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Republic of Serbia

Ministry of Finance

Kneza Miloša 20, 11000 Belgrade

**“IMPROVING PUBLIC FINANCIAL MANAGEMENT FOR THE GREEN TRANSITION” OPERATION**

**GRIEVANCE MECHANISM**

This document is published in Serbian and English on the website of the Ministry of Finance <https://www.mfin.gov.rs/dokumenti2/operacija-unapreenje-upravljanja-javnim-finansijama-za-zelenu-tranziciju> .

The document describes the Grievance Mechanism of the “Improving public financial management for the green transition” Operation, which has been established and is already functioning, to be used for all questions or comments concerning the Operation itself. The document also describes the process of establishing a centralised grievance system, and notifications on the handling of grievances include simple instructions for all stakeholders on the ways to submit a grievance.

September 2023

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# Introduction

The Government of the Republic of Serbia is realizing the “Improving public financial management for the green transition” Operation with financial support of the International Bank for Reconstruction and Development of the World Bank Group (hereinafter: IBRD) and the French Development Agency (hereinafter: AFD). Within the Department for International Cooperation and European Integration of the Ministry of Finance of the Republic of Serbia, is the Operation Coordination Unit, which is in charge of managing the Operation.

The “Improving public financial management for the green transition” Operation is a four-year Operation supported by the IBRD and AFD for the purpose of providing support to the Government of the Republic of Serbia in further improvement of public financial management and direction towards green transition.

The Operation consists of two components: Program-for-Results (hereinafter: Program) and Technical Assistance (hereinafter: Project). The Program includes parts on strengthening fiscal resilience, transparency, power usage effectiveness, greening of the expenditure cycle, monitoring and reporting on greenhouse gas emissions, while the Project concerns technical assistance allocations for the purpose of providing support to implementation bodies in achieving the expected results. Implementation bodies for the implementation of the Operations were, in addition to the Ministry of Finance, the Ministry of Environmental Protection, Republic Directorate for the Property of the Republic of Serbia, Public Procurement Office, the Public Policy Secretariat and the Ministry of Construction, Transport and Infrastructure.

The Operation will be implemented in accordance with the World Bank’s policies and standards concerning environmental protection and the protection of the social environment. One of the requests defined in the Environmental and Social Standard 10 of the World Bank[[1]](#footnote-1) and addressed in this document is the establishment and implementation of the Grievance Mechanism of the Operation.

# Purpose of the Grievance Mechanism

The purpose of defining and implementing the Grievance Mechanism of the Operation is, with other forms of cooperation with stakeholders, three-fold:

* An independent grievance mechanism has been established for the purposes of this program. It is financed by the World Bank and used to resolve any uncertainties or dissatisfaction with respect to the Operation. This mechanism enables individuals, communities and organisations to file an appeal/request for additional information if they believe that their rights are threatened or that they have suffered damage due to an activity directly linked to the Operation;
* to prevent or handle any negative impact on the environment and local communities that the Operation is familiar with due to submitted individual grievances, and
* to enable an analysis of received complaints with a view to directing future activities for the implementation of the Operation and cooperation with stakeholders, in order to achieve better overall results.

The Grievance Mechanism handles complaints by external stakeholders connected to the Operation (individuals, groups or organisations) mentioned further below as complainants. It is not meant to be used by employees, members of the project team, workers etc. connected to the Operation, who are considered internal stakeholders, and for whom a special internal grievance mechanism has been established, in accordance with the laws and regulations of the Republic of Serbia.

Communities and individuals who believe that they have been aggrieved as a result of the operations of the Bank-supported Program-for-Results, as defined in the applicable policy and procedures, may submit their grievances to the existing grievance mechanism or the World Bank’s Grievance Redress Service (GRS). GRS ensures that the received grievances are immediately reviewed, in order to respond to the relevant problems. Affected communities and individuals may submit their grievance to an independent inspection panel of the World Bank, which determines if any damage has occurred or might occur as a result of violations of policies and procedures of the World Bank. Grievances may be submitted at any time after the World Bank has been directly made aware of the problems, and after the Bank's management has been given an opportunity to respond. Information on the manner of submission of grievances to the corporate GRS of the World Bank [http://www.worldbank.org/GRS](https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.worldbank.org%2FGRS&data=05%7C01%7Cmagdalena.arsic%40mfin.gov.rs%7Cb5b3227c3f0440e0f2d208dbb86268fa%7Ce9869d9e5f16415689b0d51630ff7000%7C1%7C0%7C638306505039339439%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=q9YPIxuWLENaBXhUXLK8CW9OZQpnD1atYkdNUGzkx8U%3D&reserved=0) . Information on the manner of submission of grievances to the corporate GRS of the World Bank is available at [http://www.worldbank.org/GRS](https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.inspectionpanel.org%2F&data=05%7C01%7Cmagdalena.arsic%40mfin.gov.rs%7Cb5b3227c3f0440e0f2d208dbb86268fa%7Ce9869d9e5f16415689b0d51630ff7000%7C1%7C0%7C638306505039339439%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=OCVwNPvAI3QBZQzppBHw6blYiuVbt3Bnk%2Fz%2Bzruf38U%3D&reserved=0) .

# Principles of the Grievance Mechanism

The Grievance Mechanism helps improve transparency and accountability during the implementation of the program. By establishing the Grievance Mechanism of the Operation, certain key principles to be observed in the process of complaint resolution have been defined, namely:

1. Accessibility

The Grievance Mechanism is accessible to any individual, group or organisation affected by or interested in the Operation, and its use is free of charge. Information on the Grievance Mechanism is available in Serbian/English and displayed at the appropriate place, described further in the document.

Advice and assistance in the submission of grievances will be provided in writing within the framework of the Grievance Mechanism on the website of the Ministry of Finance, whose responsible persons also assist in explaining the responses to the complainant, as appropriate. Grievances may be submitted in writing or orally, through different channels, including by post, e-mail, telephone or in person, whichever the complainant prefers. Vulnerable persons who may have difficulties submitting a grievance must be provided with all the necessary help in this process.

1. Transparency

The Grievance Mechanism describes the full procedure of handling a complaint, i.e. all internal steps undertaken for it to be considered and resolved, as well as who the persons included in the decision-making process are. It provides a clear overview of what the complainant can expect in the process of resolving a grievance.

1. Time frame

The procedure of the Grievance Mechanism is defined in a manner that enables individuals, groups or organisations to quickly come into contact with the responsibly person for the Operation in order to resolve all urgent problems concerning the Operation. This procedure also entails time frames for certain activities undertaken within the framework of the Operation, including giving answers within a certain time frame.

1. Respecting privacy and not using repression

Anyone who submits a complaint is guaranteed that no repression will be used against them for that reason. In addition, complaints may be submitted anonymously, in which case the answer will be posted publicly. Personal details of the complainant are never published nor shared with anyone other than the persons included in the processing of complaints and implementation of corrective measures, only when necessary and with an approval of the complainant.

1. Acting in good faith

The Grievance Mechanism is designed in such a manner as to promote interaction with the Operation and its stakeholders, to identify, through dialogue, the best solution for each complaint, which would be acceptable for all participants. The Grievance Mechanism is a voluntary process and does not prevent complainants from undertaking legal action in accordance with the laws of the Republic of Serbia, nor does it affect judicial proceedings and outcomes in any way.

# Organisation of the Grievance Mechanism

The centralised system of the Grievance Mechanism will be established within the Operation Coordination Unit for the purpose of collecting and managing all complaints concerning the project. This activity will be complemented by government institutions which participate in the implementation of the Operation. The Operation Coordination Unit will establish a clear and transparent internal process for complaints resolution. This process will involve certain staff members responsible for receiving, documenting and resolution of complaints.

All other departments involved in the implementation of the Operation - the Public Policy Secretariat of the Republic of Serbia, the Ministry of Environmental Protection, the Ministry of Construction, Transport and Infrastructure, the Republic Directorate for the Property and the Public Procurement Office - will post to their websites an instruction and a notification about accessing the Grievance Mechanism with respect to the said Operation, as well as a link to the centralised page of the Ministry of Finance/Grievance Mechanism, where each stakeholder can find information on the manner of handling a grievance.

## Contractor’s Complaint Desk

It is important to note that, if the Operation involves any construction works at the local level, the selected Contractor is also obliged to take part in the Grievance Mechanism by establishing the Contractor’s Complaint Desk. This is because certain complaints directly concern construction works executed on site, which are within the sole purview of the Contractor. This means that each selected Contractor is obliged to appoint at least one employee who will be in charge of receiving and handling complaints. The Contractor is obliged to notify the Operation of all received complaints and the manner in which they are being handled. There are also situations in which Contractors and the Operation Coordination Unit must jointly resolve complaints.

When the Contractor’s Complaint Desk has been established, which must be done before any on-site activities are to begin, the contact details of the person in charge of this Desk (Contractor’s Grievance Manager shall be published together with the contact details of the local Grievance Manager, as well as at the site where the construction works are being executed (e.g. at the opening gate of the construction site or at the construction advertisement board).

## Centralised grievance system

For the “Improving public financial management for the green transition” Operation, a centralised grievance mechanism system has been established, which functions at the level of the entire Operation, in order to ensure that complaints or requests for information are handled at all levels of implementation and with respect to all departments in charge of the implementation.

The centralised grievance mechanism system is managed by a member of the Operation Coordination Unit, referred to as the Grievance Manager, who directly answers to the manager of the Operation Coordination Unit, who is responsible for the implementation as a whole. The Grievance Manager is in charge of collecting all complaints (resolved or unresolved) from local complaint desks and the Contractor’s Complaint Desk, and their entering into a single register. The Grievance Manager is also in charge of providing support to all desks in their discharge of their duties and of monitoring their activities. The Grievance Manager also manages the process of complaint handling, regardless of whether such complaints have been submitted directly to the central desk or have remained unresolved by the local contractor’s complaint desk, in collaboration with all relevant departments and divisions, and supports the activities of the Second-instance Committee, which makes decisions on grievances in a procedure of second instance.

For any questions or comments concerning the Operation, the contact details of the Grievance Manager are:

Ministry of Finance, Department for International Cooperation and European Integration

Operation Coordination Unit of the Ministry of Finance

Grievance Manager: Magdalena Arsić

Title: Independent Advisor

Address: Kneza Miloša 20, 11000 Belgrade, of Serbia

e-mail: zalbe.pfmgt@mfin.gov.rs

Telephone: +381 11 765 2199 (Working days from 10 a.m. to 1 p.m.)

# Grievance handling

A grievance is defined as any real or perceived concern or complaint put forward by an individual, group or organisation (complainant) with respect to the Operation. The Grievance Mechanism is designed in such a manner that it responds to complaints, as well as to all specific requests for information on the Operation, which may not be publicly available yet.

## Steps in grievance handling

In order to efficiently handle a complaint or a request for information, the Operation undertakes a series of steps described below.

**STEP 1:** **Receipt. registration and confirmation of the receipt of complaints**

The Grievance Manager receives a request for information or a complaint (in person, by telephone, by post or e-mail) and enters it into the grievance register, assigning it a specific reference number. The Grievance Manager confirms the receipt of a grievance within seven working days, by contacting the complainant in a manner of her own choosing. The confirmation includes the reference number of the complaint and the date of receipt. Some requests for information are easily and immediately resolved and do not require any confirmation, but are also entered into the grievance register.

Confirmations of receipt are not issued for anonymous grievances received by e-mail or post, by persons who have not submitted their personal and contact details. Nevertheless, information that such a complaint has been received and the manner of its handling is posted on the website of the Operation.

**STEP 2: Investigation and resolution of complaints**

In this phase, an investigation is launched with respect to the complaint. The complainant may be additionally contacted during this phase in order to provide further information, explain any new circumstances and helped identify possible solutions which would be acceptable to all parties.

The Grievance Manager, acting with the approval of the manager of the Operation Coordination Unit, determines which division or person has the responsibility to review and resolve the grievance, investigate facts and circumstances, suggest corrective measures and compile and answer for the complainant. If, after the initial investigation, it is found that the complaint does not refer to the Operations, the procedure is terminated, and the complainant is notified thereof.

The Operation is sometimes unable to respond to anonymous complaints, which is clearly indicated in the notifications and the Grievance Mechanism. Nevertheless, the Operation does everything in its power to respond to such complaints, and the answer is always posted on the website of the Operation.

**STEP 3:** **Answer to the complainant**

The grievance is resolved and the answer given within **30 days from the receipt of the grievance.** The answer contains a clear assessment of the complaint/request, a description of the requested information, and a proposal for corrective action, if needed. A corrective action may include mitigating measures for any situation arising from the activities of the Operation, and/or compensation measures, if mitigation is not possible, with a clear time frame when the measures will be implemented.

If the complaint desk is unable to transmit the answer within 30 days, the complainant is notified thereof, as well as of the new time frame for the answer, in a timely manner. The total time for answer **may not be longer than 60 days from the receipt of the grievance,** although the time period needed to implement corrective measures may need to be longer, depending on the nature of the complaint.

Answers to anonymous complaints are available on the website of the Operation. The address of the website of the Operation is published in all the notifications on the Grievance Mechanism.

**STEP 4: Grievance closure**

If the complainant is satisfied with the answer received from the complaint desk, the grievance is closed. For all complex complaints and such complaints which require additional action, the Grievance Manager will request the complainant to submit a signed confirmation that the grievance has been adequately resolved and that it is considered closed.

## Grievances submitted by telephone

When complaints are submitted by telephone, grievance managers record the details of the calls in the grievance register: the date when the call was received, the nature of the conversation and all other relevant facts. The Grievance Manager always tries to agree with the complainant on the manner in which the written answer to the grievance will be submitted to them (by e-mail or by post), which will also serve as a confirmation of the implemented procedure and solution. If this is not possible, a record of the telephone conversation, made by the Grievance Manager and entered into the register, serves as the confirmation.

# Contact details of the local Grievance Managers and the Contractor’s Grievance Managers

The table below is regularly updated in this document by the Grievance Manager when the relevant data become available.

|  |  |
| --- | --- |
| **Operation Component** | **Contact details of the Contractor’s Grievance Managers** |
|  |  |

# Submission of grievances

Anyone who has any questions or grievances concerning the “Improving public financial management for the green transition” Operation should fill out the form provided as ANNEX 1 to this document, or use it as a guideline to prepare their submission. A complaint or question may be submitted by post or e-mail, using the following contact details:

Ministry of Finance, Department for International Cooperation and European Integration

Operation Coordination Unit

Grievance Manager: Magdalena Arsić

Title: Independent Advisor

Address: Kneza Miloša 20, 11000 Belgrade, of Serbia

e-mail: [zalbe.pfmgt@mfin.gov.rs](mailto:zalbe.pfmgt@mfin.gov.rs)

Telephone: +381 11 765 2199 (Working days from 10 a.m. to 1 p.m.)

# Annex 1 – Complaint form

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **MINISTRY OF FINANCE**  “Improving public financial management for the green transition” Operation  For all your questions, comments or complaints concerning the “Improving public financial management for the green transition” Operation, please contact the Grievance Manager, Magdalena Arsić, Independent Advisor in the Department for International Cooperation and European Integration of the Ministry of Finance, Operation Coordination Unit, by:  **Ministry of Finance, Department for International Cooperation and European Integration**  **Operation Coordination Unit**  Grievance Manager: Magdalena Arsić  Address: Kneza Miloša 20, 11000 Belgrade, of Serbia  e-mail: [zalbe.pfmgt@mfin.gov.rs](mailto:zalbe.pfmgt@mfin.gov.rs)  Telephone: +381 11 765 2199 (Working days from 10 a.m. to 1 p.m.)  Please note that we are only able to answer such questions or comments which directly concern this Operation, and not such questions which concern general activities of the Ministry of Finance or other institutions covered by the Operation.   |  | | --- | | **Reference number** (*do not fill out; the number will be allocated by the responsible party:* | | **Section 1 - Contact information (not mandatory):**  *Note: if you wish, you may remain anonymous. In the case of anonymous submissions, the answer will be posted on the website of the Operation.*  ❏ I wish to submit a complaint anonymously | | *Note: Your name and contact information will not be published not publicly available. The information will be used only for further communication with you concerning the question, comment or complaint you have submitted. Information about gender will be used only for statistical purposes, data processing and an analytical overview; by declaring your gender, you are giving your approval for your information to be processed as statistical data.*  Name:  Surname:  Gender (optional field): ❏ Man ❏ Woman ❏ Other  **Contact information:**  Address:  e-mail:  Telephone:  Please check how you would like to be contacted: ❏ Post ❏ Telephone ❏ е-mail  ❏ I will look for the answer on the website because I wish to remain anonymous.  Preferred language of communication: ❏ Serbian ❏ English | | **Section 2 – Question, comment or complaint (mandatory field):**  *Note: In the case that your question, comment or complaint is linked to a certain event or incident, please briefly describe: What happened? Where did it happen? To whom did it happen? What was the result of the event/incident? When did the event/incident occur? (Date of the event/incident) Has this happened multiple times (in which period)? Is it still happening?*  **How would you like the problem to be solved?** | |

1. Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure (ESS10), which is a part of the World Bank Environmental and Social Framework (2016) is available at: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards> [↑](#footnote-ref-1)