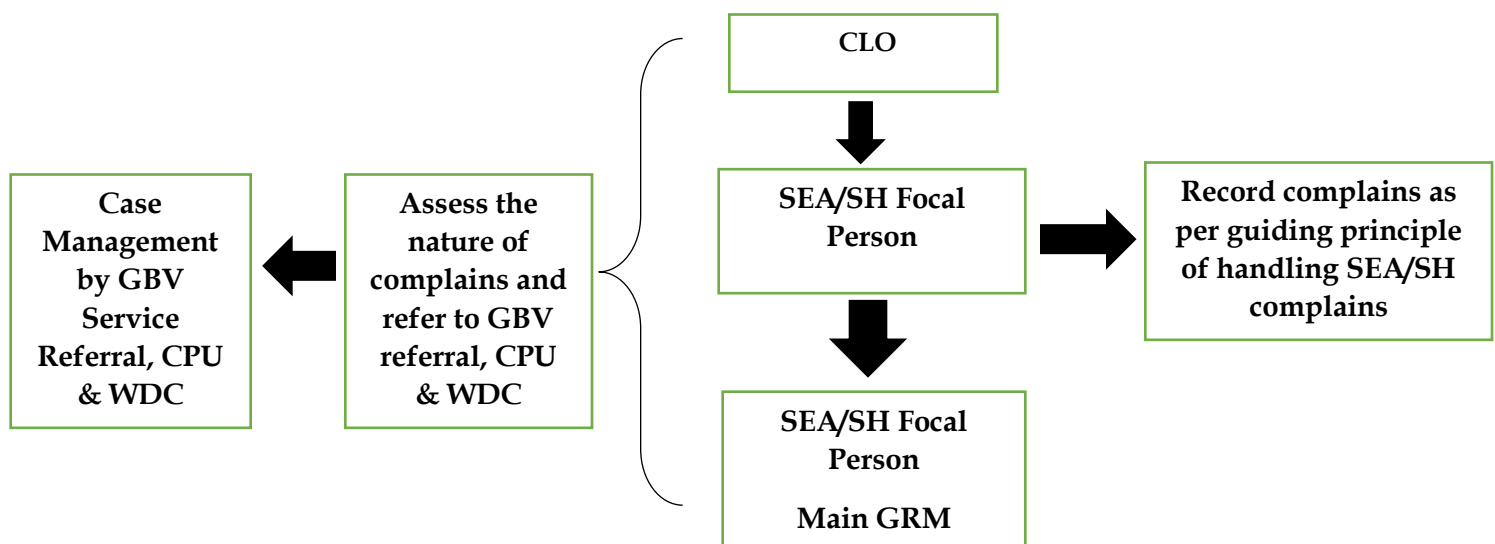
The risks of SEA/SH, GBV, VAC & HT are high during project execution. Considering labor movements and the movement of female staff for various trainings, a thorough sensitization on gender issues is required. SELECT focusses on girls' access to education, and the involvement of the girlchild poses significant risks. The GRM is designed to take up such sensitive matters with the highest priority. The project will conduct trainings on GRM, gender-based violence, laws and handling of GBV, SEA/SH, VAC and HT cases through GRM.

8. Procedure for handling SEA/SH & VAC cases through GRM

When a complaint will be received at the Grievance Redressal Cell (GRC), the Community Liaison Officer (CLO) will immediately refer the victim to Gender focal person at DGRC. She will record the complaint in the Project dashboard & inform PMIU Gender Specialist and will remain actively involved in the complaint resolution process. Together, they will assess the nature of the case and with the consent of the complainant, make referrals accordingly. These referrals could be made to the Child Protection Unit (CPU) and Women Development Cell (WDC), both of which are active in all districts of Sindh. The PMIU will sign an MoU with the CPU and WDC to ensure smooth process of complaint resolution.

All this will be done in 24 hours due to sensitive nature of complaint. The complaints will be communicated to the World Bank Gender team no later than 48 hours after being received by the DGRC female focal person to main GRC focal person who is the Gender Specialist PMIU.

The following actors will be involved to handle the complaints; (1) the Community Liaison Officer (CLO), (2) SEA/SH and VAC Focal Persons at DGRC & CGRC and (3) GBV Service Referral



Referrals will be made to existing service providers as per the need of the case. service providers ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. It will be ensured through a Memorandum of Understanding (MOU).

9. Features of the Grievance Redressal Mechanism (GRM)

The GRM for SELECT will follow the guiding principles and comply with the following Environment & Social (E&S) standards as below.

9.1 Accessibility and Availability

Information about the GRM will be made readily available to all the stakeholders including beneficiaries. The Social Safeguards Specialist at the PMIU will be responsible for ensuring that the GRM is well-advertised and easily accessible, including through a community engagement. This may include bulk SMS, radio/television/newspaper announcement, visible tab at the project website etc. The awareness raising will be done in local languages and will inform the community on the process of registering the grievances and the emphasis on confidentiality. The GRM will be sensitive to gender, age and disability. The principle of non-discrimination will be respected when receiving, processing and handling the complaints.

9.2 Transparency

The process for the GRM will be transparent, with PMIU maintaining a record of all the complaints. The resolution will be communicated to the complainant within the agreed time frame. The feedback about the outcomes and redressals from the complainant will also be recorded.

9.3 Confidentiality

The project GRM will be sensitive to complaints of a sensitive nature and their due requirement for confidentiality. The Grievance Focal Person at the PMIU will ensure that the identifying details of the complainant are kept confidential. Confidentiality will cover all information in a complaint that may lead to the identification of a specific incident or those affected by the allegation. This applies to the survivor and witnesses, but also the identity of the alleged perpetrator. Confidentiality requires that information gathered about the allegation not be shared with persons or entities unless there is explicit permission granted by the complainant. Even in such cases, information-sharing will take place on a strict need-to-know basis, limited to the following information: (i) age and sex of survivor; (ii) type of alleged incident (as reported); (iii) whether the alleged perpetrator is reported to be associated with the project (Y/N, as indicated by the survivor); and (iv) whether the survivor is referred onwards. Protocol for reporting GBV, SEA/SH

and VAC cases to the Bank mentioned in the World Bank “Environmental and Social Incident Response Toolkit” (ESIRT) will be followed.

9.4 Minority Groups Sensitivity

Information about the project GRM and complaint lodging procedure will be physically displayed in age-appropriate and accessible language/signage in all targeted schools for the benefit of both students and teachers. In addition, the project will establish a variety of grievance redressal channels to ensure disadvantaged groups (illiterate, disabled, minorities etc.) have confidential and accessible means to lodge complaints.

9.5 Survivor-Centered Approach

In all prevention and response actions, Survivor-Centered Approach will be adopted which keep remain central the survivor’s safety, confidentiality, choices, needs, and well-being. The survivor’s physical and psychological safety as well as that of their family remains a priority at all times.

9.6 Considerations regarding children and persons with intellectual disabilities

When the survivor is a child, the best interests of the child is the governing principle. Children are considered incapable of providing 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. Anyone under the age of 18 will consider a child. Similar additional considerations and protective safeguards may also apply where the complainant or survivor is a person with intellectual disabilities.

9.7 Clear Resolution Procedure

The resolution procedure of the complaint is simple. The basic principle adhered to is ‘anything that can be resolved at the lower level, must be resolved at the lower level’. Escalating complaints to higher levels unnecessarily might incur delays. However, depending upon the sensitivity of the complaint, the Grievance Focal Person will decide the appropriate course of action for complaint redressal. Highest priority will be assigned to any complaint regarding blatant violation of the law of the land, SEA/SH, GBV and VAC, or failing on Environmental and Social Commitment Plan (ESCP).

9.8 Judicial/Administrative Mediation

The GRM does not substitute for the judicial or administrative mediation, remedies or arbitration available under the law of the land. Such mediation may be necessary beyond the scope of the GRM. The existing GRM addresses the issues before they reach the level where judicial or administrative actions are required.

9.9 Documentation & Reporting

The Grievance Focal Person at the PMIU will be responsible for documenting every complaint, assigning it tracking numbers, and noting actions taken under each complaint and the feedback obtained from the complainant. All the complaints received will be categorized and analyzed. The complaints will be compiled in a database and necessary indicators related to complaints resolution will be made. On the basis of this analysis, pre-emptive remedial measures, policy decisions or administrative orders will be made to minimize the risk of complaints at other places. This database will be used for reporting within the PMIU, for the Project Steering Committee (RSC), and also for reporting to World Bank.

9.10 Internal Evaluation

The Project Coordinator will be responsible for monitoring and evaluating the GRM based on key KPIs:

1. Percentage of complaints resolved within the timeframe of 15 days.
2. Percentage of complaints resolved to the satisfaction of the complainant through direct action or appropriate referrals by the GRM
3. Average time of complaint resolution for the project
4. Percentage of re-emergence of a complaint under each category
5. Daily/monthly/yearly trends of the complaints
6. Any other KPI deemed necessary by the GRC

9.11 Project Workers and Contractor's Complaints

All complaints of project staff, workers, labor, contractors and sub-contractors related to labor management and working conditions will be referred to and resolved as per the dedicated GRM provided in the SELECT Labor Management Procedure.

ANNEXURE 1 (III)



**SINDH EARLY LEARNING ENHANCEMENT THROUGH
CLASSROOM TRANSFORMATION (SELECT)
SCHOOL EDUCATION & LITERACY DEPARTMENT
GOVERNMENT OF SINDH.**



UAN: 111-735-328

What's App # 0317-8222566

Email: grm.select@gmail.com

GRIEVANCE/COMPLAINT FORM

COMPLAINANT INFORMATION		TRACKING #	
Complainant Name		Phone #	
CNIC Number		Email Address:	
Gender			
Address			
Nature of complain	1) Administrative	2) Civil Work	Submission Date Time _____
	3) Social/Community	4) Training	
	5) Environmental	6) GBV/ SEAH	
	7) Procurement	8) Any other	
COMPLAINANT STATEMENT			
<p align="center">Complainant signature/ Thumb</p>			
FOR OFFICE USE			
ACTION TAKEN/ REFERRAL			
GFPs	DGRC	CGRC- SELECT	GBV/ SEAH
			SE&LD
			ANY OTHER FORUM
Remarks			
Name of School	Semis Code	Uc	Taluka
Name of Complain Recorded Staff		Designation	Contact & Email
<p>Note: - If complain relates to GBV/SEAH, Please refer to GBV prescribed Form.</p>			
<p>Grievance Focal Person Signature</p>			



**SINDH EARLY LEARNING ENHANCEMENT THROUGH
CLASSROOM TRANSFORMATION (SELECT)
SCHOOL EDUCATION & LITERACY DEPARTMENT
GOVERNMENT OF SINDH.**



UAN: 111-735-328

What's App # 03178222566

Email: grm.select@gmail.com

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						ايڊريس / پتو								
انتظامي (i)						ii) تعميراتي								
iii) سماجي						iv) سکيا								
v) ماحولياتي						vi) جنسي ٻارن سان زيادتي								
vii) مهيا ڪرڻ خريداري						viii) ٻيو								
تاريخ جمع شڪايت						وقت								
ت ڪندڙ جو بيان														
شکایت ڪندڙ جي صحيح/ نشان														
صرف آفيس استعمال لاءِ														
حوالو / ڪاروائي														
GFPs		DGRC		CGRC- SELECT		GBV/ SEAH		SE&LD		ANY OTHER FORUM				
ريمارڪس														
اسڪول جو نالو			سيمس ڪوڊ			يوسي			تعلقہ			ضلعو		
شکایت وصول ڪندڙ جو نالو			عهدو			فون نمبر يا اي ميل								
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**SINDH EARLY LEARNING ENHANCEMENT THROUGH
CLASSROOM TRANSFORMATION (SELECT)
SCHOOL EDUCATION & LITERACY DEPARTMENT
GOVERNMENT OF SINDH.**



UAN: 111-735-328

What's App #_0317-8222566

Email: grm.select@gmail.com

شکایت فارم

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ANNEXURE 1 (IV)

Report #: _____ Date of Entry: _____
(Report # and Date of Entry to be completed by GBV Coordinator)

Date of Entry:

(Report # and Date of Entry to be completed by GBV Coordinator)

(To be completed at the discretion of the reporting body)

Month:				
Source of Report:				
Primary []		Secondary []	Media []	
Basic Information:				
Date of Incident:				
Time of Incident:		Morning []	Afternoon []	Evening [] Night []
Total number of survivors:				

Incident Type	
Domestic Violence	[]
Physical Assault	[]
Rape	[]
Sexual assault	[]
Harmful traditional practice (i.e. Honor killing, Swara)	[]
Denial of access to services	[]
Psychological/Emotional abuse (i.e. Harassment)	[]
Forced/child marriage	[]
Trafficking	[]
Other	[]

Survivor	Male	Female
Under age 10	[]	[]
Age 11 - 15	[]	[]
Age 16 - 18	[]	[]
Age 19 - 25	[]	[]
Age 26 - 35	[]	[]
Age 36 - 50	[]	[]
Over age 50	[]	[]

Perpetrator	[]
Family member	[]
Community Member	[]
Stranger	[]
Uniformed Services	[]
NGO/Aid Worker	[]
Other	[]
Aged 10 - 15	[]
Aged 15 - 18	[]
Aged 18-30	[]
Over 30	[]
Unknown	[]

Context	
Outside the home	
Water point	[]
In transit to water point	[]
School	[]
In transit to school	[]
Latrine	[]
In transit to latrine	[]
Market	[]
Other	[]
Inside the home	[]
Outside the community	
In transit to market	[]
In transit to point of origin	[]
While working in the field	[]
In a health facility	[]
While using public transit	[]
Other	[]
Unknown	[]

[illegible]

Service Provision/Referrals Provided	
Direct Services Provided	[]
Health services	[]
Mental Health/Psychosocial support	[]
Legal Aid	[]
Survivor safety (shelter, safe house, etc.)	[]
Child Protection	[]
Other	[]
None	[]

Referrals Made	
Health services	[]
Mental Health/Psychosocial support	[]
Legal Aid	[]
Survivor safety (shelter, safe house, etc.)	[]
Child Protection	[]
Other	[]
None	[]

Case Notes:



GOVERNMENT OF SINDH
SCHOOL EDUCATION & LITERACY DEPARTMENT
 Karachi, Dated: 26th October, 2022

NOTIFICATION

NO.S.O.(G-III)SELD/RSU/GRC/PMIU-SELECT/ 2022: With the approval of Competent Authority PMIU Grievance Redressal Committee is hereby constituted to address grievances at the Project level.

1. Chief Program Manager(RSU)	Chairman
2. Project Coordinator SELECT	Member
3. Director General Planning Development & Research SELD	Member
4. Additional Secretary (PD&F), SELD, Govt. of Sindh	Member
5. Social Safeguard Specialist PMIU-SELECT	Member
6. Representative of Women Development Department	Member
7. Representative of Social Welfare Department	Member
8. Gender Specialist PMIU SELECT	Member
9. Focal Person PMIU-SELECT	Member

Term of reference (ToRs) of the PMIU Grievance Redressal Committee.

- The GRC shall investigate all complaints referred to it by the GRM Focal Person and refer the complaints to the relevant District GRC or any other external agency if required.
- The GRC shall resolve all complaints referred to it as per the requirements, procedures and timelines stipulated in the SELECT GRM.
- The GRC shall keep strong follow up with District GRC for resolution of the complaints
- The GRC shall assist and enable the district GRC by providing necessary guidelines, and also monitor the performance of the District GRC
- Undertake analysis of data on grievances and use this to make informed decisions from time to time, for effectiveness of the GRM;
- Constitute special committees, if required, for redressal of a grievance of exigent nature and/or for resolutions of complaints requiring additional procedures;
- The GRC shall take decisions for referring the complaint for judicial/administrative forums in deemed necessary
- Maintain an updated on-line GRM database/Complaints Log, and approve GRM related KPIs for performance appraisal of the GRM, and make such reports to the PSC & WB from time to time

GHULAM AKBAR LAGHARI
SECRETARY TO GOVT. OF SINDH

NO.S.O.(G-III)SELD/RSU/GRC/PMIU-SELECT/ 2022: Karachi, Dated: 26th October, 2022.

A copy is forwarded for information & necessary action to:-

1. The P.S to Minister, Education & Literacy Department, Sindh, Karachi.
2. The P.S to Secretary, School Education & Literacy Department, Govt. of Sindh, Karachi
3. Office Order File.
4. Official Website.



SECTION OFFICER (G-III)



GOVERNMENT OF SINDH
SCHOOL EDUCATION & LITERACY DEPARTMENT
 Karachi, Dated: 26th October, 2022

NOTIFICATION

NO.S.O.(G-III)SELD/RSU/GRC/PMIU-SELECT/2022: With the approval of Competent Authority District Grievance Redressal Committee is hereby constituted to address referred by the PMIU GRC for resolution at the district level.

1.	District Education Officer	Chairman
2.	XEN Education Works (Project	Member
3.	Chief Monitoring Officer	Member
4.	Concern Taluka Officer	Member
5.	Representative of Women Development Department	Member
6.	Representative of Social Welfare Department	Member
7.	District Coordinator LSU-RSU	Member
8.	Co-opted Member/SMC Members for any relevant complaint	Member
9.	Any Co-opted Member from community	Member

Term of reference (ToRs) of the District Grievance Redressal Committee.

- The District GRC shall act the first forum of complaint redressal for all complaints arising within the District which are forwarded by the GRM Focal Person at the PMIU or the PMIU CRG.
- District GRC shall investigate and resolve grievances as per the requirements, procedures and within the timelines stipulated in the SELECT GRM.
- District GRC shall, as per the guidelines provided by the PMIU GRC, escalate the complaint to appropriate forum (if an external department/agency is involved) if required.
- District GRC shall maintain follow up with the external department/agency and ensure resolution of the complaint.
- District GRC shall report about the complaint redressal to the PMIU within specified time period.
- District GRC may give proposals/suggestions to the PMIU for any specific decision to alleviate recurrence of complaints.
- Constitute special committees, if required, for redressal of a grievance of exigent nature and/or for resolutions of complaints requiring additional procedures.

GHULAM AKBAR LAGHARI
SECRETARY TO GOVT. OF SINDH

NO.S.O.(G-III)SELD/RSU/GRC/PMIU-SELECT//2022: Karachi, dated: 26th October, 2022.

A copy is forwarded for information & necessary action to:-

1. The P.S to Minister, Education & Literacy Department, Sindh, Karachi.
2. The P.S to Secretary, School Education & Literacy Department, Govt. of Sindh, Karachi.
3. Office Order File.
4. Official Website.



SECTION OFFICER (G-III)

ANNEXURE 3 (I)

[illegible]