



**Center for Implementation of Investment Projects**

# **GRIEVANCE REDRESS MECHANISM**

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**Dushanbe, Republic of Tajikistan**

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## 1. Introduction and Purpose

The Grievance Redress Mechanism (GRM) of Center for Implementation of Investment Projects of the Committee for Environment Protection (CIIP) provides a clear, accessible and responsive channel for receiving, addressing and resolving complaints, concerns or grievances related to CIIP's operations. The mechanism ensures that all grievances are treated fairly, transparently and without retaliation. The GRM applies to employees, partners, project stakeholders and members of the public who engage with CIIP's activities.

### 1.1 Scope

The GRM covers grievances related to all CIIP operations. This comprehensive scope ensures accountability across all institutional functions and project activities:

- Financial management processes and procedures;
- Procurement operations and contract administration;
- Human resources policies and labor relations;
- Environmental and social safeguards implementation;
- Project design, implementation and monitoring;
- Stakeholder engagement and consultation processes;
- Institutional governance and organizational conduct.

### 1.2 Importance

As a government institution under the Committee for Environmental Protection under the Government of the Republic of Tajikistan, CIIP is committed to upholding the principles of good governance, legality and citizen participation as established in national constitutional and legal frameworks. The establishment of a robust GRM serves multiple institutional and operational objectives.

The mechanism contributes to strengthening public trust in CIIP and its mandate, promoting early and peaceful resolution of disputes while reducing risks of conflict escalation. It enhances transparency and responsiveness in project management and institutional performance while meeting environmental, social, gender and fiduciary accountability requirements of international development partners including the Adaptation Fund and other climate finance institutions. The GRM fosters a culture of continuous learning and institutional integrity essential for effective development implementation.

## 2. Legal and Regulatory Framework

### 2.1 National Legislation

The organization operates within the legal framework of the Republic of Tajikistan and ensures full compliance with applicable national laws and regulations. The GRM is developed and implemented in accordance with established legal requirements governing public institutions and citizen engagement.

Key national legal instruments provide the foundation for grievance redress procedures:

- The Law on Appeals of Individuals and Legal Entities establishes the fundamental right of individuals to submit complaints and appeals to public authorities and outlines procedural requirements for registration, review and response.
- The Law on Environmental Protection mandates public access to environmental information and participation in environmental decision-making processes.
- The Labor Code provides the legal foundation for addressing employment-related grievances including workplace rights, equality and conflict resolution mechanisms.
- The Law on Transparency and Access to Information ensures the right to access public information and reinforces transparency requirements.

The organization ensures that institutional responses to grievances are coordinated with relevant government authorities where legally required and that all procedures comply with applicable national legislation.

## 2.2 International Development Finance Institution Requirements

The GRM complies with safeguard and operational policies applicable to externally supported projects. These requirements establish minimum standards for grievance mechanisms that serve project-affected populations and ensure institutional accountability.

Compliance requirements address key operational standards:

- Grievances shall be addressed in a timely, impartial and transparent manner consistent with international best practices.
- All individuals including vulnerable and marginalized groups shall have equal access to the grievance mechanism.
- Confidentiality and protection of complainants shall be maintained throughout the process.
- Records of complaints and resolutions shall be systematically maintained and reviewed according to established protocols.

## 2.3 International Best Practices

The design and implementation of the GRM follow globally recognized standards and principles for grievance handling. These standards ensure that the mechanism meets contemporary expectations for institutional accountability and stakeholder engagement.

International best practices inform the mechanism's operational framework through several key principles. The GRM ensures access to effective remedy, protection from retaliation and fairness throughout the resolution process. Complaints procedures are structured in line with quality management principles and user-focused processes that prioritize complainant needs and satisfaction. The mechanism promotes continuous improvement through systematic feedback collection and regular review processes.

The GRM also ensures compliance with international development finance institution requirements including environmental and social safeguard policies that mandate accessible grievance mechanisms for addressing complaints about environmental or social harms caused by supported projects.

### 3. Key Principles and Objectives of the GRM

The Grievance Redress Mechanism operates based on core principles that ensure credibility, fairness and effectiveness. These principles guide all aspects of grievance handling from initial complaint receipt through final resolution and follow-up activities.

The mechanism's operational principles establish the foundation for consistent and effective grievance resolution:

- **Accessibility:** The GRM provides multiple channels for complaint submission including online platforms, telephone hotlines, email correspondence and in-person visits to designated offices to accommodate diverse stakeholder needs and circumstances.
- **Confidentiality:** Strict confidentiality is maintained throughout the grievance process with particular attention to protecting the identity and privacy of complainants in cases involving sensitive issues or whistleblower disclosures.
- **Impartiality:** The GRM functions independently and objectively ensuring that all complaints receive fair review without prejudice or conflict of interest and that resolutions are based on factual analysis and documented procedures.
- **Timeliness:** Complaints are addressed within established timeframes with clear communication to complainants regarding process steps and expected duration for resolution.
- **Accountability:** All grievances are tracked through a structured system that monitors resolution outcomes and produces regular reports to ensure documentation and resolution in a responsible and consistent manner.
- **Transparency:** The grievance process maintains transparency and clear communication regarding mechanism operations, decision-making processes and available remedies while preserving confidentiality where required.

### 4. Structure of the GRM

The Grievance Redress Mechanism follows a structured and institutionalized approach to ensure effective grievance handling. The organizational structure provides clear roles and responsibilities while maintaining appropriate independence and technical capacity for fair and effective complaint resolution.

#### 4.1 Designated GRM Officer or Team

CIIP appoints a dedicated GRM Officer or establishes a specialized team responsible for managing the entire grievance process. This function includes receiving, logging, assessing, tracking and resolving complaints according to established procedures and timeframes.

The GRM function operates with sufficient authority, neutrality and technical capacity to ensure fairness and effectiveness. The Officer or team maintains independence from operational departments while coordinating closely with relevant technical specialists to ensure comprehensive complaint assessment and resolution.

## 4.2 Complainant Liaison

A designated focal point manages communication with complainants throughout the grievance process. The liaison officer ensures that complainants receive timely information at every process step including acknowledgment of receipt, investigation progress updates and resolution outcomes.

The liaison receives specialized training in active listening, empathy and conflict-sensitive communication to support respectful and effective engagement with complainants. This role is essential for maintaining complainant confidence in the process and ensuring clear communication regarding expectations and outcomes.

## 4.3 Resolution Team

A resolution team includes representatives from relevant departments such as legal, finance, environmental safeguards and human resources. This multidisciplinary approach ensures that complaints receive appropriate technical review and that proposed corrective actions address the specific nature of each case.

The resolution team operates according to internal procedures and applicable national regulations while maintaining coordination with the GRM Officer to ensure consistent application of grievance handling principles and standards.

## 4.4 Independent Oversight

In complex or unresolved cases, CIIP may refer matters to independent oversight bodies including government ombudsman offices, mediation councils or sector regulators. This escalation mechanism ensures impartial review and reinforces the integrity of the grievance process when internal resolution proves insufficient.

## 5. Grievance Redress Process

The CIIP organizational GRM serves as an institutional safeguard to address complaints that extend beyond individual project boundaries or that cannot be resolved through project-level mechanisms. The process ensures transparency, accountability and recourse in all CIIP operations while overseeing systemic improvements across projects.

This mechanism operates as distinct from and complementary to project-level GRMs. While each project maintains its own GRM in accordance with donor and regulatory requirements, complaints unresolved at the project level or involving broader institutional concerns are escalated to this organizational-level mechanism.

### **a) Step 1: Complaint Submission**

Complaints may be submitted through various accessible channels to accommodate diverse stakeholder needs and circumstances. CIIP maintains centralized online portals, official email addresses, dedicated telephone hotlines and in-person submission capabilities at headquarters and regional offices. These channels are publicized and made available to all stakeholders through multiple communication methods.

The organizational-level GRM handles specific categories of complaints that require institutional-level attention and response:

- Complaints escalated from project-level GRMs due to dissatisfaction with resolution or non-resolution of issues
- Allegations involving CIIP's institutional policies, systems or personnel that affect organizational operations
- Complex or cross-cutting issues affecting multiple projects or stakeholder groups
- Environmental or social harms caused by supported projects or programmes
- Systemic grievances requiring higher-level independence, confidentiality or oversight

Complainants should provide relevant information to facilitate effective complaint processing. This includes complainant name and contact details where possible, detailed description of the grievance nature and context, documentation of prior resolution attempts where applicable and any supporting documents or evidence that substantiate the complaint.

#### **b) Step 2: Acknowledgement and Initial Assessment**

The GRM Officer at CIIP confirms receipt of complaints within 48 hours of submission. Acknowledgment communications include brief explanations of review steps and anticipated timelines for resolution to ensure complainants understand the process and expected outcomes.

Initial assessment occurs within 5 working days of complaint receipt. The GRM Officer determines whether complaints fall within the scope of the organizational-level GRM, assesses whether issues were appropriately handled at project level or require escalation and evaluates the level of urgency and potential reputational, operational or legal risk. This assessment also identifies whether specialized internal units such as legal or internal audit should be involved in complaint resolution.

#### **c) Step 3: Environmental and Social Risk Assessment**

Complaints involving potential environmental or social harms require enhanced assessment procedures to ensure appropriate response and compliance with safeguard requirements. The GRM Officer coordinates with relevant specialists to ensure comprehensive evaluation of environmental and social implications.

The environmental and social risk assessment includes specific evaluation criteria:

- Assessment of whether complaints relate to violations of environmental and social safeguards as established in organizational policies
- Determination of whether complaints involve significant adverse impacts on environment, affected communities or project personnel
- Coordination with relevant environmental and social specialists to ensure technical expertise in complaint evaluation
- Application of expedited procedures for complaints involving serious harm, risk or rights violations

#### **d) Step 4: Investigation and Resolution**

The CIIP GRM Team conducts thorough and impartial investigations in coordination with relevant departments including finance, environment, procurement and other technical specialists. Investigations involving previously handled project-level grievances include review of prior documentation to assess procedural adequacy and fairness of previous resolution attempts.

Formal resolutions or institutional action plans are developed within 15 working days of investigation completion. Where additional time is required due to complaint complexity, complainants receive written notification with updated timelines and explanations for delays.

Alternative Dispute Resolution options may be offered in cases of unresolved conflict or stakeholder disagreement. These options include facilitated dialogue, mediation or arbitration and are particularly encouraged when legal or contractual issues have not yet escalated to litigation.

#### **e) Step 5: Outcome Communication**

CIIP communicates resolution outcomes to complainants in clear and respectful manner. Outcome notifications include investigation findings, actions taken or rationale for decisions not to take action and information regarding available channels for appeal or further escalation including national ombudsman offices, donor grievance channels or judicial recourse.

#### **f) Step 6: Monitoring and Follow-Up**

The GRM Officer monitors implementation of agreed actions and follows up with both complainants and responsible departments. This monitoring ensures that resolutions are properly implemented and identifies any recurrence of issues or institutional weaknesses that require additional attention.

Complainants are encouraged to provide confidential feedback on the grievance process to help enhance mechanism performance and responsiveness. This feedback contributes to continuous improvement efforts and helps identify areas where procedural or operational enhancements may be beneficial.

#### **g) Step 7: Reporting and Record Keeping**

All complaints, investigations, findings and outcomes are recorded in secure databases with appropriate protection for sensitive information. Access to complaint records is restricted to authorized personnel and data protection principles are applied throughout the documentation process.

The GRM team produces quarterly and annual summaries that are aggregated and anonymized for senior management and oversight bodies. These reports highlight complaint numbers and types, average resolution times, systemic issues identified and addressed and lessons learned with recommendations for policy changes.

Complainants may also submit complaints directly to international funding agencies through established channels. Information about alternative complaint mechanisms including direct submission to funding agency secretariats shall be provided to complainants as part of the acknowledgment process. Such alternative channels work alongside but do not replace this institutional grievance mechanism.

## **6. Handling Different Types of Grievances**

CIIP recognizes that grievances may originate from diverse sources and involve various subject matters. To ensure fairness, responsiveness and legal compliance, the organizational-level GRM categorizes



grievances and applies appropriate resolution pathways based on their type and severity. Coordination with relevant departments is essential to address grievances effectively and uphold the rights of all stakeholders.

### 6.1 Employee-Related Complaints

Employee-related complaints are submitted by personnel including staff, consultants and interns. These complaints typically address working conditions and health and safety concerns, alleged violations of employment contracts or labor rights and workplace discrimination, harassment or abuse of authority.

The resolution approach for employee-related complaints shall follow established procedures:

- Complaints shall be referred to the Human Resources Department for investigation in coordination with the GRM Officer.
- Investigation and resolution shall be conducted according to internal HR procedures, grievance and disciplinary policies and the Labor Code of the Republic of Tajikistan.
- Confidentiality, fairness and protection from retaliation shall be guaranteed for all complainants.

### 6.2 Stakeholder Complaints

Stakeholder complaints originate from external parties including project beneficiaries or affected communities, local civil society groups and contractors, suppliers or implementation partners. These complaints commonly involve concerns over environmental and social safeguards, project design or service delivery issues and misuse or misallocation of project resources.

The resolution approach for stakeholder complaints incorporates multiple levels of response:

- Complaints shall be initially addressed through the project-level GRM where applicable.
- Unresolved complaints or those implicating broader institutional conduct shall be escalated to the organizational-level GRM.
- Investigation shall be conducted by relevant technical or oversight teams including safeguards, procurement and finance specialists.

### 6.3 Public Complaints

Public complaints are raised by the general public, watchdog organizations or media representatives. These grievances typically concern allegations of corruption or financial mismanagement, institutional non-compliance with environmental, procurement or disclosure standards and broader transparency and accountability issues.

The resolution approach for public complaints emphasizes institutional oversight and external coordination:

- Complaints shall be reviewed under the oversight of the GRM Officer and referred to senior management or internal audit as necessary.
- Complaints requiring external review shall be referred to national oversight institutions or donor complaint mechanisms where appropriate.

- Substantiated complaints may trigger systemic policy reviews or external investigations.

#### 6.4 Anonymous Complaints

Anonymous complaints are accepted where complainants fear retaliation or loss of livelihood or where the subject matter involves sensitive issues including fraud, harassment or whistleblower reports. The organization recognizes the legitimacy of anonymous complaints while maintaining due process requirements.

The resolution approach for anonymous complaints balances investigation needs with confidentiality protection:

- Complaints shall be assessed for credibility based on specificity, evidence and seriousness of claims.
- Investigation shall proceed to the extent possible without compromising due process.
- Substantiated complaints shall result in appropriate corrective action and system-wide improvements.
- Strict confidentiality shall be maintained throughout the process with non-retaliation protections applied according to internal policies.

#### 6.5 Environmental and Social Safeguards Violations

Complaints alleging violations of environmental and social safeguards require specialized handling procedures. These complaints shall be addressed in accordance with CIIP's Environmental and Social Policy and related compliance frameworks as outlined in the organization's comprehensive safeguards system.

The enhanced resolution approach for safeguards violations includes specific procedural requirements:

- Complaints shall be subject to immediate assessment by CIIP's Environmental and Social Safeguards Officer.
- Investigation shall integrate with environmental and social monitoring requirements established in CIIP's Environmental and Social Policy.
- Resolution may require engagement of independent experts as provided in CIIP's compliance framework.
- Remedial actions shall align with the mitigation hierarchy and compliance mechanisms specified in CIIP's Environmental and Social Policy.

### 7. Stakeholder Engagement and Awareness

A transparent, trusted and inclusive Grievance Redress Mechanism depends on meaningful engagement of all stakeholders. CIIP is committed to promoting awareness of the organizational-level GRM especially among those most likely to be affected by its operations. This commitment includes proactive outreach, inclusive design and capacity building to ensure that the mechanism is known, accessible and understood by all relevant stakeholders.

## 7.1 Stakeholder Communication

CIIP implements ongoing communication strategies to raise awareness of the GRM, its purpose and the rights of stakeholders to file grievances. These strategies ensure that information about the grievance mechanism reaches all relevant audiences through appropriate channels and formats.

Communication approaches utilize multiple channels and formats to maximize reach and accessibility:

- Information dissemination through brochures, posters at project and office locations and digital materials on CIIP websites and social media platforms;
- Direct engagement through stakeholder meetings, community consultations and partnership discussions;
- Integration of GRM information into broader stakeholder engagement activities and project communications;
- Distribution of materials in accessible formats and local languages to ensure clarity and comprehension across diverse stakeholder groups.

## 7.2 Inclusive Access

CIIP makes deliberate efforts to ensure that the GRM is accessible to all stakeholders with particular attention to marginalized or vulnerable groups. This includes individuals in remote or rural areas, persons with disabilities and women, youth and minority groups who may face additional barriers to accessing grievance mechanisms.

Accessibility measures address diverse needs and circumstances:

- Multiple channels for grievance submission including mobile communication, verbal reporting and SMS-based systems;
- Physical access points established in community centers, local government offices and other accessible locations;
- Training for liaison personnel to provide support for individuals with literacy challenges or mobility limitations;
- Culturally appropriate communication methods and materials that respect local customs and languages.

## 7.3 Training

CIIP provides targeted training sessions to ensure that staff and stakeholders understand the purpose and procedures of the GRM. Training programs address different audiences and their specific roles in the grievance process.

Internal training covers essential elements for effective implementation:

- Roles and responsibilities of staff involved in GRM handling and complaint resolution;
- Principles of fairness, non-retaliation and confidentiality that guide all grievance activities;
- Techniques for conflict-sensitive communication and trauma-informed response approaches;

- Integration of GRM procedures with other organizational policies and operational requirements.

External stakeholder training addresses practical aspects of mechanism access and use:

- Procedures for submitting grievances through various available channels;
- Expectations regarding process steps, timelines and resolution approaches;
- Rights to appeal decisions or escalate unresolved concerns to higher authorities;
- Protection measures available to prevent retaliation against complainants.

Training effectiveness is regularly evaluated to ensure that all stakeholders regardless of gender, ability or geographic location have meaningful access to grievance redress at the organizational level.

## 8. Monitoring, Evaluation and Reporting

CIIP recognizes that an effective Grievance Redress Mechanism requires regular monitoring and assessment to ensure continued functionality, credibility and responsiveness. Systematic tracking and transparent reporting enable continuous learning and foster institutional accountability while providing stakeholders with information about mechanism performance and effectiveness.

### 8.1 Performance Metrics

CIIP defines Key Performance Indicators to monitor organizational-level GRM performance. These indicators provide quantitative and qualitative measures of mechanism effectiveness and stakeholder satisfaction with grievance resolution processes.

Performance measurement addresses multiple dimensions of GRM effectiveness:

- Number of complaints received with disaggregation by type, origin and complainant characteristics;
- Average time taken to acknowledge complaints and complete resolution processes;
- Rate of grievances resolved within defined timeframes and organizational targets;
- Number of escalated complaints and recurrent issues requiring repeated attention;
- Complainant satisfaction with GRM processes, outcomes and overall mechanism performance.

These metrics shall be reported to funding agencies as required by project agreements and institutional accountability requirements.

### 8.2 Annual Reports

CIIP compiles and publishes annual GRM performance reports that provide comprehensive information about mechanism operations and outcomes. These reports serve both internal management needs and external transparency requirements.

Annual reporting includes comprehensive analysis and assessment:

- Quantitative data on grievances received with categorization by theme, severity and resolution outcomes;

- Summary of resolution rates, timelines and efficiency measures compared to established targets;
- Analysis of trends, recurring issues and grievance patterns that may indicate systemic problems;
- Lessons learned from complaint resolution and recommendations for system-level improvements;
- Assessment of stakeholder engagement effectiveness and mechanism accessibility for different groups.

Reports are shared internally with CIIP senior management and oversight bodies and made publicly accessible through CIIP websites and annual publications to promote transparency and public trust in institutional accountability mechanisms.

### 8.3 Evaluation

CIIP conducts periodic internal and external evaluations of the GRM to assess operational effectiveness and identify opportunities for improvement. These evaluations provide systematic assessment of mechanism performance against established standards and stakeholder expectations.

Evaluation activities address multiple aspects of mechanism performance:

- Operational efficiency including staff capacity, resource allocation and procedural effectiveness;
- Accessibility and inclusiveness with particular attention to vulnerable and marginalized groups;
- Responsiveness to different types of grievances and complexity of issues addressed;
- Alignment with national legal frameworks, international best practices and donor requirements;
- Integration with other organizational policies and procedures including environmental and social safeguards.

Evaluation findings inform policy reforms, capacity-building plans and procedural improvements to enhance mechanism effectiveness and stakeholder satisfaction with grievance resolution processes.

## 9. Continuous Improvement

CIIP is committed to fostering a culture of learning and accountability by using the GRM as both a problem-solving tool and a driver of organizational learning and innovation. This commitment ensures that the mechanism evolves to meet changing needs and circumstances while maintaining effectiveness and stakeholder confidence.

### 9.1 Feedback Collection

CIIP establishes formal and informal mechanisms to gather feedback on GRM processes from multiple sources. This feedback provides essential information for identifying strengths, weaknesses and opportunities for improvement in mechanism design and implementation.

Feedback collection addresses multiple stakeholder perspectives:

- Complainants and affected parties provide direct experience with mechanism accessibility, fairness and effectiveness

- Internal GRM personnel and investigators contribute operational insights and procedural recommendations
- Project teams and external stakeholders offer broader perspectives on mechanism integration and institutional effectiveness
- Oversight bodies and partner organizations provide comparative analysis and best practice recommendations

This feedback informs adjustments to procedures, tools and communication strategies to enhance mechanism responsiveness and effectiveness.

## 9.2 Process Refinement

GRM procedures are reviewed at least annually or more frequently as needed to reflect changing circumstances and emerging needs. These reviews ensure that the mechanism remains current, relevant and effective in addressing stakeholder concerns and institutional accountability requirements.

Review processes address multiple factors that may affect mechanism effectiveness:

- Changes in institutional structure, legal environment or operational requirements that affect grievance handling;
- New insights from evaluations, stakeholder feedback and comparative analysis with other mechanisms;
- Evolving risks, operational needs and stakeholder expectations that require procedural adaptations;
- Integration requirements with updated organizational policies, donor requirements and national legislation.

Updates are communicated clearly to all stakeholders and integrated into staff training and capacity-building programs to ensure effective implementation of revised procedures.

## 9.3 Learning from Complaints

CIIP systematically analyzes grievance data to identify systemic issues and patterns that may indicate broader institutional challenges requiring proactive attention. This analysis contributes to organizational learning and strategic planning processes.

Systematic analysis addresses multiple dimensions of institutional performance:

- Identification of weaknesses in project design, implementation or monitoring that generate recurrent complaints;
- Assessment of gaps in stakeholder engagement, consultation or communication that affect project acceptance;
- Recognition of institutional risks that require proactive mitigation through policy or procedural changes;

- Evaluation of capacity-building needs for staff, partners or stakeholders to prevent future grievances.

These insights are integrated into CIIP's broader organizational planning, policy development and risk management strategies to enhance institutional effectiveness and reduce the likelihood of future grievances requiring formal resolution through the GRM.