



**Development Bank
of Jamaica Limited**
Facilitating Economic Growth & Development

Adopted: March 23, 2023

Institutional and Project Level Grievance Redress Mechanism for Development Bank of Jamaica Limited

DEVELOPMENT BANK OF JAMAICA LIMITED

Institutional and Project Level Grievance Redress Mechanism for Development Bank of Jamaica Limited

1.0 INTRODUCTION

1.1 Background

Development Bank of Jamaica (DBJ) Limited, is a wholly owned Government company created in 2000 as a result of mergers with other development-related institutions, including the Agricultural Credit Bank of Jamaica, the National Development Bank of Jamaica and, in 2006, the National Investment Bank of Jamaica.

Through its customer-centric approach, DBJ provides opportunities to all Jamaicans to improve their quality of life through development financing, capacity building, Public Private Partnership and Privatization solutions, in keeping with Government policies and the sustainable development goals. Additionally, DBJ facilitates the growth and development of all viable enterprises in the productive sectors of the Jamaican economy.

Environmental and social sustainability was recognized as a fundamental aspect of achieving outcomes consistent with DBJ's commitments; therefore, an Environmental and Social Safeguards Policy with internationally recognized standards was developed, with the intention to guide relevant operations within DBJ. It was also prudent for the DBJ to create a Grievance Redress Mechanism (GRM) to address issues, concerns, or claims (perceived or actual) that an individual, group or community may want or need addressed and resolved. It is important to note that this mechanism does not address employee grievances as there is a separately established policy and procedure to treat with grievances of that type.

The GRM will form part of DBJ's Environmental and Social Management System (ESMS), with the aim of supporting the implementation of the Environmental and Social Safeguards Policy (ESSP) with respect to programmes and projects.

1.2 Purpose

The purpose of the GRM is to provide specific guidance on how to receive and facilitate resolution of affected stakeholders' concerns and complaints related to the environmental and social performance of any project or programme financed by DBJ.

1.3 Objectives

The Specific Objectives of the GRM are to:

- Receive and address any concerns, complaints, notices of emerging conflicts alleging actual or potential harm to affected person(s) or communities, arising from projects or programmes being implemented, financed, or supported by the DBJ.
- Assist in resolution of grievances between and among stakeholders, such as the various government Ministries, Departments, Agencies, Non-Government Organisations, communities, in the context of projects or programmes being implemented, financed, or supported by DBJ.
- Operate in a flexible, collaborative, fair and transparent manner aimed at problem solving and consensus building.

2.0 GUIDING PRINCIPLES OF THE GRM

The GRM should effectively and efficiently receive and respond to concerns and complaints arising from the various projects and programmes being implemented, financed, or supported by DBJ and should provide efficient routes for stakeholders to raise issues about project and programme implementation and performance.

The GRM is based on a guiding framework established with the following key principles:

- **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently thereby ensuring that the process does not infringe on people's human rights
- **Objectivity and Independence:** The GRM operates independently of all interested parties to guarantee fair, objective, and impartial treatment in each case.
- **Simplicity and Accessibility:** The processes involved in filing grievances and seeking redress are accessible, simple and easy to understand.
- **Responsiveness and Efficiency:** The GRM is designed to be responsive to the needs of all complainants.
- **Speed and Proportionality:** All grievances, regardless of complexity, are addressed and resolved in a timely manner.
- **Participatory and Social Inclusion:** All stakeholders are equally encouraged to report grievances to the attention of the Grievance Manager.

3.0 THE GRIEVANCE PROCEDURE

3.1 Scope

The GRM will apply to stakeholder environmental and social complaints, perceived or actual, related to all DBJ supported programmes and/or projects. **The mechanism does not restrict or prevent access to judicial or administrative resolutions and**

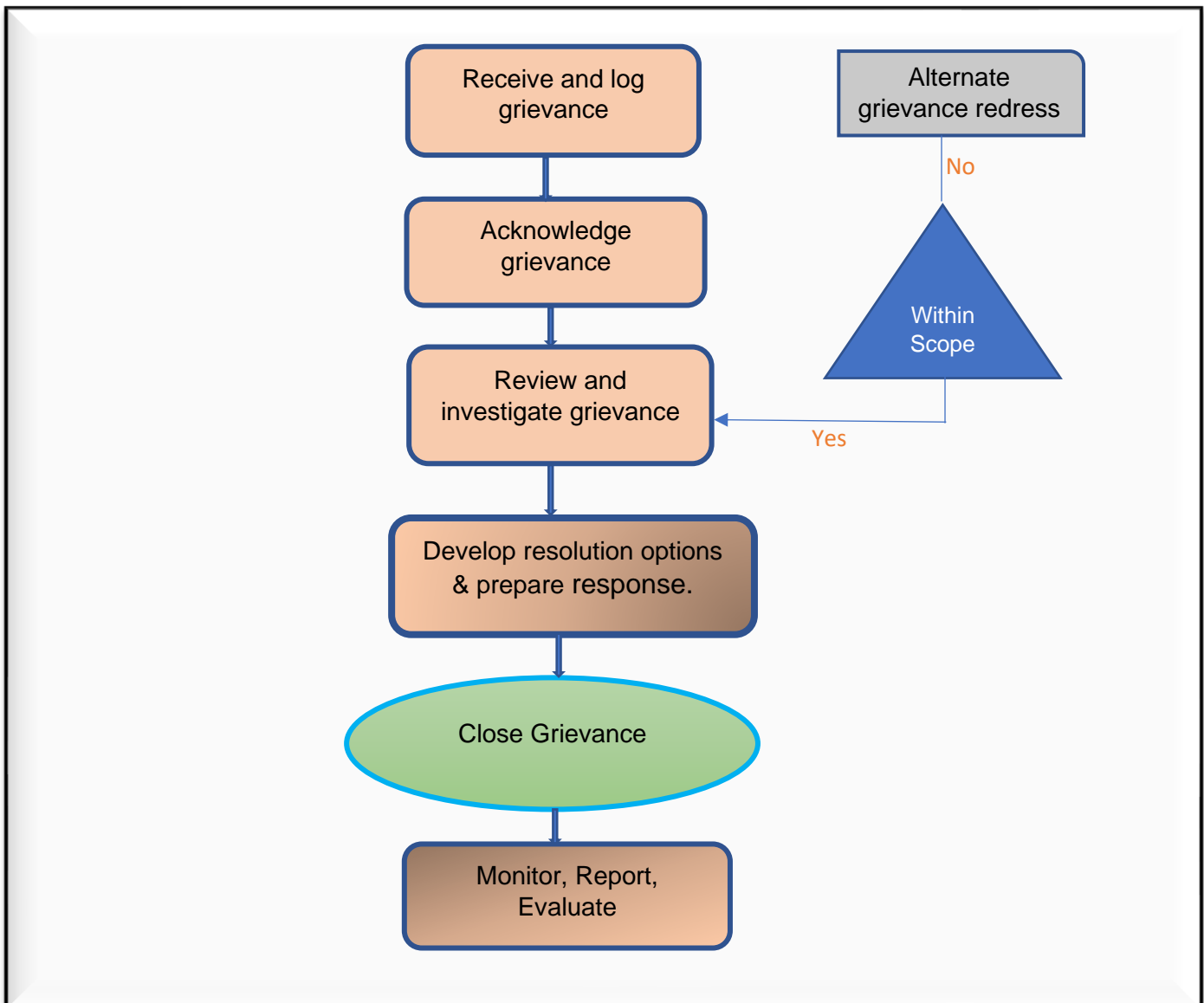
will adhere to relevant areas of the overall Whistle blower Policy, 2017; in particular, the area relating to the use of the platform in making complaints anonymously.

3.2 The Grievance Redress Mechanism - Procedural Steps

Affected parties may lodge/register a grievance using the following process:

Steps	Process
1	Receive and log/register grievance
2	Acknowledge grievance
3	Review and investigate grievance
4	Develop resolution options & prepare response
5	Close grievance
6	Monitor, report and evaluate

Flow Diagram - Grievance Redress Procedural Steps



Step 1. Receive and Log/Register Grievance

- Any party¹ affected by a DBJ funded project or programme and has a reasonable belief that the project or programme may potentially result in having an adverse environmental, social, health and safety impact, may report same as a grievance/complaint or concern using the GRM process.
- Complainants may utilize DBJ's anonymous platform for complaints as stated in the Whistle blower Policy where the issue will be logged, registered, and managed by the General Manager (GM) – Audit Services, who will act as the Grievance Manager, independent of the Project Management Office. There will be a register that is constantly tracked, and all relevant E&S related complaints will be forwarded to the Grievance Manager. Grievances or concerns from a stakeholder or their representative may be anonymously logged using any one or more of the following format:

Email: dbj@intercitycounts.ca

Telephone: 1 (855) 212-0881 (Toll Free)

Online Report Form: www.integritycounts.ca/org/dbj

- Grievances or concerns from a stakeholder or their representative may also be communicated in person, or over a telephonic conversation, or in written form to DBJ through mail or email using the following details:

Name: The Grievance Manager

Phone number: (876)929-4000; (876)619-4000

Email: grm@dbankjm.com

Address: Development Bank of Jamaica Ltd., 11A-15 Oxford Road, Kingston 5

Where this format is used, a unique reference number will be assigned to each reported complaint or grievance and recorded on a Stakeholder Grievance Redress Form (See Appendix 1).

Step 2. Acknowledgement of Grievance

- After the grievance has been recorded in the Grievance Register, a formal acknowledgement of receipt of the grievance will be communicated to the affected party by the anonymous online system via email.
- If received via direct email, in person or over the telephone, a written acknowledgement will be prepared and forwarded to the complainant by email or mail, where applicable.
- Where the grievance is deemed to be outside the scope of the GRM, the complainant will be informed, and an alternate means of redress recommended.

¹ Party – person(s) or entity/organization

Step 3. Review and Investigate Grievance

- The complaint will be reviewed by the Grievance Manager and a determination made of the validity of the complaint.
- A determination will also be made whether the grievance can be resolved immediately or requires further investigation.
- Depending on the nature of the complaint, various units or departments may need to get involved, or senior management, if their direction and decision is required.
- An extensive investigation may be required in circumstances where the grievances are complex or widespread and cannot be in a timely manner.

Step 4. Develop Resolution Options & Prepare Response

All grievances will be dealt with on a case-by-case basis having regard to the nature of the grievance, frequency of occurrence, and the number of complainants.

The Grievance Manager, in consultation with the relevant Division/s or Senior Management, shall seek to identify a suitable resolution to the grievance.

The resolution process may take the following steps:

- i. An incident investigation team will be convened and tasked with seeking resolution to the grievance within 30 days of receipt of complaint. This may entail site visits and dialogue with affected parties towards finding a solution to the grievance. Alternatively, it may involve investigating the underlying cause(s) of the grievance and implementation of any changes to prevent a recurrence of a similar grievance.
- ii. During the 30 days of dialogue and/ or investigation, the Grievance Manager will co-ordinate conflict resolution activities necessary to contain and resolve actual or potential conflicts arising from the reported grievance.
- iii. An Incident Investigation Report will be completed and presented to GM-Strategic Services Division and/or Senior Management within 30 days of the investigation.
- iv. The preferred course of action will be discussed with the affected person(s) to ensure resolution of the grievance.
- v. The resolution or notice of further consultation, will be communicated in the form of a written response to the complainant(s) within 14 working days of completing any investigation. Both parties will be required to sign to the agreed resolution.
- vi. If wider consultation is necessary, grievances will be forwarded to the Managing Director who will identify an adequate resolution or provide an alternate resolution to the grievance or refer the issue to a third party within 14 days of receipt of the complaint/grievance from the investigation team.
- vii. In matters of a complex nature where a resolution cannot be reached within the stated timeframe, an interim written response will be provided that informs

the stakeholder(s) of the delay, the reason for the delay, and a revised date for next steps.

Step 5. Closure of Grievance

- A written response will be given to the complainant(s) outlining the decision reached, along with stipulated mutual commitments, if any.
- The Grievance Manager will close off the investigation through acknowledgement and sign-off from the complainant(s) as indication that the grievance has been resolved.
- In the event that the previous intervention does not result in a resolution, the following may apply: -
 - The affected party or complainant may refer their grievance to a dispute resolution mechanism outside of the DBJ's GRM.
 - Where arbitration is necessary, appropriate government involvement may be requested.
 - As a last resort, aggrieved parties have a right to take legal action. This is a more formal rights-based approach that shall only be taken if all other approaches have failed or when there are serious conflicts about facts and data. The final decision will be taken by the arbitrator or any other final approach, with agreement of the parties.

Step 6. Monitor, Report and Evaluate

- The Grievance Redress process will be monitored monthly, as part of the broader routine of environmental and social monitoring. The process will include tracking the number of grievances received and resolved, determining broad patterns, trends, and recurring problems, and assessing the effectiveness of the grievance mechanism.
- Special/ individual reports will be created for grievances considered complex and escalated to the Managing Director, the Board of Directors and/or third-party intervention, where necessary.
- Finally, it is expected that lessons learnt will be captured throughout the process that would aid in updating the procedure/system towards being more efficient, effective, and transparent.

Monthly internal reports will be compiled and transmitted to the GM, SSD. The reporting template will entail:

1. Number of grievances logged as per grievance register;
2. Nature of grievances received;
3. Percentage of grievances resolved;
4. Percentage of grievances outstanding;
5. Time taken to resolve each complaint;
6. Number of grievances escalated to MD;
7. Number of grievances that utilized legal or third-party intervention; and
8. Ongoing efforts at resolutions and status.

A detailed report will be prepared on an annual basis.

4.0 FINANCIAL INTERMEDIARIES

Financial Intermediaries shall inform the DBJ of any grievance associated with any DBJ financed project or programme, in accordance with the General Agreement between DBJ and the affiliated Financial Intermediaries.

The GRM was prepared with guidance from the following:

1. <https://www.jsif.org/sites/default/files/Grievance%20Redress%20Mechanism%20Policy.pdf>
2. <https://www.erm.com/contentassets/6bdbb76b347f4e9fb9b9c14054806210/annexes/annex-e---grievance-mechanism.pdf>

5.0 APPENDICES

Appendix 1

STAKEHOLDER GRIEVANCE REDRESS FORM			
Reference #:	Date received:	Grievance Recorded by:	
1. COMPLAINANT'S DETAILS			
Name of Complainant/Organization (Optional):			
Address:	Contact #:	Email address:	Method Grievance Lodged
			<input type="checkbox"/> In person <input type="checkbox"/> By telephone <input type="checkbox"/> Community meeting <input type="checkbox"/> Email <input type="checkbox"/> Mail
Signature of complainant (optional)			
Date:			
2. DETAILS ON GRIEVANCE			
Date of Incident/Grievance (where applicable):			
Description of Grievance: <i>Describe issue being reported - What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>			
Frequency of Occurrence of Incident/Grievance:		Date of Incident:	
<input type="checkbox"/> One time			
<input type="checkbox"/> More than once (<i>How many times?</i> _____)			
<input type="checkbox"/> Ongoing (<i>Currently experiencing the problem</i>)			
Additional Comments:			