



Center for Implementation of Investment Projects

Grievance Redress Mechanism (GRM) Guidelines At Project Level

2025

Dushanbe, Republic of Tajikistan

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I. Introduction

Transparency and accountability are core principles for any project that “Center for Implementation of Investment Projects” (hereinafter, CIIP) implements.

The grievance redress mechanism (hereinafter, GRM) established within each project implemented by CIIP will be duplicated and maintained throughout the implementation of the project while considering the donor requirements and the specifics of the project.

This GRM acknowledges and incorporates the principles and requirements of the funding agency's Environmental and Social Policy (ESP) and Gender Policy (GP). This mechanism ensures that project-affected communities and stakeholders have accessible, transparent, fair and effective means to communicate concerns about environmental and social impacts of activities funded by international climate finance entities.

The goal of the GRM is to strengthen accountability to beneficiaries and provide channels for project stakeholders to provide feedback on project activities. It provides a mechanism that allows for the identification and resolution of issues affecting the project, including safeguards related complaints, misconduct of staff, misuse of funds, abuse of power, and other improper behavior. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently negatively affecting citizens/beneficiaries and serves as important feedback and learning mechanism that can help improve project impact

The GRM established under each project is accessible to all, including ethnic, religious, gender, and other special groups. The mechanism focuses not only receiving and recording complaints but also on how complaints are resolved. The GRM is supported by an information campaign and training. While feedback should be handled at the level closest to the complaint, but all complaints should be centrally registered and follow the basic procedures set out in this chapter.

In addition, the CIIP is required to disclose certain Project information to the public in accordance with its Public Disclosure Policy, to enhance transparency and accountability, improve discourse with affected stakeholders, and foster good governance.

II. Definition of the GRM

For the purposes of this Guidelines, a GRM is a process for receiving, evaluating and addressing project-related complaints from affected communities at the level of the projects implemented by and for CIIP.

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

III. GRM scope and use

The GRM specifically addresses concerns related to environmental and social principles of the funding agency, including but not limited to compliance with the law, access and equity, marginalized and vulnerable groups, human rights, gender equality and women's

empowerment, core labor rights, indigenous peoples, involuntary resettlement, protection of natural habitats, conservation of biological diversity, climate change, pollution prevention, public health, physical and cultural heritage and lands and soil conservation.

SCOPE: [Name of the project] includes a grievance redress mechanism that will be available for project stakeholders to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

WHO CAN USE THE GRM? Project beneficiaries, project affected people (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the GRM for the purposes of making complaints or providing complaints. Project Affected People (PAP) include those who will be affected in resettlement issues.

WHO IS MANAGING THE GRM? The [Name of the project] activities in Tajikistan are managed by the Project Implementation Unit at the CEP. It is the intention that project management has the primary role in resolving complaints. Moreover, CIIP would require its executing entities to establish and implement GRMs of their own.

WHEN CAN A COMPLAINT BE MADE? Complaints can be expressed any time throughout the project preparation and implementation.

DONOR's GRIEVANCE REDRESS SERVICE: Communities or individuals may also submit complaints to the donor's Grievance Redress Mechanisms (GRS). However, communities/individuals/PAPs should first use all options in the project-level GRM before resorting to the GRS. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.

There is no charge for making a complaint or conveying comments or suggestions.

IV. Procedures

1. Channels to make complaints

The project will establish the following channels through which citizens/beneficiaries/ PAPs can make complaints regarding project funded activities.

- a. A dedicated email address _____ TBD
- b. A dedicated phone line _____
- c. Feedback books are kept by each technical consultant in their offices
- d. Letters sent to Shamsi 5/1, Committee for Environment protection, Dushanbe
- e. On the CEP website www.tajnature.tj
- f. Verbal or written complaints to project staff (directly or through project meetings). (If project stakeholders provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels.
- g. Project meetings set up at the project site/s level, each of which include women.

The project shall ensure flexibility in the channels available, make sure that different contact points are available for a person to make a verbal complaint, and that complaints addressed to the wrong person or entity are redirected to the Social specialist who will act as the GRM Officer.

To ensure accessibility for all potential users, the GRM will make special provisions for individuals with limited literacy, disabilities or language barriers. The project will ensure that GRM materials are available in local languages and accessible formats.

2. Confidentiality and conflict of interest

Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. To safeguard this, multiple channels for submitting complaints have been established. Furthermore, any conflicts of interest will be avoided during the grievance redress process. Specifically:

- Confidentiality: The identity of the complainant will be kept confidential, unless otherwise requested by the complainant. This includes cases where the complainant's identity is known.
- Conflict of Interest: The GRM Officer will ensure that all individuals involved in the handling of complaints (e.g., those investigating complaints) have no material, personal or professional interest in the outcome of grievance or any professional or personal connections with complainants or witnesses.
- Handling of Complaints: The GRM will ensure that complaints are directed to the appropriate person/entity, and that no personal biases or professional relationships will influence the complaint resolution process.

3. Collection/receipt of complaints

The person receiving the complaint will complete a grievance form (see Annex A) or make the form available to the complainant to fill out directly, and submit it without delay to the GRM Officer. The complaints for **[Name of the project]** will be collected and compiled by the GRM Officer every two weeks.

4. Categorization of complaints

Once the complaint is filed, the GRM Officer will be responsible for sorting the feedback. Below are examples of categories that could be used to categorize the complaints:

No.	Classification
Category 1	Environmental safeguards and social issues including gender, labor and resettlement

Category 2	Grievances regarding violations of policies, guidelines and procedures
Category 3	Grievances regarding contract violations
Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
Category 5	Grievances regarding abuse of power/intervention by project or government officials
Category 6	Grievances regarding CIIP staff performance
Category 7	Reports of force majeure
Category 8	Suggestions
Category 9	Appreciation

5. Recording/logging

Once the complaint has been categorized, the GRM Officer logs the details regarding the complaint into the tracking system. This system may be manual (hard copy) or connected to the project MIS system. GRM files should be stored in a secure setting (password protected IT database or locked storage cabinet for hard copies).

Once a complaint has been logged and sorted, the GRM Officer refers the case to the Project coordinator. The latter shall determine the following:

- The person responsible for investigating the complaint.
- The timeframe within which the complaint should be resolved.
- The agreed course of action (e.g. investigation, reply not requiring investigation, etc.).

The investigation process is determined based on the nature and gravity of the complaint:

- For local level complaints, the investigation will be conducted by the First Investigating Officer in 30 days.
- For complex complaints, the investigation will be conducted by the Second Investigating Officer as designated by the Project coordinator in 60 days or as otherwise agreed with the GRM Officer.¹

For grievances related to environmental and social safeguards, the GRM Officer will prioritize these cases and aim to provide initial responses within one week.

6. Clarification on timelines and communication for complex complaints

To strengthen transparency and maintain trust, the GRM will establish a clear communication protocol:

¹ For complex and severe complaints, senior management should be informed and assign responsibilities for conducting the investigation. Senior management should also take part in the investigation and invite observers and external experts.

- Complainants will receive regular updates on the status of their case, at least once every 15 calendar days, especially if the resolution extends beyond the initially expected timeframe.
- If additional time is needed beyond the 60 days (due to higher-level interventions or external technical inputs), the GRM Officer will formally notify the complainant, explain the reasons, and provide a revised resolution timeline.
- All such updates and notifications will be documented in the grievance tracking system to ensure accountability and traceability.

When determining who will be the investigating officer, the GRM Officer will ensure that there is no conflict of interest, i.e., all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the MIS/logbook.

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications.

7. Notification to the complainant

If the complainant is known, the GRM Officer will communicate the timeframe and course of action to her/him by phone, email or mail, within two weeks of receipt of the grievance.²

Where the complainant's address is available, this should be provided in writing with a tracking number and the deadlines by which they will hear back from the IG (see Annex B – Notification Form).

8. Investigation

The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. Verification normally includes site visits, review of documents, a meeting with the complainant (if known and willing to engage) and a meeting with those who could help resolve the issue (including formal and informal village leaders or other leaders).

With regards to resettlement and grievances related to valuation of assets conducted for the project, a second or third valuation may be undertaken until an assessment is accepted by both parties. These additional valuations will be conducted by qualified independent assessors. The cost of such additional valuations will be borne by the party who disputes the previous valuation results.

² This two-week timeframe assumes the number of grievances is relatively small. The time service standard will be adjusted if the volume of grievances increases beyond a manageable level.

The results of the verification and the proposed response to the complainant will be presented for consideration to the Project Coordinator.

Once the decision has been made on the course of action and on the response to provide to the complainant, the Investigating Officer describes the actions to be taken in the grievance form (see annex A), along with the details of the investigation and the findings, and submits it to the GRM Officer, who enters it into the MIS.

9. Stakeholder engagement in grievance handling

To ensure that the concerns of affected communities and relevant stakeholders are effectively addressed within the context of projects by international climate finance agencies, the following measures can be taken:

- Joint Verification: Actively involving affected communities and relevant stakeholders in the process of verifying the issues raised.
- Regular Consultations: Organizing ongoing consultations with stakeholders throughout the resolution process to ensure their concerns are continuously addressed.
- Empowerment Through Transparency: Empowering stakeholders by allowing them to actively track the status of their complaints throughout the resolution process.

The GRM will maintain documentation of all consultations and engagement activities throughout the grievance resolution process. Special attention will be given to ensuring culturally appropriate engagement with indigenous communities and marginalized groups, with accommodations made for language, accessibility and traditional decision-making processes where applicable.

10. Response to complainant

If the complainant is known, the GRM Officer will communicate the proposed action to her/him in the same format as was the original complaint filed - via letter, email, or verbally. The complainants will also be informed by letter on how she/he can appeal the decision made in the initial case.

The GRM Officer will request feedback from the complainant as to whether she/he deems the decision(s) satisfactory, and this will be recorded along with the details of the complaint and the response taken.

In the event the complainant is satisfied with the response, discussions will be held in a group or individually to further clarify the positions at stake. Senior management will take part in these meetings and a final decision on the action(s) will be made.

11. Possibility to appeal

The complainant is not precluded from appealing outside the project/IG GRM³ if they are not satisfied with the proposed response.

12. Escalation to external grievance mechanisms

If a complaint cannot be resolved through the project-level GRM within one year, or if the complainant is not satisfied with the resolution provided, they will be informed of their right to file a complaint directly with the funding agency's grievance mechanism. The GRM Officer will provide complainants with information about how to access such external grievance mechanism, including contact details and procedures. The project will cooperate fully with any inquiries or investigations conducted by the external grievance mechanism.

13. Publication

Once the case is resolved, the complaint and the actions taken to handle it will be disclosed in the CEP webpage tajnature.tj. The identity of the complainant will remain confidential.

V. Awareness-raising

1. Information provided in an accessible format

Information about the grievance handling system will be distributed to all beneficiaries and project affected people through regular information channels used by the project, including initiating meetings at the start of the project, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online, facilitation and training activities conducted through the project. Organizations contracted to provide facilitation support for investment financing will be required to cover the operation of the GRM under their contracts, but this should be considered complementary to other methods given above and not a substitute.

The IG will include information provided on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

2. Proactive advertisement/regular public information campaigns

Annual campaigns will be designed by the GRM Officer and the M&E Specialist to encourage the use of the GRM and publish information on complaints received and resolved. The campaigns will use local media (e.g. TV, newspaper, radio). When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups.

The campaigns should include information on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, principle of confidentiality and right to make anonymous complaints.

³ An alternate dispute resolution mechanism such as a court of elders or to the formal legal system, or the World Bank GRS.

3. Proactive identification of issues

The GRM will incorporate proactive measures to identify potential environmental and social issues before they escalate into grievances. This includes regular stakeholder consultations, participatory monitoring involving affected communities and periodic assessments of project activities against the funding agency's and CIIP's Environmental and Social Policy requirements. These proactive measures will be documented and reported to the funding agency as part of regular project reporting.

VI. Staffing and capacity-building

1. Roles and responsibilities

The Project coordinator will allocate responsibilities to Social Specialist (unless the GRM is outsourced). These will be documented in the first Quarterly Progress Report and kept updated.

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording/logging of complaints
- Notification to the complainant
- Sorting/categorization of complaints
- Investigation
- Decision-making based on the investigation results
- Processing appeals
- Publishing responses to complaints
- Organization and implementation of information materials and awareness campaigns
- Budgeting of the GRM
- Reporting and feedback on GRM results
- Sharing quarterly reports on GRM with RCU

2. Capacity-building for staff involved in grievance resolution

Training for all relevant staff and relevant stakeholders will be held annually, or as otherwise agreed. New staff will receive training as a regular part of the onboarding process. The training will include all aspects of the GRM set out in this chapter. It will emphasize accountability to the complainant and will include information on the GRM principles and procedures. The training will have an emphasis on accountability to the complainant. A key focus at the outset will be shifting from informal complaint resolution to the logging of all complaints/feedback into this system.

In addition to the existing training plans, specific training modules will be introduced to align with the relevant funding agency's policies, particularly in handling environmental and social complaints. This will ensure that staff are equipped with the knowledge and skills necessary to apply their environmental and social safeguards in the grievance resolution process.

Training will include:

- Environmental and Social Safeguards: Training on the application of funding agency policies to ensure complaints are handled in compliance with principles of sustainability and respect for human rights.
- Ongoing Capacity-building: Regular capacity-building sessions will be incorporated into the training plan to enhance the skills and effectiveness of GRM staff, enabling them to handle complex issues arising from environmental, social and climate challenges.
- Handling Complaints with Sensitivity and Rigor: Staff will be trained to address complaints with both sensitivity and rigor, ensuring that the diverse concerns of affected communities and stakeholders are considered and respected.

Dedicated training will be provided to staff directly engaged with beneficiaries, those managing the GRM and those involved in the oversight and evaluation of the GRM.

3. Feedback mechanism for complainants

To strengthen the accountability of the grievance process and ensure continuous improvement, a formal mechanism for ongoing feedback from complainants will be introduced.

The introduction of structured feedback tools—such as surveys or follow-up interviews—will enable complainants to provide detailed feedback on their experience throughout the grievance process. This feedback will help identify opportunities for improving the GRM process as a whole, enhancing efficiency, transparency and the responsiveness of the system.

The feedback mechanism should:

- Gather input on the clarity, accessibility and effectiveness of the GRM process.
- Measure stakeholders' satisfaction with how their complaints were handled.
- Provide an opportunity for complainants to suggest improvements or identify gaps in the system.
- Ensure that feedback is regularly reviewed to adapt and strengthen the GRM based on complainant experiences.

VII. Transparency, monitoring and reporting

1. Transparency

Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available online, as well as on local/ministerial notice boards and other permanent displays. They will be updated quarterly.

2. Regular internal monitoring and reporting

The Project coordinator will assess the functioning of the GRM and undertake spot checks during regular supervision visits. The GRM Officer will work with M&E specialist to:

- Ensure accurate entry of GRM data into the management information system or other system. Produce compiled reports to the format agreed with the Project Manager.
- Provide a monthly/quarterly snapshot of GRM results (as set out below) including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

During annual/bi-annual general meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

3. Alignment with the funding agency's GRM policy

To strengthen alignment with the funding agency's grievance redress policy, CIIP will ensure that projects funded by such agencies fully comply with the relevant funding agency's grievance redress policy. To this end, CIIP will upgrade its grievance tracking, monitoring and reporting mechanisms. Specifically:

- Real-Time Tracking: Implement a robust system enabling real-time tracking of grievance statuses, accessible to GRM staff and relevant stakeholders.
- Comprehensive Reporting: Produce regular, detailed reports that extend beyond mere counts of grievances. These reports will include statistical breakdowns (e.g., by grievance type, geographic area, stakeholder group) and qualitative analyses to identify trends, root causes and systemic issues.
- Public Disclosure: Share grievance resolution reports periodically with the Adaptation Fund and make them publicly available, adhering to the project's transparency commitments while safeguarding complainant confidentiality.
- Integration with the funding agency's Mechanisms: Inform stakeholders about the availability of the funding agency's external grievance mechanism for cases where the CIIP's GRM does not yield a satisfactory resolution within a year.
- Gender and Social Inclusion: Ensure the GRM is gender- and age-inclusive, addressing potential access barriers for women, the elderly, persons with disabilities, youth and other marginalized groups.

4. Quarterly and annual progress reports submitted to the donor

Quarterly and annual progress reports shall include a GRM section which provides updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting, etc.).
- Quantitative data on the number of complaints received, the number that were relevant and the number resolved
- Qualitative data on the type of complaints raised, the responses provided and details of any complaints that remain unresolved,

- Time taken to resolve complaints
- Number of grievances resolved at the lowest level, raised to higher levels.
- Satisfaction with the action taken
- Any particular issues faced with the procedures/staffing or use
- Factors that may be affecting the use of the GRM/beneficiary feedback system
- Any corrective measures adopted

All reports submitted to the funding agency will include a dedicated section on environmental and social safeguards implementation, highlighting any grievances related to environmental and social principles, their resolution status and remedial measures taken. The reports will specifically track grievances by gender, vulnerable group status and the relevant principle category to ensure comprehensive monitoring of social and environmental impacts.

5. Oversight and review

The status of the development of the GRM, the levels of use by beneficiaries/ citizens, the challenges of implementation, etc. will be discussed in semi-annual/annual portfolio meetings. CIIP will discuss with the Bank during implementation support missions any corrective measures that may be needed.

An independent review/audit of the GRM, will be conducted prior to the mid-term review to assess the effectiveness and use of the mechanism, and recommend introduce improvements as necessary.

6. Documentation and record keeping

The GRM will maintain comprehensive documentation of all grievances, including those related to environmental and social impacts under the relevant funding agency's ESP and GP. This documentation will include, at minimum:

- date of receipt
- detailed description of the issue
- categorization according to the funding agency's relevant principles, where applicable
- actions taken to investigate
- findings
- proposed resolution
- communication with the complainant
- whether resolution was accepted or rejected by the complainant
- implementation of any corrective actions.

All documentation will be maintained for the duration of the project plus five years, in accordance with the funding agency's retention requirements.

VIII. Budgeting

An earmarked budget for the GRM will be included in the budget of the project proposals. The budget will include the costs for the following GRM related activities as described above under the allocations/duties for the Social and M&E specialists, as well as for other specialists as needed for further investigations.

The GRM budget will include, but is not limited to, the following components:

1. Awareness-Raising and Information Dissemination

- Initial and periodic campaigns to raise awareness about the GRM among stakeholders and beneficiaries.
- Development and distribution of materials explaining how to access and use the GRM.

2. Costs Related to Complaints Handling:

- Establishment and management of the channels selected for making complaints (costs for phone lines, software, suggestion boxes or apps)
- Categorization of complaint investigation (may involve site visits, expert assessments or mediation—each requiring time and resources)
- Communication with complainant (includes printing, postage, phone calls, or digital platforms)
- The appeals process (may require independent review or panel setup, which must be budgeted)

IX. ANNEX A – GRIEVANCE/INQUIRY RECORD

GRIEVANCE/INQUIRY RECORD (Form A)	
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and sent to the GRM Officer at the national office. Attach any supporting documentation/letters as relevant.</i>	
Date Grievance Received:	Name of Staff Completing Form:
Grievance Received (check ☒):	

☐ National	☐ Oblast	☐ Raion	☐ Jamoat	☐ Village
Mode of Filing Inquiry or Grievance (check ✓):				
☐ In person	☐ Telephone	☐ E-mail	☐ Phone Text Message	☐ Website
☐ Grievance/Suggestion box	☐ Community meeting	☐ Public consultation	☐ Other	

Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: ☐ Male ☐ Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Raion:	Jamoat:	Village:
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				

	Category 1	Environmental safeguards, and social issues including gender, labor and resettlement
	Category 2	Grievances regarding violations of policies, guidelines and procedures
	Category 3	Grievances regarding contract violations
	Category 4	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
	Category 5	Grievances regarding abuse of power/intervention by project or government officials
	Category 6	Grievances regarding CIIP staff performance
	Category 7	Reports of force majeure
	Category 8	Suggestions
	Category 9	Appreciation

Who should handle and follow up on the grievance:

Progress in resolving the grievance (e.g., answered, being resolved, settled):
Other Comments:

X. ANNEX B – NOTIFICATION FORM

GRIEVANCE ACKNOWLEDGEMENT (Form B)	
<i>Instructions: This form is to be completed by the GRM Officer and mailed or delivered to the complainant.</i>	
Date Grievance Received:	Tracking Number:
Grievance Received (check √): ☐ National ☐ Oblast ☐ Raion ☐ Jamoat ☐ Village	
Mode of Filing Inquiry or Grievance (check √): ☐ In person ☐ Telephone ☐ E-mail ☐ Phone Text Message ☐ Website ☐ Grievance/Suggestion box ☐ Community meeting ☐ Public consultation ☐ Other _____	
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i> Gender: ☐ Male ☐ Female	
Contact information for the Person Raising Grievance: <i>(information is optional and confidential)</i> Email: Phone: Address:	
Deadline for Response from DWLI (60 days from date grievance received): 	