



Republika e Kosovës
Republika Kosova - Republic of Kosovo
Qeveria - Vlada - Government

Ministria e Financave, Punës dhe Transfereve
Ministarstvo Finansija, Rada i Transfera – Ministry of Finance, Labour and Transfers

STAKEHOLDER ENGAGEMENT PLAN

(INCLUDING CONSULTATION ENGAGEMENT PLAN
AND
GRIEVANCE REDRESS MECHANISM FRAMEWORK)

March, 2025

1. Introduction/Project Description

The Kosovo Social Assistance Reform Project (SAS Project) aims to improve the effectiveness of Kosovo's social safety net by enhancing the performance of the Social Assistance Scheme (SAS), strengthening social protection delivery systems, and building institutional capacity for sustainable and future-oriented reforms. By addressing key gaps in Kosovo's social protection framework, the project seeks to ensure that vulnerable populations have access to more efficient, transparent, and equitable social assistance services while also creating pathways for economic empowerment.

The SAS Project comprises the following components:

1. *Strengthening Social Protection Delivery Systems:* This component involves significant investments in modernizing the Social Registry Management System (SRMS) and the Social Welfare Information System (SWIS). These systems will increase transparency, improve efficiency, and foster inclusiveness in social protection programs by providing better tools for beneficiary identification, eligibility determination, and data management. The component also supports labor market activation of SAS beneficiaries, enabling them to participate in training and employment opportunities, as well as introducing digital payment systems to promote financial inclusion and reduce fraud.
2. *Improving the Performance of the SAS:* The project supports reforms to SAS eligibility criteria, focusing on poverty targeting to ensure assistance reaches the most vulnerable populations. It also includes retroactive financing to mitigate the negative impacts of COVID-19 and transitional measures to ensure a smooth rollout of the new poverty-targeting mechanisms. These steps aim to increase responsiveness and adaptability of the SAS in addressing shocks and improving overall system performance.
3. *Project Management, Capacity Building, Stakeholder Engagement, and Communication Strategy:* This component focuses on strengthening the institutional capacity of the Ministry of Finance, Labor, and Transfers (MFLT) to manage and implement the SAS effectively. It includes measures for stakeholder engagement to promote inclusivity, especially among marginalized groups, and communication strategies to ensure widespread understanding of the reforms.

The project will be implemented across Kosovo, targeting a wide range of vulnerable populations. These include SAS beneficiaries, economically disadvantaged groups, Roma, Ashkali, and Egyptian communities, elderly individuals, persons with disabilities, single-parent households, and others living below the poverty line. The project will ensure these groups are engaged and informed throughout the implementation process.

The SAS Project is being prepared under the World Bank's Environmental and Social Framework (ESF), which emphasizes sustainable and inclusive project design. In line with Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, implementing agencies are committed to providing stakeholders with timely, relevant, understandable, and accessible information. Consultations with stakeholders will be conducted in a culturally appropriate manner, free of manipulation, coercion, discrimination, or intimidation, ensuring that their voices are heard and integrated into the reform process.

For more details, refer to the [Project Information Document \(PID\)](#).

2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

3. Stakeholder identification and analysis

3.1 Methodology

In order to meet best practice approaches, the Project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the Project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation;
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are

provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns;

- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the Project is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, with specific focus on Roma, Ashkali and Egyptian communities, and the cultural sensitivities of diverse ethnic groups.

3.2. Affected parties and other interested parties¹

Affected parties include local communities, community members, and other parties that may be subject to direct impacts, either positive or negative, from the SAS Project. Specifically, the following individuals and groups fall within this category:

- *Currently recipients of the SAS:* Individuals and families receiving financial assistance under the current SAS framework.
- *Persons and families not currently qualifying for SAS:*
 - Families with children who drop out of school or with girls marrying at a minor age;

¹ For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders

- Families with older children (beyond the age of 5) who are excluded due to existing criteria;
 - Persons and families who are losing income and falling into poverty due to the job insecurity or unexpected economic downturn;
 - Persons and families previously benefiting from the Government's Measure 15 implementation;
 - Poor families that do not qualify for other social support programs in the country; and
 - Asylum seekers and refugees who may require additional assistance.
- *Staff of the Centers for Social Work (CSW):*
 - Personnel directly involved in eligibility tracking and servicing current SAS beneficiaries;
 - Staff identifying new beneficiaries without conducting home visits;
 - Administrative staff responsible for benefit databases and social care services; and
 - CSWs staff whose benefit implementation capacity will be enhanced with improved methodologies for precise beneficiary identification.
- *Employment Agency of the Republic of Kosovo (EARK) and Municipal Employment Offices staff:*
 - Personnel directly responsible for supporting labor market activation efforts, implementing other specific programs such wage subsidy, voucher program etc., informing beneficiaries about their obligation or register within Employment Offices, and coordinating with CSWs.
- *Ministry of Finance, Labor, and Transfers (MFLT) staff:*
 - Decision-makers and designers of social assistance programs; and
 - Officials administering SAS and new benefit schemes, including information systems, grievance redress mechanisms, and payment systems.
- *Municipal officials:*
 - Officials at the Directorate for Health and Social Welfare who supervise and support CSWs; and

- Officials at the Directorate for Education who collaborate with CSWs on specific cases.

3.2.1. Other Interested Parties

The Project's stakeholders also include parties other than the directly affected communities, including national and local entities, NGOs, and other civil society groups. These stakeholders include:

- *Extended families of benefit recipients:*
 - Stay-home mothers and caregivers for family members with special needs.
- *Officials from relevant ministries and institutions:*
 - Office of the Medical Committee within the Office of the General Secretary at MFLT;
 - Post offices and banks currently processing SAS payments;
 - Ministry of Education officials developing policies for children in poor families;
 - Ministry of Internal Affairs officials managing civil registration, citizenship, asylum, and migration processes,
 - Ministry of Justice officials involved in state advocacy, correctional centers, and government shelters,
 - Ministry of Agriculture Forestry and Rural Development officials;
 - Office for Good Governance and Human Rights officials within Prime Minister Office, providing support to the Prime Minister and providing advices to Ministries in the filed of vulnerable communities, including Roma, Ashkali and Egyptian Communities; and
 - The Interinstitutional Team of the Government of Kosovo for encouraging and promoting employment for the Roma, Ashkali, and Egyptian Communities in the Republic of Kosovo;
- *Municipal authorities:*
 - Officials responsible for processing SAS application documentation and implementing agreements.
- *Other national institutions:*

- Ombudsperson, Free Legal Aid Agency, Faculty for Social Work staff, General Auditor, Labor Inspectorate and Red Cross of Kosova.
- *Civil society and private sector:*
 - National and local NGOs, religious institutions, charities, community activists, and volunteers assisting in dissemination of information or identification of potential beneficiaries; and
 - Business owners and service providers within the project area.
- *Media:*
 - National and local media outlets, including social media platform.

3.3. Disadvantaged/vulnerable individuals or groups¹

Within the Project, vulnerable or disadvantaged groups may include, but are not limited to, the following. These groups face unique barriers to accessing information and Project benefits, which must be addressed to ensure inclusiveness and equitable engagement.

Vulnerable Group	Barriers to Accessing Information or Project Benefits	Representative Organizations and Leaders
<i>The poor at large</i>	Limited financial resources, lack of access to technology, and limited mobility	Local NGOs working in poverty alleviation, community leaders
<i>Elderly people</i>	Mobility issues, lack of familiarity with digital tools, and health limitations	Senior citizen advocacy groups, municipal health and social service offices
<i>People with disabilities and their caretakers</i>	Physical and communication barriers, social stigma, and lack of accessible infrastructure	Disability rights organizations, municipal Centers for Social Work (CSW), Ministry of Finance. Labor and Transfers, Office for Good Governance and Human Rights within the GRK
<i>Orphans and young people with no</i>	Limited access to education and skills training, social isolation	Child welfare organizations, vocational training centers

Vulnerable Group	Barriers to Accessing Information or Project Benefits	Representative Organizations and Leaders
<i>support or employment</i>		
<i>Long-term unemployed</i>	Lack of skills and training, limited awareness of labor market opportunities	Employment Agency of the Republic of Kosovo (EARK), job placement NGOs
<i>Women-headed households</i>	Increased household responsibilities, social discrimination, and financial dependence	Women’s rights organizations, local women’s groups, and shelters for victims of violence
<i>Daily wage earners</i>	Job insecurity, lack of identification documents, and irregular income	Labor unions, community leaders
<i>Those living below the poverty line</i>	Limited awareness of social programs and difficulty in accessing public services	Local community leaders, poverty-focused NGOs
<i>Representatives of Roma, Ashkali, and Egyptian communities</i>	Discrimination, illiteracy, and lack of identification documents	Roma, Ashkali and Egyptian community organizations, religious leaders, activists, Office for Good Governance and Human Rights within the GRK
<i>Roma, Ashkali, and Egyptian neighborhoods and settlements</i>	Geographic isolation, poor infrastructure, and limited-service access	Local community councils, ethnic minority advocacy groups, Office for Good Governance and Human Rights within the GRK
<i>Other ethnic minorities and marginalized groups</i>	Social exclusion, language barriers, and lack of tailored outreach	Minority-focused NGOs, community elders, and municipal cultural offices
<i>Returnees, refugees, and asylum seekers</i>	Language barriers, lack of social networks, and difficulties in accessing basic services	UNHCR, IOM, and municipal refugee support services
<i>Victims of human trafficking, violence, and family abuse</i>	Fear of retribution, psychological trauma, and lack of legal support	Shelters, legal aid organizations, and anti-trafficking task forces

Vulnerable Group	Barriers to Accessing Information or Project Benefits	Representative Organizations and Leaders
<i>Families living in remote rural areas</i>	Distance from health and education facilities, limited transportation options	Municipal offices for rural development, local governance structures
<i>Vulnerable Group</i>	Barriers to Accessing Information or Project Benefits	Representative Organizations and Leaders
<i>Illiterate individuals</i>	Inability to understand written materials and limited access to alternative communication methods	Literacy advocacy groups, community educators
<i>Married minors</i>	Social isolation, lack of education, and vulnerability to exploitation	Child protection agencies, schools, and youth-focused organizations

Vulnerable groups within the communities affected by the SAS Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Representative organizations and leaders from these groups will be engaged as key partners to ensure inclusive stakeholder engagement.

The methods of engagement with vulnerable groups are detailed in the following sections and will include:

- Focus group discussions tailored to the specific needs and capacities of vulnerable groups.
- Simplified and culturally appropriate communication materials.
- Accessibility measures, including translation services, disability-friendly venues, and digital tools.
- Collaboration with community organizations and representatives to facilitate two-way communication.

This approach ensures the participation of all stakeholders and addresses barriers effectively, aligning with the World Bank’s Environmental and Social Standard (ESS) 10 requirements.

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

During project preparation, several public consultation meetings were conducted to inform the concept stage and development of the SAS Project. These meetings engaged diverse stakeholders, including government institutions, NGOs, community representatives, and international organizations. Consultations included virtual and in-person meetings, written communications, and workshops.

Key consultations conducted include:

- *Public Meetings and Open Consultations:* A public meeting was organized on August 30, 2019, led by the Ministry of Labor and Social Welfare (MLSW), involving stakeholders from municipal institutions, NGOs, and donor organizations. Key issues discussed included SAS reform needs, eligibility criteria, and ways to improve program coverage.
- *Targeted Consultations:* Meetings were held with municipal Centers for Social Work (CSWs), line ministries, and donors. For instance, consultations on March 26, 2019, and July 26-28, 2019, involved discussions on policy development, SAS eligibility criteria, and operational challenges in implementation.
- *Surveys and Interviews:* Data gathering through surveys and interviews was conducted in 2020 with CSWs in various municipalities. Key issues raised included capacity constraints, operational challenges, and feedback on existing criteria for SAS eligibility.

Details of stakeholder engagement activities, including dates, venues, participants, and issues discussed, are provided in **Annex Table 1**.

The environmental and social reports and plans were disclosed through government portals and shared with stakeholders during consultation meetings. Feedback received during these consultations included recommendations on poverty targeting, data verification mechanisms, and SAS reform inclusivity. These inputs were incorporated into the project design and are summarized in **Annex Table 1**.

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed to address the diverse needs of stakeholders, as follows:

- *Structured Agendas:* For formal meetings with government entities and donor organizations to ensure clear communication of objectives;
- *Focus Group Meetings and Discussions:* For engaging vulnerable groups such as women-headed households, persons with disabilities, and ethnic minorities to better understand their challenges and gather actionable feedback. Focus group meetings and discussions with Roma, Ashkali and Egyptian communities should be conducted in culturally appropriate ways, close to their localities.
- *Community Consultations:* Conducted in culturally appropriate ways to ensure inclusivity, particularly in rural or marginalized areas.
- *One-on-One Interviews:* To gather specific insights from CSW staff, local leaders, and representatives of vulnerable groups, especially representatives of Roma, Ashkali and Egyptian communities.
- *Site Visits:* To observe and address operational challenges in the field and identify infrastructure or capacity gaps.

Proposed Engagement Tools:

- Dissemination of accessible materials such as brochures, flyers, and posters in appropriate languages;
- Regular updates shared via the project website, press releases, and local media channels; and
- Traditional notifications, including announcements through community leaders or village councils, especially for Roma, Ashkali and Egyptian communities.

4.3. Stakeholder engagement plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/Message	Engagement Activities/Communication Tools	Target Stakeholders	Responsibilities
Preparation Phase	March-July 2021	Introduction to Project objectives, SAS reforms	Virtual meetings, written correspondence, press releases, dissemination of brochures, and social media publications	Government agencies, CSWs, donors, NGOs	MFLT
Implementation Phase	August 2021 onwards	SAS reform rollout, stakeholder roles	Focus group discussions with local communities and vulnerable groups, media briefings, targeted community meetings, information sessions, and digital updates (social media, website)	Local communities, Roma, Ashkali and Egyptian communities, women, persons with disabilities	MFLT, Municipalities CSWs
Competency Enhancement	Ongoing	Training on social assistance program and stakeholder roles	Trainings, workshops and one to one mentoring session for	CSW staff, Hired social workers Employee	MFLT, PCU Staff

			CSW staff, hired social workers, and employment advisors	nt counselors, NGOs	
Monitoring and Feedback	Quarterly during project	Updates on progress, feedback collection	Public meetings, project website updates, community consultations and surveys	All stakeholders	MFLT, PCU Staff
Inclusion of Vulnerable Groups	Ongoing	Ensuring equal participation and addressing the concerns of underrepresented groups.	Culturally adapted focus group discussions, targeted outreach, multilingual materials, and field visits to Roma, Ashkali, and Egyptian communities	Women-headed households, persons with disabilities, economically disadvantaged populations, Roma, Ashkali and Egyptian communities	MFLT, CSWs, NGOs,
Information Disclosure	During all phases of the project	Ensuring transparency in project execution and stakeholder communication	Public notices, press releases, website updates, brochures and posters in public spaces, CSWs, and Employment Offices	The public at large All stakeholders SAS beneficiaries	MFLT, PCU Staff

Vulnerable Groups: Special focus will be placed on engaging vulnerable groups such as women-headed households, persons with disabilities, and economically disadvantaged populations through targeted methods like culturally tailored focus groups and direct outreach.

Information Disclosure: Information will be disclosed in formats such as public notices, press releases, brochures, and the project website. Disclosures will include the Stakeholder Engagement Plan (SEP), relevant environmental and social documents, Grievance and Redress Mechanism (GRM) procedures, and regular updates on project developments. Materials will be made available in multiple languages, including Albanian and Serbian, to ensure accessibility for all groups. In addition, some materials will be made available in Roma language, as well.

4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

The PCU will be responsible for stakeholder engagement activities. The budget for implementing the SEP activities has been carefully planned to cover staff salaries and related expenses, events, communication campaigns, training sessions, beneficiary surveys, the implementation of the GRM, and other necessary costs.

5.2. Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are MFLT, including DSPF, SAS Division and other relevant bodies within Ministry.

The stakeholder engagement activities will be documented through consultation meeting minutes (**Annex 2**), attendance sheets, feedback forms, survey results, and progress reports prepared after each engagement activity. These records will include key discussion points, participant feedback, and actions taken to address stakeholder concerns. Additionally, summaries of stakeholder engagement activities will be periodically disclosed through the project website, newsletters, and public notices to ensure transparency and continuous communication with stakeholders.

6. Grievance Mechanism

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM will cover grievances related to both Eligibility-Based Claims and Project-Based Claims under SAS Project.

7. Monitoring and Reporting

7.1. Summary of how SEP implementation will be monitored and reported

The implementation of the Stakeholder Engagement Plan (SEP) will be monitored through a series of measurable indicators to ensure effective engagement and communication with stakeholders. Monitoring activities will include:

- Tracking the number of community meetings held to discuss project progress;
- Recording the number of information boards and communication materials (e.g., brochures, leaflets) displayed or distributed;
- Monitoring stakeholder feedback received through grievance mechanisms, surveys, and focus groups;
- Documenting the participation of vulnerable groups, such as women, persons with disabilities, and ethnic minorities, especially persons from Roma, Ashkali and Egyptian Community in engagement activities;
- Evaluating response times and resolution rates for grievances and enquiries submitted through the GM; and

- Conducting regular reviews of attendance sheets, meeting minutes, and feedback forms to assess the inclusiveness and reach of engagement efforts.

Stakeholders will be actively involved in monitoring activities where applicable, particularly community representatives and leaders of vulnerable groups. Feedback and observations from stakeholders will be incorporated into SEP reviews and adjustments.

7.2. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary during project implementation to reflect evolving project needs and stakeholder feedback. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents will be collated by the Project Coordination Unit (PCU). These reports will detail:

- The number and types of grievances and information requests received;
- The status of resolution and implementation of corrective/preventive actions; and
- An evaluation of the project's ability to address grievances and requests in a timely and effective manner.

Information on public engagement activities undertaken during the year will be communicated to stakeholders via:

- Public notices and newsletters distributed to local communities;
- Updates on the project website, including progress reports and engagement outcomes;
- Community meetings held at regular intervals to present updates and gather feedback;
- Information boards or displays in municipal offices and Centers for Social Work (CSWs);
- Targeted outreach to vulnerable groups using culturally appropriate methods (e.g., focus groups, direct engagement through local representatives).

7.3. Beneficiary Assessments and Surveys

Beneficiary Assessments and Surveys, as qualitative research methods used to gather insights from beneficiaries about the impact, have been conducted to evaluate the implementation of the SAS Pilot:

- Phone Surveys were conducted with 142 accepted applicants, 101 rejected applicants, and 50 existing beneficiaries to assess the SAS Pilot. These surveys covered applicants who applied to the SAS Pilot from May to July 2024 and were conducted in December 2024 and January 2025. Preliminary results indicate that beneficiaries are largely satisfied with the process, and SAS Pilot objectives are generally well understood. However, low awareness of GMR and limited digital literacy remain key challenges.
- Interviews were conducted with representatives from 14 Centers for Social Work across various locations. Additionally, seven government officials involved in the pilot's design and implementation were interviewed. Results indicate that the SAS Pilot is perceived as more effective than the current social assistance system, with communication carried out through various channels. However, challenges related to internet connectivity during home visits and digital access limitations were identified. Furthermore, rejection cases of applicants who passed the initial assessment require auditing and a secondary review.
- Focus Group Discussions - In February 2025, a series of focus group discussions were conducted with both beneficiaries and non-beneficiaries to gather their experiences and perceptions of the SAS Pilot. Final reports will be presented by mid-March 2025.
- Survey on Existing Beneficiaries collected data from 2,000 existing beneficiaries to assess how many current SAS beneficiaries would lose eligibility under the reformed SAS. Final reports will be presented by March 20, 2025.

Regarding future plans for surveys, additional surveys will be conducted for applications submitted between August 2024 and January 2025, as well as for reapplications in February 2025. The questionnaire will be administered to the same group of individuals using identical questions to facilitate response comparison. Subsequent surveys will expand the sample size and focus on regional disaggregation. Moreover, the Kosovo Agency of Statistics (KAS) plans to launch the Household Budget Survey (HBS) in 2026. This project will support the HBS design to ensure the collection of high-quality consumption and demographic data relevant to social assistance.

Annex 1: Summary of Stakeholder Engagement Activities

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
<i>Public Meeting</i>	August 30, 2019	Open consultation on SAS reform needs and challenges	All stakeholders: municipal representatives, NGOs, donors	Key reform areas, expanding SAS coverage, improving poverty targeting	Ylfete Ramosaj-Abazi, Ismail Gashi
<i>Targeted Consultation</i>	March 26, 2019	Reform options for SAS implementation	Municipalities (CSWs), line ministries, donors, NGOs	SAS eligibility criteria, data verification mechanisms, program expansion	Ylfete Ramosaj-Abazi
<i>Workshop</i>	July 26-28, 2019	Finalization of draft SAS reform proposals	CSWs, line ministries, donors, NGOs	Poverty test design, operational processes, and feedback mechanisms	Ylfete Ramosaj-Abazi
<i>Survey and Interviews</i>	July 7 - 16, 2020	Feedback on SAS implementation and Measure 15	CSWs in 11 municipalities, RAE representatives	Capacity challenges, criteria limitations, barriers for Roma, Ashkali and Egyptian communities, challenges with	Sara Coll-Black, Edita Alo

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
				documentation for SAS applicants	
<i>Virtual Meeting</i>	June 7 - 16, 2021	Defining project scope, objectives, and components	MFLT, DSPF, CSWs, donors	Project objectives, proposed components, support for capacity building	Sarah Coll-Black, Stefaine Brodman
<i>Targeted Consultation</i>	June 10, 2021	Outreach and profiling of SAS beneficiaries	CSWs, DSPF representatives	Methods to improve beneficiary profiling, linking with EARK	Sarah Coll-Black
<i>Virtual Workshop</i>	June 14, 2021	Feedback on MIS and Social Registry Proposals	MFLT, DSPF	Operational challenges with existing systems, requirements for improved MIS functionality	Zlatan Sabic
<i>Workshop</i>	October, 2023	Preparation for Project Launch	MFLT, DSPF, CSWs	Preparation of a detailed project launching event concept note	Mentor Morina

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
<i>Conference</i>	October 24, 2023	<i>Project Launch Conference</i>	All stakeholders: Municipal representatives, NGOs, donors, media	General presentation and launch of the SAS Project	PCU Staff
<i>Workshop</i>	October 24, 2023	<i>meeting with representatives of all CSWs</i>	CSWs Hired social workers	General presentation of the SAS Pilot	PCU Staff
<i>Conference</i>	18 May, 2024	<i>SAS Pilot Launch Conference</i>	All stakeholders: Municipal representatives, NGOs, donors, media	General presentation and launch of the SAS Pilot	PCU Staff
<i>A set of five (5) trainings</i>	May, 2024	Overview of SAS Pilot	MFLT CSW staff hired social workers	Understanding the General Criteria and Procedures of the SAS Pilot	PCU Staff Halime Rama Klit Shala
<i>A set five (5) of training</i>	June 2024	Verification, communication and GRM	MFLT EARK CSW staff hired social workers	Details on the verification process, communication principles, and the	PCU Staff

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
				scope, content, and implementation of GRM	
<i>A set of seven (7) regional information sessions</i>	From 8 th to 22 nd of July 2024	Raising public awareness about the SAS Project	Municipality representatives CSW staff Social Workers NGOs CSOs Women organizations Non-majority communities (With focus on Roma, Ashkali and Egyptian community)	Overview of the SAS Pilot: Beneficiary activation, role of NGOs and community representatives, engagement of Social Workers, common participation concerns, addressing misconceptions, and communication tools	Elvira Berisha
<i>Printed Materials</i>	July, 2024	The production of 100 posters and 4000	CSWs Beneficiaries Potential beneficiaries	The posters and brochures provided essential	Elvira Berisha

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
		brochures in Albanian and Serbian		information for the current processes, such as where SAS applicants can access decisions regarding their applications, Help Desk and advise to families benefiting from the pilot to register as jobseekers with the EARK.	
<i>A set of four (4) sessions</i>	July, 2024	Reinforcement trainings and tablet distribution	MFPT CSW staff hired social workers	Detailed clarification on the functioning of the SAS Pilot and guidelines for tablet use"	PCU Staff
<i>A set of two (2) online sessions</i>	August, 2024	Verification visits	MFPT CSW staff Hired social workers	Preparation for verification visits, focused on	PCU Staff

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
				procedures, logistic issues and IT	
<i>Information session</i>	November, 2024	Dissemination of information for the SAS Pilot to non-majority communities	Non-majority community representatives NGOs advocacy non-majority issues	Purpose and benefit of the SAS Pilot, application process and eligibility criteria, beneficiary verification, labor market activation and stakeholder engagement	PCU Staff
<i>Training</i>	November, 2024	General overview of the SAS Pilot and activation component	EARK Employment Consolers	Objectives of the reform on social scheme, the content and procedures of SAS Pilot and activation component	PCU Staff
<i>Training (with support of GIZ)</i>	November, 2024	In-depth training for skills development on the SAS Pilot and	EARK Employment Consolers	Detailed explanation and discussion on the content and procedures of	PCU Staff

Activity Type	Date/Time Period	Purpose/Topic	Target Stakeholders	Key Issues Discussed	Person(s) Responsible
		activation component		SAS Pilot and activation component	
<i>Online Session</i>	December, 2024	Technical aspects of SAS Pilot	CSW Hired social workers	SAS Pilot verification visit process, payments and other related topics	PCU
<i>A set of eight (8) focus group meetings</i>	February, 2025	Feedback for SAS Pilot	CSWs Hired social workers Non-majority communities Beneficiaries and non-beneficiaries	Feedback from beneficiaries and non-beneficiaries regarding their experiences and perceptions of the SAS Pilot	PCU Staff
<i>Meeting (with Political Advisor to Prime Minister Elizabeth Gowing)</i>	February, 2025	Inclusion of non-majority communities	Prime Minister Office	Inclusion of non-majority communities within SAS Project, with specific focus on Roma, Ashkali and Egyptian Communities	Elvira Berisha

Annex 2: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Dates of Consultations	Summary of Feedback	Response of Project Implementation Team	Follow-up Action(s)/Next Steps	Timetable / Date to Complete Follow-up Action(s)

CONSULTATION ENGAGEMENT PLAN

1. Executive Summary

The Social Assistance Reform in Kosovo aims to support the most vulnerable families through the introduction of new eligibility criteria for benefiting social assistance, as well as by providing stable employment opportunities for work-able family members. The first phase of the pilot began in May 2024, with citizens starting to apply for the project, and the first payments were executed in October 2024. To ensure that citizens are well-informed about the project's purpose and the opportunities to apply, numerous activities will be implemented, focusing on informing the public, especially those who have been previously excluded from social assistance under the current legislation. These groups are often from vulnerable communities, so an engagement plan tailored to their needs is essential.

The engagement activities will take place across all regions in Kosovo and will aim to reach citizens at the local level, particularly those in rural areas or communities with minority populations. As the project progresses into its second phase—focused on activating the labor market—engagement will also be needed to inform citizens about their obligation to register with employment offices and the measures available for social assistance beneficiaries.

The engagement strategy will be national in scope but will focus on local-level activities, inviting citizens and community leaders to apply and ensuring the information is accessible to all, especially in villages and areas predominantly inhabited by non-majority communities.

2. Goals & Objectives

Key Goals:

- **Increase Public Awareness:** Raise awareness among citizens about the social assistance reform and its benefits;
- **Promote Citizen Participation:** Encourage eligible citizens, particularly from vulnerable and marginalized groups, to apply for the pilot program;
- **Support Employment Activation:** Inform beneficiaries about their responsibilities to register with employment offices and the labor market activation measures available; and

- **Ensure Access to Information:** Ensure that citizens, especially those from remote or minority communities, are fully informed and able to participate in the process.

Measurable Objectives:

- Conduct **7 regional informational sessions** across Kosovo by the end of Q2 2025;
- Organize **3 press conferences** to increase media coverage and reach broader audiences;
- Reach **1,000 participants** in community meetings or trainings by the end of 2025, including at least 5 % from non-majority communities;
- Distribute **500 informational brochures and posters** to various municipalities, social work centers, and employment offices;
- Launch **10 social media posts** to disseminate key information, with a goal of reaching **50,000 people** online;
- Collect feedback from **at least 300 respondents**, including at least 5 % from non-majority communities, through surveys to assess the level of understanding of the SAS project.

3. Activities - Methods and Tools

Physical Engagement:

- **Informational Sessions:** Organize sessions in all 7 regions of Kosovo to inform citizens about the social assistance reform;
- **Press Conferences:** Host regular media briefings to update citizens and address any concerns or questions;
- **Meetings with Minority Communities:** Conduct focused meetings with representatives of minority groups to ensure inclusive outreach;
- **Training for Social Work Centers:** Equip social workers with the knowledge and tools to explain the reform to beneficiaries;

- **Training for Employment Advisors:** Prepare employment counselors to explain key concepts of the project and labor market activation measures to citizens;
- **Help Desk:** Establish a dedicated help desk with publicly available contact information for citizens to ask questions and seek assistance;
- **Interviews:** Participate in media interviews to inform them about the project and collect their feedback;
- **Virtual Groups:** Create online discussion groups where CSW workers and employment counselors can share their experiences and ask questions related to individual cases; and
- **Complaint Mechanism:** Establish a formal complaints procedure for addressing citizen concerns or disputes.

Digital Engagement:

- **Social Media Campaigns:** Post regular updates and key information about the SAS project across all major social media platforms;
- **Translation of Materials:** Ensure all published materials are translated into Kosovo's official languages to accommodate all communities, including translation of some materials in Roma language;
- **Video Tutorials:** Produce video guides explaining how to apply for benefits and the overall goals of the project;
- **Media Participation:** Appear on TV and radio programs to broaden reach and address questions from the public;
- **FAQ Series:** Develop and update a frequently asked questions section on the project website and in social media posts to clarify common concerns; and
- **Surveys:** Conduct online surveys to assess applicants' understanding of the project and their needs.

Written Communication:

- **Posters and Brochures:** Distribute printed materials with detailed information about the project in public spaces, social work centers, and employment offices; and
- **FAQ Documents:** Provide easy-to-read FAQ documents to help citizens better understand the application process and benefits.

4. Resources and Responsibilities

- **Team Roles:** A Project Coordinator will oversee the implementation of the engagement plan, supported by communication specialists, social work coordinators, and community outreach officers;
- **Budget:** Funding will be allocated to materials production (brochures, posters, videos), event organization (meetings, conferences), and digital media outreach (social media advertising, website development);
- **Timeline:** Activities will be rolled out gradually, with initial focus on informational sessions and media campaigns. Activities related to the activation will occur once activation communication plan is approved.

5. Evaluation & Feedback

To monitor the success of the engagement activities, the following indicators will be tracked:

- **Activity Completion:** Whether the planned events (meetings, media conferences, etc.) are executed on time and as planned;
- **Participation Rates:** The number of citizens attending meetings, engaging on social media, or participating in surveys;
- **Feedback Quality:** The depth and relevance of feedback received during surveys or one-on-one consultations, to gauge citizen understanding of the reform; and
- **Media Reach:** The number of people reached through social media campaigns and press conferences, and the level of engagement with those posts.

6. Conclusion

The citizen engagement plan for the social assistance reform is essential to ensure that all citizens, particularly those from vulnerable groups, are informed and able to benefit from the pilot project. By implementing a combination of physical, digital, and written outreach strategies, we will ensure that information is accessible to all and that citizens are actively involved in the reform process. This engagement will contribute to the success of the reform and help create a more inclusive, informed society.

GRIEVANCE REDRESS MECHANISM FRAMEWORK

1. EXECUTIVE SUMMARY

The Government of Kosovo (GoK) is fortifying its social protection framework through the Kosovo Social Assistance Reform (SAS) Project based on the ratified international agreement in April 2023, signed between the GoK and the International Development Association (World Bank Group). This project aims to improve the effectiveness of the Social Assistance Scheme (SAS) and lay the foundation for a stronger social protection system, enabling better responses to prospective crises.

The SAS Project focuses on strengthening social protection delivery systems through three key components:

1. Strengthening Social Protection Delivery Systems - This involves modernizing the SAS through investments in core delivery systems, including the introduction of digital payment systems for social benefits. These systems aim to improve financial inclusion, reduce fraud, and enhance overall system efficiency. The component also supports communication, outreach, and enrollment processes, including online applications and citizen engagement activities (First Component). Its sub-components include:

1.1. Strengthen the social protection delivery systems - This involves the development of the Social Registry Management System (SRMS), a critical part of SAS, which is foundational to reforming the broader social protection system. It also includes modernizing SAS delivery systems with a specific focus on introducing digital payment systems for the social benefits.

1.2. Supporting the activation of SAS beneficiaries - This aims to facilitate the transition of SAS beneficiaries from receiving social assistance to entering the labor market, ultimately supporting their graduation from the SAS program.

2. Improving the performance of the SAS - This component retroactively finances SAS benefit increases in response to COVID-19 and introduces poverty-based eligibility criteria, replacing categorical criteria. It also finances cash transfers under the new SAS Law (“Second Component”). Its sub-components include:

2.1. Responding to COVID-19 through SAS - This supports the additional financial assistance provided to SAS beneficiaries during 2021 to mitigate the negative economic impact of the COVID-19 pandemic.

2.2. Supporting the introduction of the new eligibility criteria for the SAS - This sub-component supports the implementation of new poverty-based eligibility criteria for SAS, replacing the previous categorical system. It includes piloting the new poverty targeting method and addressing lessons learned to improve the new SAS Law. Eligibility will be determined by a combination of means testing, proxy means testing, and asset-based assessments, following the regular administrative procedures.

2.3. Implementation of the proposed SAS Legislation - This includes adopting new SAS legislation to formalize poverty-based eligibility criteria, determine the duration of support, and establish rules for exit or recertification processes.

3. Project Implementation and Management - This component enhances the Ministry of Finance, Labor and Transfers (MFLT)'s ability to manage the SAS, ensuring compliance with World Bank financial management, procurement and environmental standards ("Third Component").

1.1. Purpose of the GRM

The Ministry of Finance, Labor and Transfers has developed and approved key operational documents to guide the implementation of the SAS Project. These include the Project Operations Manual (POM), focusing specifically on the First Component and Sub-Component 2.2 of the Second Component, as well as the Activation Manual, titled Pilot Implementation of the Activation of SAS Beneficiaries Operational Manual (Activation Manual), which comes into effect after its approval by the Ministerial Committee within the Ministry.

The purpose of this document is to inform project beneficiaries and stakeholders about the mechanisms available for raising concerns, grievances, or claims (collectively referred to as "claims"). These claims may pertain to:

- Issues involving irregularities or dissatisfaction with MFLT officials, Project Coordination Unit (PCU) officials, Employment Offices staff within the Employment Agency of the Republic of Kosovo (EARK), and with contacted staff during project implementation or activation activities;
- Concerns related to the processes outlined in both the POM, Activation Manual and other manuals.

The GRM is not only intended to provide a platform for raising claims but also to outline the process by which these claims will be addressed. Additionally, it helps MFLT and PCU officials monitor and evaluate project implementation and activation phase more effectively, allowing for timely intervention when necessary. The lessons learned through the GRM process will be applied to the new SAS legislation, particularly in Sub-Component 2.3 of the Second Component.

1.2. Scope of the GRM

The GRM framework provides grievance channels and procedures with a primary focus on addressing claims across phases of the SAS Project. This includes the following components:

1. Sub-Component 2.2 of the Second Component (Eligibility Claims):
 - Piloting of new eligibility criteria under the SAS Pilot Program; and
 - Grievances related to beneficiaries transitioning from the current categorical criteria to the new poverty-targeting-based SAS Pilot. Also, new potential beneficiaries can raise claims about their eligibility during their application in the SAS Pilot.
2. Component 1.2 of the First Component (Activation Phase/Project-Based Claims):
 - Grievances arising from activation-related activities aimed at integrating work-capable SAS beneficiaries into the labor market; and
 - Activation-specific grievances may include delays in registration at Employment Offices, issues with individual employment plans, dissatisfaction with activation measures or mediation services, or complaints about unfair treatment during activation processes.
3. Other Areas of the First Component (Other Project-Based Claims):
 - Grievances related to the First Component, such as project outreach activities, enrollment processes, and other related areas.

The GRM will offer five distinct channels for handling claims from all project beneficiaries, including existing SAS beneficiaries transitioning to the SAS Pilot and new applicants under the poverty-targeting criteria.

- **Eligibility Claims** - These are raised by both SAS beneficiaries and new applicants during their application or transition to the SAS Pilot. Existing beneficiaries can raise grievances regarding their eligibility under the new poverty-targeting-based criteria. New applicants can submit claims regarding their eligibility decisions, perceived unfair treatment during the application process, or concerns about documentation requirements.
- **Project-Based Claims** - These may be lodged by project beneficiaries, including but not limited to both existing and new applicants, who are dissatisfied with aspects of the project, such as being misinformed, not informed at all, or not receiving the requested assistance.

The GRM will be updated and revised as needed to address new challenges, providing further guidance on how to handle claims effectively.

1.3. Exclusions from the GRM

The GRM does not cover complaints or grievances related to the current SAS legislation regarding claims for payments, termination, or suspension of SAS benefits. These are governed by the existing legislative framework, primarily under the Law on General Administrative Procedure and existing Law on SAS, which outlines the process for resolving such complaints.

The only exception to this exclusion is the handling of claims related to SAS beneficiaries receiving or not receiving COVID-19-related top-up payments in 2021, as described in Sub-Component 2.1 of the Second Component. These claims will also be governed by current SAS Legislation and the Law on General Administrative Procedure.

1.4. Objectives of the GRM

The key objectives of the GRM are as follows:

- **Provide a Platform for Grievance** - Offering accessible and cost-free channels for lodging grievances related to project activities;
- **Timely and Effective Resolution** - Ensuring that grievances are addressed promptly and efficiently;
- **Encouraging Beneficiary Engagement** - Ensuring that project beneficiaries feel engaged and that their concerns are heard and addressed during the claim's submission process;
- **Address SEA and SH Concerns** - Providing an avenue for reporting instances of Sexual Exploitation and Abuse (SEA) or Sexual Harassment (SH); and
- **Facilitating Claims on Eligibility** - Handling grievances related to non-compliance with new eligibility criteria, or wrongful termination or reduction of SAS benefits.

2. BACKGROUND AND METHODOLOGY

The World Bank supports the Government of Kosovo to strengthen its social protection system through the Kosovo Social Assistance System Reform Project (SAS Project). The Project seeks to improve the performance of the Government's Social Assistance Scheme (SAS) as the first step in a broader reform of the Government's social protection spending and enhance social protection delivery systems, which will also lay the building blocks for the broader reform of Kosovo's social protection system and a more effective response to future crises. The project will also support the Government's reform of the SAS through the adoption and rollout of a new Law on the SAS.

To help different stakeholders distinguish between the ongoing SAS and the SAS pilot, this comparative table outlines the key differences:

Table 1 - Key Distinctions between Ongoing SAS and SAS Pilot

Criteria	Ongoing SAS	SAS Pilot
<i>Eligibility</i>	<i>Based on categorical criteria</i>	<i>Based on poverty status</i>
<i>Application Process</i>	<i>Manual</i>	<i>Fully digital via E-Kosova</i>
<i>Benefit Amount</i>	<i>Varies by category</i>	<i>Fixed amounts (e.g. EUR 60 for head of household, EUR 30 for adults, EUR 18 for children)</i>
<i>Grievance Submission</i>	<i>Through CSWs and Ministry</i>	<i>Through five intake channels: (i) e-Kosova platform, (ii) social media (e.g., Facebook), (iii) project-based email channel, (iv) local CSWs, and (v) the Help Desk Line.</i>
<i>Integration with Labor Market</i>	<i>Not applicable</i>	<i>Integration with employment programs</i>

Beneficiaries have the opportunity to make new applications for both the ongoing SAS and the SAS pilot. The processes for applying to these schemes are distinct with different technological access. If a beneficiary is selected through the SAS Pilot, they will not be able to receive benefits through the ongoing SAS.

Beneficiaries who meet the existing categorical criteria stipulated in the existing SAS legislation can apply for the ongoing SAS. Applications must be submitted in person in physical format through the Centers for Social Work (CSWs). Beneficiaries need to visit the local CSW office, fill out the required application forms, and provide the necessary documentation to support their eligibility claims. CSW officials are available

to assist the beneficiaries with the application process, ensuring they understand the requirements and procedures.

On the other hand, the pilot SAS project is based on new eligibility criteria focused on poverty status through means testing rather than categorical criteria. Applications are fully digital and must be submitted through the e-Kosova platform.

The MFLT's website includes a comprehensive Frequently Asked Questions (FAQs) section addressing common questions and concerns related to both the ongoing SAS and the pilot. This ensures beneficiaries have access to important information at all times. Community outreach activities, including workshops and informational sessions, will be conducted regularly to educate beneficiaries about the differences between the ongoing SAS and the pilot. These sessions aim to ensure that all community members, especially those who may have limited access to digital tools, are well-informed about their options and the application process.

In addition, beneficiaries can access personalized support through the helpdesk and official email. Trained staff in the PCU are available to answer specific questions and provide additional guidance tailored to individual circumstances.

3. METHODOLOGY OF GRM FRAMEWORK

The Grievance and Redress Mechanism (GRM) Framework was formulated drawing upon data acquired during the Initial Assessment of the Social Assistance GRM. Within the Initial Assessment, a quantitative approach methodology was employed, focusing on discerning patterns and trends pertaining to the reception of grievances, resolution and effectiveness rates, and caseload within each of the Center for Social Work (CSW) tasked with administering SAS benefits. This analysis was completed by an examination of complaints received and resolved at the Ministry of Finance Labor and Transfers (MFLT) level, serving as a secondary appeal instance. The data were sourced directly from officials of the CSWs and MFLT, with additional insights gleaned from the Agency for Free Legal Aid (AFLA).

Furthermore, a comprehensive desktop review of project documents, including the Project Appraisal Document (PAD) and the World Bank Environmental and Social Framework (ESF), enriched the SAS GRM Framework with pertinent information.

During the Initial Assessment of the Social Assistance GRM, critical stakeholders, project beneficiaries, and service providers were identified. Subsequent to this

identification, relevant interviews were conducted with key personnel from MFLT and CSWs regarding the administration of SAS.

4. KEY PROJECT STAKEHOLDERS AND THEIR ROLES

The Initial Assessment Report has identified several pivotal stakeholders crucial to the functioning of this GRM Framework. Their roles and responsibilities are outlined in the table below:

<ul style="list-style-type: none">● Stakeholder● Ministry of Finance, Labor, and Transfers (MFLT)	<ul style="list-style-type: none">● Roles and Responsibilities● Allocate suitable working spaces for the Complaint Commission to address and resolve grievances received through the E-Kosova platform.● Promptly establish the Complaint Commission and designate alternate members in the event that a commission member is unable to participate in meetings for any reason.● If necessary, and depending on the volume of grievances received, additional public officials may be assigned to support and facilitate the work of the Complaint Commission.● Documenting GRM proceedings, decisions, and feedback● Categorizing grievances into “low”, “medium”, and “high” risk categories, resolving the latter in collaboration with the Head of PCU
Project Coordination Unit (PCU)	<ul style="list-style-type: none">● Coordinating the escalation process (e.g. high-risk grievances) for unresolved grievances from

Complaint Commission

- Centers for Social Work (CSWs)

the Social Expert to the Ad-Hoc Committee

- Providing feedback to affected parties and stakeholders involved in project related grievances
- Reporting progress to the Head of PCU, Ministry, the Government and the World Bank in the required formats
- Planning and conducting GRM training for CC, Help Desk, and CSW staff
- Ensuring coordination with CSWs on referrals to the Help Desk, CC, or PCU.
- Managing complaints received through E-Kosova and other channels and ensuring timely resolution.
- Providing quarterly reports on resolved grievances to the MFLT and PCU
- Participating in training activities as required
- Ensuring that decisions rendered under this component aligning with the piloting rules adopted by the Government for the new SAS
- Coordinating any additional issue with the GRM focal point at the PCU.
- Operating at the municipal level, CSWs implement SAS and serve as the point of contact for beneficiaries and aggrieved parties. They instill confidence in the GRM, gather feedback, and enhance the GRM through insights. CSWs facilitate access to the GRM for individuals lacking

- Employment Agency of the Republic of Kosovo (EARK)
 - digital proficiency and assist in using electronic grievance submission processes.
 - Referring cases to the Help Desk, CC or PCU, depending on the nature of the grievance, and recording these referrals in their internal record.
 - Collaborating with the PCU on referrals and providing updates on case progress.
 - EARK activates SAS beneficiaries within the labor market, linking unemployed project beneficiaries with job opportunities or skill enhancement programs. EARK informs CSWs and/or respective commission if beneficiaries are reluctant to engage in employment-seeking endeavors or decline job offers (activation measures), which may result in the termination of social assistance benefits.
- Tax Administration of Kosovo (TAK)
 - TAK facilitates data exchange related to formal incomes, essential for SAS Project operations. During the means testing phase, TAK provides data to determine the income levels of potential beneficiaries, assessing their eligibility for social assistance benefits.
- Civil Registry Agency (CRA)
 - CRA provides essential data and facilitates cross-checking of information declared by applicants, ensuring family union certificates accurately reflect household composition.

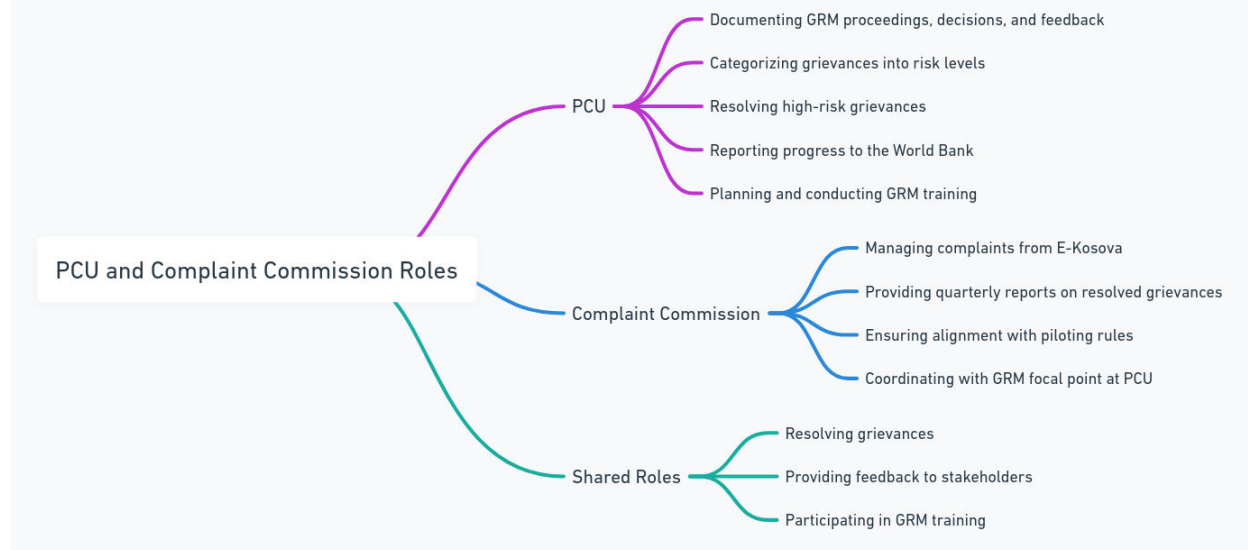
- Immovable Property Appraisal Department (IPAD)/MFLT
- Project Beneficiaries
- Other Relevant Third Parties/Stakeholders
- IPAD provides official data concerning the market value of assets for asset testing, rendering applicants ineligible for SAS benefits if they hold assets exceeding a value of 100,000 euros.
- Recipients of SAS benefits and individuals or households eligible under new criteria introduced by the SAS Project.
- Include opposition political parties, Ombudsperson, Agency for Free Legal Aid, Ministry of Justice (MoJ), National Audit Office, Labor Inspectorate, national media, NGOs, and religious institutions. They play significant roles in disseminating information, supporting project implementation, ensuring adherence to rules, and addressing grievances related to sexual exploitation, abuse, harassment, or gender-based violence.

Each of these stakeholders plays a significant role in shaping, influencing, or overseeing various aspects of the project’s implementation and operation, ensuring the effectiveness and transparency of the SAS Project.

Whereas, details on the implementation of activation measures, including roles, responsibilities, and additional procedural guidelines, are outlined in activation manuals. This GRM Framework complements the Activation Manual by providing a mechanism for grievance redress specific to activation-related concerns.

5. THE SAS PROJECT GRIEVANCE AND REDRESS MECHANISM - INSTITUTIONAL ARRANGEMENTS

The institutional framework for the SAS Pilot is structured as a single-tiered system, where the Complaint Commission (CC) or the Project Coordination Unit (PCU) serves as the grievance resolution point depending on the classification of the grievance, within single GRM mechanism.



Venn Diagram of the PCU and Complaint Commission

5.1. Complaint Commission (CC) Role and Responsibilities

The CC handles Eligibility-Claims, such as disputes over the inclusion or exclusion of SAS beneficiaries from the SAS Pilot, and similar disputes related to activation measures. This includes but is not limited to the complaints regarding the criteria for eligibility, misclassification of beneficiaries, wrongful exclusion, or errors in the targeting process.

The CC will operate at the national level but will review claims arising from all local municipalities. It will be the final authority on disputes regarding beneficiary eligibility status. Once a claim is lodged, the CC will initiate a re-evaluation process for the appellant, review documentation, and if necessary, engage with social workers to verify the accuracy of claims. The decision of CC will be final unless appealed through a judicial process, which a judicial court decided otherwise.

The CC will have full access to the Eligibility-Claims database on the e-Kosova platform, allowing them to monitor grievances in real-time. Notifications will likely be sent to all CC members for every new complaint received. The e-Kosova platform will also enable the CC to submit decisions on complaints. Applicants will be notified of these decisions via their e-Kosova accounts.

Complaints can be submitted through five intake channels:

- (i) the e-Kosova platform;
- (ii) social media (e.g., Facebook);
- (iii) the project-based email channel (ankesa.sas@rks.gov.net);
- (iv) local CSWs; or
- (v) other project-specific communication points such as the Help Desk Line.

These channels serve as intake points, ensuring accessibility for all claimants. The CC is solely responsible for administering and resolving Eligibility-Claims, coordinating as needed with other entities to ensure each claim is directed to the appropriate body. The complaints window will remain open for **30 days** from the date applicants to the SAS Pilot receive their selection/rejection notifications. This period will allow applications to raise grievances or seek clarification about their eligibility status.

5.2. Project Coordination Unit (PCU) role and responsibilities

The PCU will handle grievances related to Project-Based Claims, such as service delivery, implementation delays, mismanagement of resources, or concerns about the transparency of project operations. This body is responsible for overseeing all project-related complaints from various Kosovo regions.

Grievances can be submitted through the same five intake channels. While these serve as intake points, the PCU ensures that Project-Based Claims are evaluated, investigated, and resolved appropriately, working in coordination with the CC to ensure the claims are routed to the correct authority, if applicable.

The PCU will also be responsible for administering the social media page (e.g., Facebook) under which grievances can be submitted. This includes ensuring that submitted grievances are recorded, tracked, and either resolved or directed to the appropriate authority for resolution.

The PCU will operate nationally, handling all Project-Based Claims, coordinating with local social workers to investigate and resolve complaints. These social workers located in local CSWs will record and coordinate grievances submitted in-person and ensure they are routed to either the PCU or the CC, depending on the nature of the claim. Grievances submitted to the PCU will be evaluated based on the nature of the complaint. Investigations may involve consultations with local social workers, service audits, and interviews with SAS beneficiaries. The PCU is responsible for ensuring that grievances are resolved in line with WB Guidelines.

A Project-Based Claims email channel has been established at ankesa.sas@rks-gov.net to handle grievances related to the project, including requests for information. An automatic response will be configured for incoming emails, providing details on eligibility criteria and available grievance mechanisms. The PCU will maintain the complaint email system and ensure the GRM log is regularly updated. Weekly short reports will be prepared to track progress, ensuring transparency and providing an overview of trends and common issues.

5.3. Coordination between CC and PCU

Given that both the CC and the PCU operate at the national level, there is a strong emphasis on coordination between these two bodies within single GRM. If grievances received by the PCU pertain to Eligibility-Claims, they will be referred to the CC for resolution, and vice versa for Project-Based Claims, to ensure that applicants are always directed to the appropriate GRM body for their specific complaint.

5.4. Help Desk Phone Line role and responsibilities

To ensure effective management of grievances, additional feedback channels such as Help Desk Phone Line will be functional to handle both application enquiries and other complaints in support of CC's and PCU's role. This structure will provide stakeholders and project beneficiaries with multiple ways to submit their concerns and ensure responses to grievances.

A Help Desk Phone Line will be operational, specifically designed to handle enquiries regarding the application process, including approval and rejection decisions for benefiting from the SAS Pilot.

Help Desk will have access to the application database, which will contain applicant details (name, surname ID, number, municipality) and reasons for rejection/selection. The Help Desk will be able to explain:

- The eligibility criteria for the SAS Pilot and activation measures;
- The method of determining the benefit amount or other benefits;
- The specific reasons for rejections or dismissal, where applicable;
- Instructions on submitting grievances to the e-Kosova platform or PCU for further complaint submissions if needed;

A short protocol will be developed outlining how the Help Desk team should interact with callers, ensuring consistent messaging and professional handling of enquiries. Authentication questions (e.g., name, surname, date of birth, ID number) will be used to verify the identity of callers before discussing their case.

Phone calls will be recorded in the GRM log, likely maintained in a shared Excel sheet. Each log entry will include details such as the caller's identity, the nature of the enquiry, and any information provided. This log will be regularly updated and monitored.

5.5. Center for Social Work (CSW) role and responsibilities

In addition to the Help Desk Line, PCU and CC, the CSW will play a key role as a focal point in providing direct support to project beneficiaries. The CSW will serve as an intermediary between the applicants and the grievance resolution bodies (i.e., CC or PCU) but will not have direct responsibility for handling or resolving grievances. Instead, its role is to guide, inform, and refer cases to the appropriate grievance-handling channels.

The CSW is positioned at the community level, providing a crucial frontline support role to assist beneficiaries of the SAS Pilot. The CSW's primary function is to assist beneficiaries in understanding their eligibility status and guide them to the correct grievance resolution channel if further action is required.

While the CSW will not handle grievance itself, it will play a role in ensuring that referrals to the appropriate grievance bodies are well-documented and tracked. Each case referred by the CSW to the Help Desk, CC or PCU should be documented in an internal record maintained by the CSW as further explained below.

The CSW will periodically follow up with the beneficiary to ensure that they are able to submit their grievance through the appropriate channels and offer further assistance if needed. Although the CSW will not intervene in the grievance resolution process, they will act as a liaison to ensure that the beneficiaries' or stakeholders' concerns are being addressed through correct avenues.

6. GRIEVANCE RECORDING AND RESPONSE TYPES

Grievances can be filed through four main channels: e-Kosova platform, Help Desk Line, CSW, Project-Based Claims Email, and social media (e.g. Facebook). Each grievance must be recorded in a centralized GRM log system. Below are the responsible entities for recording complaints:

6.1. e-Kosova Platform

The system automatically registers each complaint when submitted via the e-Kosova platform. A reference number is generated for tracking. The CC is responsible for reviewing and addressing complaints related to Eligibility-Claims and ensures that grievances are updated and tracked in the centralized GRM log.

6.2. Help Desk Line

Complaints or enquiries received via the Help Desk are logged by the Help Desk team. Any complex issues that cannot be resolved by the Help Desk are referred to the appropriate channel (e-Kosova or PCU), and these escalated cases are also logged. The Help Desk Team is responsible for logging enquiries and complaints in GRM log.

6.3. CSW

CSW does not record complaints itself but assists complainants in filing their grievances through e-Kosova platform, the Project-Based Claims Email or through other grievance channels. It helps ensure that grievances are submitted to the correct channels, which are then recorded by the relevant body. The CC or PCU records the

complaints in the GRM log once they receive them through the e-Kosova platform or the project email.

In addition, the Head of each CSW is responsible for keeping a simple, internal record of interactions and concerns raised by complainants. The internal record should at least include: (i) the nature of the inquiries or concerns raised by complainants, (ii) support or guidance provided (e.g., assistance with documentation, or clarification of processes), and (iii) any recurring issues or patterns observed that may signal broader systemic concerns.

This internal record will not replace the GRM Log system but will serve as a valuable supplementary tool to inform the PCU or CC, enhance the understanding of systemic issues, and improve overall grievances management processes. The internal record must be reviewed and shared with the PCU at regular intervals or upon requests.

6.4. Project-Based Claims Email

Complaints received through the Project-Based Claims Email are recorded by the PCU, which oversees Project-Based Claims (e.g., implementation issues). The PCU is responsible for logging these complaints in the GRM Log system.

6.5. Social Media (e.g., Facebook)

Claims submitted via Social Media platforms, such as the official project Facebook page (Projekti për Reformën e Sistemit të Asistencës Sociale të Kosovës | Pristina | Facebook), are monitored and recorded by the PCU. The PCU is responsible for reviewing complaints, addressing issues related to project implementation, and logging the grievances in the GRM log system. Additionally, responses to grievances are provided directly on the social media platform or redirected to the appropriate channels for resolution.

6.6. Triaging and back-end system for the five filing channels

The GRM framework relies on manual coordination and communication between responsible entities to ensure that grievances are routed to the appropriate body for resolution. The system prioritizes accessibility for citizens, allowing claims to be

submitted through any of the five channels: (i) e-Kosova platform, (ii) Help Desk Line, (iii) Centers for Social Work, (iv) Project-Based Claims Email, and (v) Social Media. While there is no automatic triaging system, designated personnel are responsible for reviewing, categorizing, and routing grievances to the appropriate entity. In certain cases, as will be explained below, no routing is required if the grievance reaches the correct entity directly, ensuring quicker resolution.

All grievances, regardless of the submission channel, are logged in the centralized GRM log system, ensuring a unified record for monitoring and resolution. The system categorizes grievances as either Eligibility-Based Claims or Project-Based Claims based on their nature:

- Eligibility-Based Claims involve issues such as wrongful exclusions, inclusion errors, or disputes regarding eligibility decisions. Such claims are routed to the CC. No routing is needed if eligibility claims are submitted directly through e-Kosova platform, as these complaints are already logged and sent automatically to the CC for resolution.
- Project-Based Claims relate to concerns about project implementation, such as delays, transparency issues, or operational shortcomings. No routing is needed for project-based claims submitted through Project-Based Claims Email, Help Desk, CSW, or social media, as these are managed directly by the PCU, or are in close coordination with designated personnel of CSWs.

As mentioned above, the complaints system is divided into five key response types, based on the nature of the complaint and the body responsible for addressing it:

- **CSW** - Social workers at the CSW are primarily facilitators and provide support to applicants, but they do not directly resolve grievances. CSWs refer complainants to the appropriate grievance-handling channels such as CC or PCU.
- **Help Desk Line** - The Help Desk team can resolve issues that are resolvable by phone such as providing information on eligibility criteria, explaining the benefit amount and similar enquiries. If the enquiry can be handled and resolved over the phone (e.g. explaining a minor administrative issue, clarifying missing documentation), the Help Desk provides the necessary information. For more complex grievances, the Help Desk refers the complainant to the e-Kosova platform for Eligibility-Claims or the PCU for Project-Based Claims.

- **Social Media** - the PCU monitors and administers grievances submitted through social media platforms, such as Facebook. If the grievance is straightforward and can be resolved directly, the PCU provides an appropriate response on the platform. For complex or high-risk project-related grievances, the PCU escalates the matter to an ad-hoc committee for resolution. If the grievance pertains to Eligibility-Claims, the PCU routes the case to the CC for further review.
- **CC** - The CC handles disputes related to Eligibility-Claims. After reviewing the complaint, CC issues a written decision to the applicant via e-Kosova within 30 days, with the possibility of an extension to 60 days for complex cases.
- **PCU** - The PCU resolves complaints about project implementation. Depending on the nature of the complaint, the PCU assembles a specialized team (e.g., Social Expert, Project Coordination, IT, Finance) to investigate and provide a resolution. The PCU provides a formal response to Project-Based Claims within 30 days, including detailed reasoning behind the decision and any corrective measures, if necessary.

7. GRIEVANCE INTAKE PROCESS, CATEGORIZATION FOR SAS PILOT AND ACTIVATION COMPLAINT PROCESS

The grievance intake process allows applicants and other stakeholders to submit their grievances through multiple channels. The process ensures that all complaints are systematically logged, triaged, and forwarded to the appropriate bodies for action.

7.1. Filing a Complaint

E-Kosova - Applicants who disagree with their eligibility decisions can submit a formal written complaint to the CC. This can be done through the e-Kosova platform by logging with their e-Kosova account, with support from CSW officials or Help Desk Team if needed, or through other channels such as project email, social media, local CSWs as described more below. Complaints must be submitted no later than 30 days after receiving the eligibility decision. Upon submission via e-Kosova, a confirmation message is automatically sent to the complainant, including a reference number to

track the complaint. The complainant can use this number to follow up on their complaint status and receive the final decision through e-Kosova account;

Project Emails - Project implementation, project staff misconduct, or activation specific claims can be submitted using the Grievance Form available on the MFLT's website and emailed to ankesa.SAS@rks-gov.net. Details about this email channel can be found on the Ministry of Finance, Labor, and Transfer's official website. To access the information:

1. Open the Ministry of Finance, Labor, and Transfer's official website;
2. Click on the Social Assistance section on the homepage;
3. Select the Kosovo Social Assistance Reform Project page, where the details of the email channel are displayed. The link to access this page directly is here:

<https://mfpt.rks-gov.net/Socialet/Page/975>.

Nonetheless, complainants can use other intake channels as described in this section.

Social Media (Facebook) - Complaints can also be submitted via the official project Facebook page managed by the PCU at (Projekti për Reformën e Sistemit të Asistencës Sociale të Kosovës | Pristina | Facebook). Simple grievances can be addressed directly on the platform. Complainants are encouraged to provide as much detail as possible when submitting complaints through social media.

Help Desk Line - Complaints can be submitted through the Help Desk Line by dialing +383 (0) 38 200 34 289 or +383 (0) 38 200 34 287. The Help Desk Team can resolve simple inquiries directly over the phone, such as providing information on eligibility criteria, benefit amounts, or addressing minor administrative issues. If a complaint is more complex, the Help Desk officer will gather the necessary information and refer the complaint to the CC for Eligibility-Based Claims or to the PCU for Project-Based Claims.

CSW Support - The CSW acts as a focal point, assisting applicants with filing complaints but not resolving them directly. They ensure grievances are correctly submitted to the PCU or to the CC, with the assistance of the social worker placed at the local CSW.

Anonymous Submission - Complainants have the option to submit grievances anonymously through any of the available channels (except e-Kosova platform which

requires the account credentials). In such cases, the identity of the complainant remains confidential, and special provisions are made to ensure their protection.

SEA/SH/GBV Referrals: Complaints related to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV) are categorized as high risk and are handled with utmost confidentiality and sensitivity. These grievances are a special type of Project-Based Claims and are immediately escalated to the Head of the PCU requiring specialized attention, including referrals to medical and psychological support services if necessary. Only the minimum necessary information is sought, focusing on the nature and whether the alleged perpetrator is connected to the project.

Apart from Anonymous Submission or SEA/SH/GBV referrals, which require a distinct handling protocol, it is the responsibility of the Help Desk officer (in the case of Help Desk Line), the social worker placed at the CSW, or the PCU to gather all the necessary (minimum) information required for grievance resolution or appropriate routing. The information must be relevant for inclusion in the GRM Log and align with the fields in the Project-Based Claim template. The collected information should include, but is not limited to: (i) complainant's identity, (ii) date and nature of the complaint, (iii) details of the issue and (iv) any supporting documents or references provided by the complainant.

7.2 Grievance Categorization

Once grievances are received, they are carefully categorized to ensure appropriate handling, based on the risk level and type of complaint. The categorization process is critical for determining the urgency of the grievance and the appropriate body responsible for its resolution. The following categorizations are applicable to the SAS Pilot: (1) categorization by type, and (2) categorization by risk level.

- (1) **Categorization by Type** includes (i) Eligibility-Claims such as related to inclusion/exclusion from benefits, having the CC as responsible body, (ii) Project-Based Claims such as issues related to the implementation of the project, having the PCU as responsible body, and (iii) SEA/SH/GBV complaints, being a specific type of Project-Based Claim which require immediate attention and action, handled by the Head of PCU through forming appropriate committees.
- (2) **Categorization by Risk Level** includes (i) low risk such as minor administrative errors, handled directly by the PCU focal point or the Help Desk without

requiring escalation, (ii) medium risk such as moderate delays in payment or service delivery problems, usually referred to the PCU or CC which requires a further investigation / evaluation, and (iii) high risk such as grievances involving SEA//SH/GBV, fraud, corruption or issues that require field inspection for resolution. High-risk cases are immediately escalated to the Head of the PCU and addressed by an Ad-Hoc Committee within 2 days.

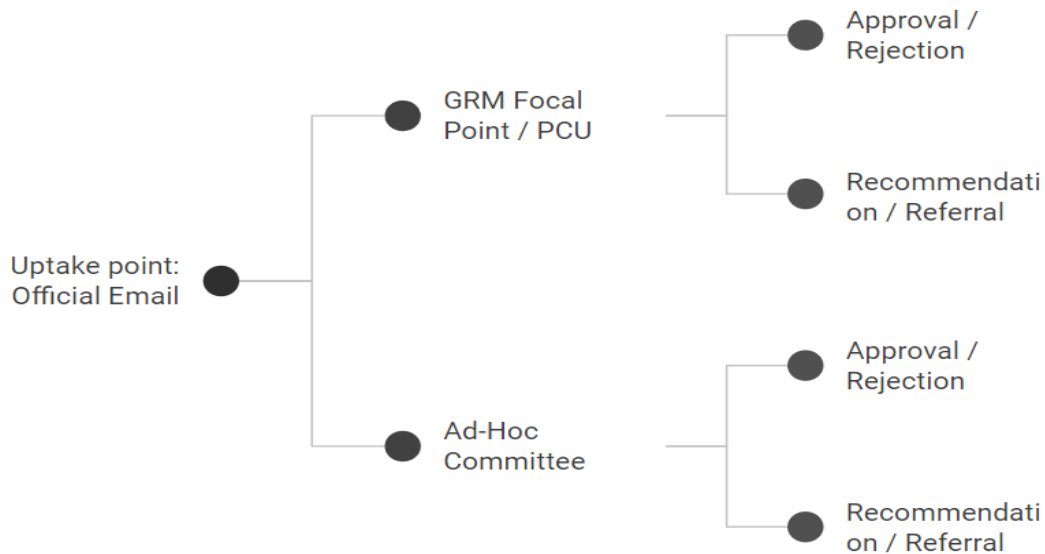


Chart - Illustration: Project-Based Claims Pathway

7.3. Constitution of the Ad-Hoc Committee and reporting cases to the Bank

The Ad-Hoc Committee is formed specifically to address high-risk grievances and includes a multidisciplinary team tailored to the nature of the complaint. The committee is constituted as follows:

- Head of the PCU, responsible for oversight and timely resolution - Chairperson;
- Social Expert of the PCU, to provide expertise on social issues - Member;
- Legal Officer of the Ministry, to review the legal implications and ensure compliance with relevant policies and procedures - Member;
- Technical Expert official of the Ministry, when relevant to the specific nature of the grievance (e.g., IT) - Member/Optional; and
- Independent Observer or Representative from Civil Society, - Observer/Optional.

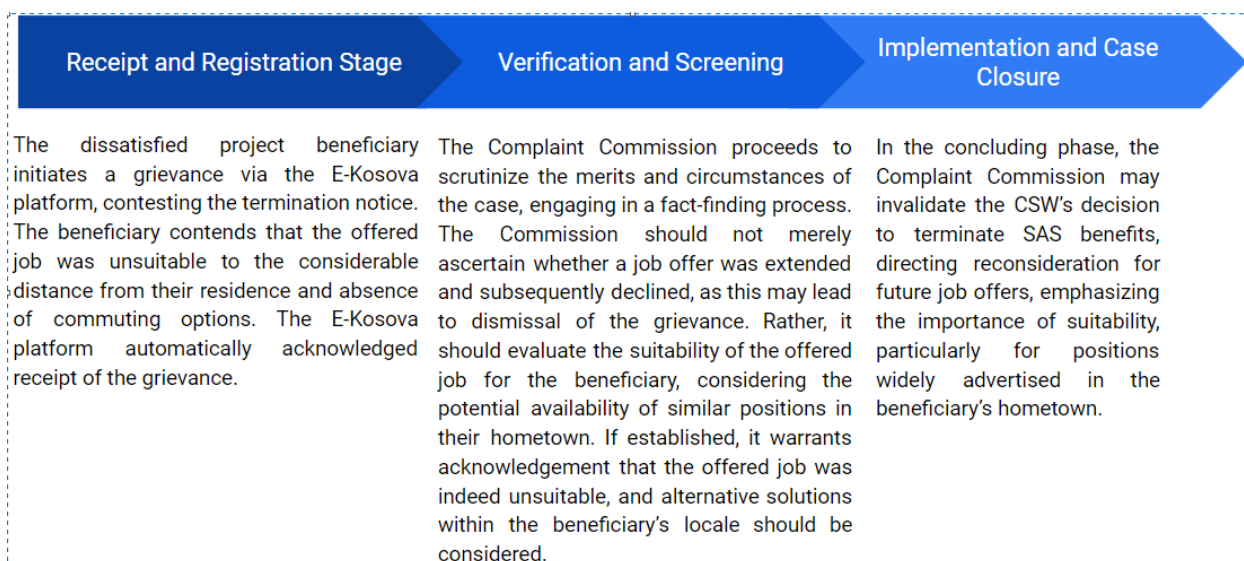
High-risk grievances, including those involving SEA/SH/GBV, fraud, or corruption, must be reported to the World Bank within forty-eight (48) hours of receipt or upon becoming aware of the grievance, to ensure timely coordination with the Bank and adherence to agreed-upon safeguards and protocols.

7.4. Hypothetical grievance and its resolution for activation-specific grievance combined with termination of SAS benefit

A plausible scenario in which grievances may arise within the context of the SAS Pilot relates to the registration process as unemployed persons at the EARK and the subsequent job offers facilitated through EARK services for persons aged 18 to 64 who are deemed fit for employment.

As outlined in the POM and in the Activation Manual, beneficiaries are required to register as unemployed with EARK, actively participate in individual profiling, and engage in labor market integration efforts, based on individual employment plan. In the event that a SAS beneficiary repeatedly declines job offers, EARK is required to notify the CSW, which will then issue a termination notice to the beneficiary via the e-Kosova platform.

For example, consider a hypothetical situation where a SAS beneficiary declines a job offer for a position in grocery or fruit and vegetable sales. The SAS beneficiary cites valid reasons such as the job location being approximately 45 kilometers away from their residence, the lack of commuting options, and a preference to seek employment opportunities closer to their hometown.



If a pattern of similar grievance emerges during the process, indicating potential systemic issues, the PCU should intervene. This intervention could involve analyzing the reasons why EARK officials are assigning unsuitable job offers and implementing additional training to prevent such occurrences in the future. The PCU's role in addressing systemic issues is a critical function of the GRM in ensuring the successful implementation of the project.

8. STRATEGIES FOR RISK MITIGATION

The absence of an automatic triaging system requires proactive and effective communication between the PCU, CC, and other relevant stakeholders (**Risk Factor 1**). If the system's responsiveness does not meet satisfactory standards and fails to direct project beneficiaries to the correct grievance mechanism, beneficiaries could potentially face financial harm regarding their SAS benefits, or the project will have operational shortcomings.

Additionally, a common risk for both Eligibility-Claims and Project-Based Claims is their reliance on digital tools (**Risk Factor 2**), which necessitates digital literacy among project beneficiaries to effectively access the GRM. This introduces an inherent risk, where beneficiaries lacking digital literacy may depend on external support, potentially limiting the accessibility of the GRM. This highlights the need for heightened vigilance in addressing risks faced by beneficiaries with disabilities, who may face dual challenges: accessing the online GRM and requiring additional assistance.

Another risk factor could be the lack of awareness among beneficiaries about the new eligibility criteria and grievance channels, or confusion during the transition from the ongoing SAS categorical criteria to the targeting eligibility criteria (**Risk Factor 3**).

Furthermore, MFLT officials may issue inconsistent decisions due to lack of understanding of the new eligibility criteria, or misinterpret the application of eligibility rules, leading to errors and potential grievances from beneficiaries (**Risk Factor 4**).

To effectively mitigate the risk factors identified within the GRM Framework, a range of risk mitigation strategies may be employed. These strategies can be directly integrated into the project's GRM, or they can complement existing project activities.

These strategies are outlined as follows:

- **Coordination between PCU and CC and vice-versa** - If a Project-Based Claim submitted to the PCU is identified as an Eligibility-Based Claim during the review process (e.g., claim about delayed application processing leading to exclusion), the PCU transfers the case to the CC. The PCU provides all related documentation, ensuring that CC has sufficient context to administratively investigate. The beneficiary is notified of the transfer and receives updates / decisions from the CC. If the CC identified that a claim received through e-Kosova platform involves project implementation issues, then such a claim is referred to the PCU. The PCU investigates and resolves any operational concerns of the Project. Both entities update the GRM system / log with progress, and the beneficiary is informed about the outcomes. Designated personnel at both the CC and PCU review pending grievances in the GRM system / log to ensure timely routing and resolution. Weekly coordination meetings may be held to address miscategorized or delayed grievances;
- **Communications and Outreach** - Given the importance of ensuring a seamless transition from the current SAS benefits provided under Law No. 2003/15 on the Social Assistance Scheme in Kosovo, as amended and supplemented by Laws No. 04/L-096 and No. 08/-176, to the benefits with new eligibility criteria under the SAS Project, continuous community and stakeholder engagements are essential. Clear and consistent communication through community meetings and stakeholder dialogues is crucial to mitigate potential resistance or confusion during this transition period. Partnering with local NGOs and community leaders to reach beneficiaries in remote or marginalized areas, ensuring that they are aware of the GRM channels is recommended.

Exceptionally, the use of traditional media (radio, print) may contribute to educating beneficiaries on the availability of non-digital grievance channels;

- **Establishment of a Help Desk Line** - To address the risk of conflating grievance channels and to ensure beneficiaries can easily access information on the correct GRM pathways, a Help Desk Line has been established in August 2024, with three team members. The Help Desk serves as a central point for guiding beneficiaries, answering basic questions about eligibility, and directing complaints to the appropriate grievance mechanism. The dedicated phone line also allow beneficiaries to lodge grievances without requiring access to digital platforms. Help Desk staff will submit grievances into the GRM system on the behalf of the caller;
- **Training Activities** - The implementation of training activities is essential to mitigate the risk of inconsistent decision-making among SAS Project officials and MFLT officials. Training sessions should focus on equipping project and public officials with the necessary skills and knowledge of eligibility rules and project activities to effectively conduct means testing, asset testing, and proxy means testing in accordance with the new eligibility requirements. The likelihood of errors or misinterpretation in the application of eligibility criteria can be minimized when ensuring that project and public officials are well-trained;
- **Strengthening Capacities in CSWs** - Strengthening the capacity of CSWs to provide tailored assistance to project beneficiaries with disabilities in accessing the GRM is essential. Thus, providing targeted training to CSWs officials on assisting with digital interactions for project beneficiaries is necessary. Thus, CSWs will act as physical access points for beneficiaries who cannot use digital tools. Social workers will assist beneficiaries in submitting grievances electronically or through alternative means, such as paper-based forms;
- **Enhanced Support for Individuals with Disabilities** - Online GRM platforms such as e-Kosova should comply with accessibility standards (e.g., WCAG 2.1), including screen reader compatibility, text-to-speech functions, and easy-to-navigate interfaces. In addition, providing sign language interpreters or video relay services for individuals with hearing impairments, either at CSWs or through online support is warranted;
- **Monitoring and Reporting Activities** - Establishing robust monitoring and reporting mechanisms with appropriate evaluation indicators is important to

ensure the effectiveness of the SAS Project, particularly in the implementation of the GRM. Through systematic monitoring, PCU can assess whether the GRM is being executed correctly and whether project beneficiaries are satisfied with its accessibility and responsiveness. Furthermore, monitoring activities can help identify areas for improvement in GRM. This proactive approach enables timely modifications or simplifications to the GRM chain or referral pathways, ensuring alignment with the overarching objectives of the project. In addition, activation grievances will be included in the GRM reports, to provide insights into the volume, nature, and resolution status of activation-related complaints.

9. MONITORING AND FEEDBACK MECHANISMS

The procedure for obtaining feedback is integral to the continuous improvement of the GRM project implementation. Indeed, the feedback obtained during the implementation phase offers invaluable insights into potential interventions within the GRM chain. The following mechanisms will be implemented to ensure effective monitoring and feedback: (i) community feedback; (ii) stakeholder engagement; (iii) surveys and satisfaction assessments; (iv) and coordination meetings (“Key Monitoring Activities”) as further elaborated below.

9.1. Key Monitoring and Feedback Activities

Key monitoring and feedback activities include the following:

- **Community Feedback** - Includes regular or periodic meetings with communities where SAS project beneficiaries are concentrated, to gather direct feedback in group settings;
- **Stakeholder Engagement** - Targeted meetings with heads of CSWs, Employment Offices, and the PCU to review grievance trends, address unresolved grievances, and refine the GRM processes;
- **Survey and Satisfaction Assessments** - User satisfaction surveys distributed to project beneficiaries and key stakeholders at two key points: (i) immediately after grievance resolution, and (ii) a few months post-resolution for long-term effectiveness assessment. Survey results will be analyzed to identify trends, recurring issues, and areas for improvement. Moreover, surveys distributed to

key stakeholders, including project beneficiaries, should aim to gather information on the responsiveness and effectiveness of the GRM amongst other things. Surveys should at least be conducted bi-annually, either online or in-person during field visits, and should cover a wide participation. In addition, the PCU will conduct a periodic analysis of grievances recorded in the GRM log to identify recurring or systemic issues; and

- **Coordination Meetings** - Regular internal monitoring meetings between the CC and PCU to coordinate any urgent routing, resolve delays in grievances, and address potential claim misclassification. Targeted meetings of PCU members with key stakeholders such as with heads of CSWs will be conducted at least quarterly, with the agenda focusing on feedback regarding grievance handling efficiency, identification of systemic issues, and challenges encountered in implementing the GRM. Insights gathered will be documented in a summary report prepared by the PCU.

9.2. Reporting Requirements and Responsibilities of the PCU

To ensure accountability and informed decision-making, the GRM reporting process will follow a structured framework. Reports will be compiled monthly, quarterly, and annually, based on the type of information required and the audience.

Key stakeholders for reporting include World Bank concerning the progress updates on grievance handling and systemic issues as per agreed reporting formats. In addition, regular updates to the Ministry, including the Department for Social Schemes, and other relevant government bodies. Periodic disclosures for external stakeholders and the general public, summarizing grievance statistics, trends, and corrective actions is also envisaged. Reports depending from the context, will include at least the following: (i) the quantity and nature of grievances filed through GRM procedures, categorized by eligibility claims, project-based claims, and activation-specific grievances, (ii) the level of satisfaction with grievance resolution based on feedback mechanism, (iii) the number of grievances resolved, (iv) systemic issues identified and addressed (if applicable), (v) corrective actions undertaken to improve project implementation (if applicable), and (vi) modifications to the GRM as a result of feedback received from project beneficiaries.

The PCU will be responsible for compiling reports as part of its role in overseeing the GRM and ensuring that all grievances are documented, tracked, and addressed in a timely manner. The PCU will coordinate with other stakeholders, including the CC,

CSWs, and EARK, to gather the necessary data. In addition, the PCU will collect aggregate data from the central GRM Log, which includes grievances recorded through various channels, and ensure that all grievances are categorized by type and risk level. Based on the data collected, will prepare monthly, quarterly and annual reports. These reports should follow templates and formats agreed upon (e.g., Annex G). In report compilation, key performance indicators shall be included.

The PCU shall work with CSWs, CC, and EARK to verify data, track progress on unresolved grievances, and ensure alignment with GRM procedures. Based on the received inputs, the PCU/MFLT, if deemed necessary, can develop a detailed plan to implement changes based on the report as per template provided in Annex G of this GRM Framework. This plan should undergo continuous monitoring based on the indicators outlined in the Monitoring and Reporting Chapter of this GRM Framework. Furthermore, any planned changes should be disclosed in reports to the public, as per the same chapter.

While the PCU is the lead in compiling reports, other stakeholders play supporting roles. For instance, CC shall provide quarterly updates on resolved grievances and pending cases. CSWs shall maintain records of referrals and provide feedback on grievances logged at the municipal level. Employment offices within the EARK shall supply feedback on activation-specific grievances and any data related to labor market integration.

9.3. Key Indicators for Evaluating GRM Efficacy

The efficacy of the GRM within the framework of SAS Project implementation can be evaluated through the following indicators:

- **Accessibility** - Documentation should be maintained to assess the ease with which project beneficiaries can access the grievance system. This assessment may rely on survey results, monitoring mechanisms, user satisfaction with the GRM, and similar avenues;
- **Responsiveness & Effectiveness** - Monitoring efforts should focus on determining whether grievances are resolved within the designated timeframe, typically within 30 calendar days. In cases where grievances prove to be complex, it is essential to ascertain whether the aggrieved party was duly notified of any anticipated delays in addressing their grievance; and

- **Fairness and Consistency** - Monitoring activities should also scrutinize and validate the consistency of decision-making processes, both at the initial and appellate levels, within the SAS Project. This involves ensuring that decisions regarding grievances are fair and consistent across all instances within the project framework.

Each evaluation aspect should be assigned a scoring point, and feedback must be furnished by the PCU in instances where the scoring falls below satisfactory levels. Such feedback should entail identification of the root cause contributing to the low score, as well as proposed mitigating measures to address these issues, such as:

- Implementing training programs to improve the understanding and implementation of GRM among project officials and public officials;
- Review the GRM procedures and the Operational Manual (OM) to streamline the process such as simplifying requirements; and
- Enhancing the communication channels between parties involved, especially in the context of Feedback Collection mechanisms.

10. RECOMMENDATIONS AND STEPS AHEAD

As the implementation of the Social Assistance Scheme (SAS) pilot project progresses, it is essential to continually assess and refine the Grievance and Redress Mechanism (GRM) to ensure its effectiveness and responsiveness to beneficiary needs. The following recommendations and steps ahead are proposed to enhance the GRM framework and support the successful delivery of the SAS pilot project:

10.1. Recommendations

1. Regular Monitoring and Evaluations - Conducting regular monitoring and evaluation of the GRM to identify any emerging issues and areas for improvement. Use feedback from beneficiaries to make data-driven adjustments to the GRM processes and procedures.

2. Capacity Building and Training - Providing ongoing training for GRM to Ministry, Help Desk Team and CSW officials to ensure they are equipped with the necessary skills and knowledge to handle grievances effectively.

3. Enhanced Communication and Outreach - Strengthening communication strategies to ensure beneficiaries are aware of the GRM and how to access it.

4. Technology and Accessibility Improvements - Enhancing the functionality and user-friendliness of the e-Kosova platform to ensure it meets the needs of all beneficiaries, including those with limited digital literacy.

5. Transparency and Accountability - Maintaining transparency in the GRM process by regularly publishing reports on the types and resolutions of grievances.

10.2. Steps Ahead

1. Implementation of Recommendations - Developing an action plan to implement the recommendations outlined above, with specific timeline and responsibilities assigned.

2. Stakeholder Engagement - Continuing to engage with key stakeholders, including beneficiaries, CSW officials, and PCU staff, to gather feedback and build support for the GRM.

3. Policy and Legislative Support - Work with policymakers to ensure that the lessons learned from the SAS Pilot are incorporated into future SAS legislation.

4. Feedback Integration into GRM Framework Changes - Insights gained from targeted meetings, surveys, and grievance analyses will assist the PCU and the Ministry for broader GRM improvement. The PCU should consolidate feedback into a semi-annual GRM Performance and Improvement Report (see, Annex G), highlighting key findings and proposed interventions. This report will be reviewed with the head of the PCU and shared with relevant stakeholders, including the World Bank. Recommendations from the report will guide modifications to policies, procedures, and training within the GRM Framework to address systemic issues effectively.

Annex A

Legal Context of SAS GRM in Kosovo and evaluation aspects

Preceding July 2023, when the Assembly of the Republic of Kosovo enacted the Law on Amending and Supplementing the Laws Containing Special Administrative Procedures and their Harmonization with Law No. 05/L-031 on General Administrative Procedure, the GRM process or simply referred to as the complaint process under the SAS legislation consisted of three distinct levels, namely (i) the first instance complaints procedures managed by CSWs, (ii) the second instance complaints procedures managed by MFLT; and (iii) judicial review as an additional available mechanism.

Post July 2023, the procedural framework between points (i) and (ii) underwent simplification, resulting in the existence of the following mechanisms:

- a. **First instance appeal (MFLT):** Appeals against determinations concerning social assistance benefits or non-benefits are now redirected to a higher authority, eliminating the intermediary involvement of CSWs. This higher authority is constituted as the Complaints Commission, established by ministerial decision under the auspices of the Minister of MFLT. The Minister of MFLT is mandated to delineate the composition and mandate of the commission through a regulatory instrument. The appeal process and examination adhere strictly to the provisions outlined in the Law on General Administrative Procedure, incorporating specific provisions: i) Appeals of first instance decision (CSW determinations) may be lodged within 30 days from the date of acceptance of the decision; ii) The Complaints Commission is obligated to render a decision on the appeal within 30 days from the receipt date.

- b. **Judicial review (Court):** Decisions issued by the Complaints Commission are subject exclusively to challenge through recourse to a basic court, initiating an administrative dispute process.

The Initial Assessment of the SAS GRM delineated various weaknesses and strengths inherent in the GRM within the SAS framework. It is pertinent to underscore that the evaluation remarks articulated herein pertain solely to the period preceding July 2023, as subsequent data post-amendments are unavailable.

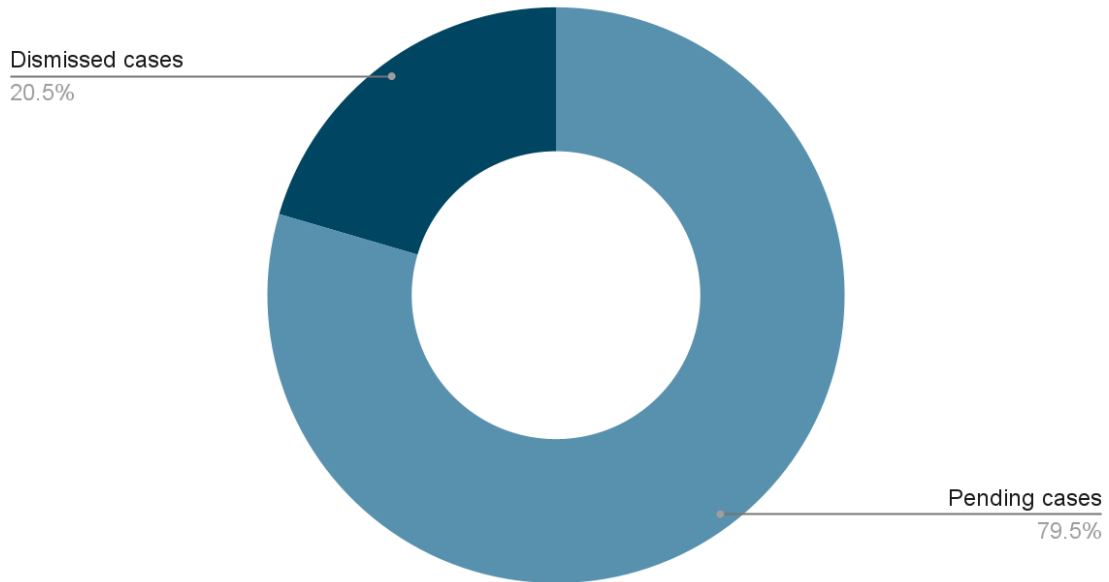
Foremost, the following weaknesses of the SAS GRM were discerned:

- a. **Limited Accessibility:** The accessibility of the GRM remained limited. Requests for reviews and complaints were exclusively accepted in a physical format, precluding alternative means such as online platforms.
- b. **Ineffectiveness of CSWs as first instance:** The efficacy of CSWs in resolving SAS requests for review at the initial instance was notably deficient. For instance, in 2022, a mere 19.35% of cases were resolved at the CSW level, with a further decline to 17.43% in 2023 as illustrated in the Initial Assessment Report of the GRM SAS Project. A survey conducted among CSWs revealed that the primary reason for not resolving cases directly at the CSW level, consequently necessitating escalation to the second instance, predominantly pertained to medical examination of applicants to ascertain their work capability, as stipulated by prevailing SAS legislation. Additionally, resource constraints were cited as contributing to this ineffectiveness. Notably, caseload analysis indicated that caseload volume did not consistently correlate with resolution effectiveness at the CSW level. It is noteworthy that despite the Municipality of Prizren managing twice the caseload of Municipality of Shtime or Municipality of Suhareka, it achieved substantially higher case resolution rates.
- c. **Limited transparency:** Apart from legislative publications in Kosovo's Official Gazette, CSWs failed to disseminate any guidance or informative tools on how to lodge complaints. The absence of specific information regarding the process and location for lodging complaints foster reliance on independent decisions, potentially leading to inconsistent approaches. Furthermore, the lack of published guidelines on complaint procedures, with instructions typically provided during in-person interactions, risks perpetuating information asymmetry and unequal dissemination of instructions among SAS beneficiaries.
- d. **High workload of the Complaints Commission at the second instance:** Owing to the observed inefficacy of CSWs in resolving cases at the initial instance, the Complaint Commission at the MFLT bore the burden of resolving these cases. However, it is crucial to note that commission members fulfill their responsibilities in the Complaints Commission as supplementary engagements alongside their primary duties and operational responsibilities. For instance, in 2022, 890 complaints were received, translating to an average of 3.4 cases resolved per working day, based on 260 working days in a calendar year, without accounting for additional daily tasks.

On the other hand, one notable strength of the current GRM system pertains to its adherence to legal compliance in the decision-making process of the Complaints

Commission. According to the data outlined in the Initial Assessment Report, in the sole year of 2022, there were 44 cases brought before the court due to the commencement of administrative disputes. Among these cases, 20.5% were dismissed, none were upheld, and the remainder are currently pending. This data illustrates the commendable diligence exercised by the Complaints Commission in ensuring alignment with legal standards during the evaluation of received complaints.

Court Administrative Disputes



Annex B Eligibility-Claims through e-Kosova form

The applicant is allowed access to complaints mechanism via E-Kosova, after the final decision is being issued:

1. Please indicate the nature of your complaint [*note to IT: it should be possible to select/complain about more than one reason*]
 - 1.1. I didn't receive any decision letter on my eligibility
 - 1.2 The CSWs Commission did not take into account the difficult living conditions
 - 1.3 Entitlement to a larger benefit amount
If 1.3 complain is selected, then the following automated message will appear: The SAS Pilot will provide 60 euros for the head of the household, 30 euro for every other adult at or above the age of 16, and 18 euros for every child under the age of 16 years
 - 1.4 After reading the above, do you still have a complaint about the benefit formula?
Yes/No.
 - 1.5 The benefit has not been received despite being confirmed as a beneficiary
If option 1.5 is selected, the following question appear:
 - 1.5.1 Please provide the Bank account number of the head of the household (To be filled in by the applicant)
 - 1.6 The benefit was completely discontinued or partially reduced.
If 1.6 complain is selected, then the following automated message will appear: The household income will be automatically checked on a monthly basis. If the average total income per adult equivalent over the past 3 months surpasses XX per month, then benefit level of the household will change.]. If income is from labor, benefits will be gradually reduced. If your household income rises above the set threshold during monthly tests, you will not lose benefits immediately. Instead, you will stay in the pilot for an additional three months with reduced benefits as your income increases (gradual benefit reduction of 0.50 cent for every 1 euro gained through formal income).
 - 1.7 After reading the above, do you still have a complaint about the discontinuation or reduction of benefits? Yes/No.
 - 1.8 Do you have any other complaints not mentioned above? (please specify).
- 2 The applicant is given the opportunity to attach any document he/she considers to support the complaint
- 3 After the applicant clicks "send the complaint", the following message is automatically sent to the email:

Automated Generated response

Thank you for informing us about your grievance.

We confirm the receipt of your complaint with the unique number:

-----.

The Commission is carefully assessing the information you have submitted and will inform you within 30 days of the outcome of your complaint or if any additional information is needed.

Project-Based claims form

Reference number (optional):	
Full name (optional)	
Address	
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	A. By post: Please provide mailing address: _____ _____ _____ B. By _____ telephone: C. By _____ e-mail: _____
Preferred language of communication	A. Albanian B. Serbian C. English (if possible)
Description of incident for grievance	What is your complaint about?
Please provide additional details to your complaint (What happened? Where did it happen? Who did it happen to? What is the result of the problem?)	
Please attach any document that you consider supports your complaint (if any):	
Date of incident / grievance:	
A. One-time incident/grievance (Date): B. Happened more than once (how many times?): C. On-going (currently experiencing problem):	

What would you like to see happen?

SEND

Annex C
Automated messages for acknowledgement of grievance

Automated Generated response

Thank you for informing us about your grievance.

We confirm the receipt of your complaint with the unique number: _____.
The Commission is carefully assessing the information you have submitted and will inform you within 30 days of the outcome of your complaint or if any additional information is needed.

**Annex D
Template Decisions**

Date __/__/____
Decision No. ____/____

In accordance with Law No. 08/L-162 on Kosovo Social Assistance Project and Government Decision No. **, dated **, after thorough review and consideration of your appeal regarding non-compliance with Means Testing, the Appeal Committee upon examination of the complaint grounds presented, it has determined that there are valid reasons to warrant a revision of the initial decision, by adopting this:

DECISION

1. Appeal submitted by Mr/Mrs **, born on **, with personal identification number **, with residing address at ***, municipality of **** has been approved. Household members associated with this appeal are as follows:

1.1. Name & Surname, born on **, with personal identification number **

1.2. Name & Surname, born on **, with personal identification number **

2. The Center for Social Work is obliged to reevaluate your household's Means Testing eligibility for the Social Assistance benefit within thirty (30) days.

3. This decision is electronic and becomes effective upon successful upload to the E-Kosova Platform.

REASONING

The Appeal Committee has thoroughly reviewed the grounds presented in your appeal, including

- a. the incorrect information about asset ownership, or
- b. inaccuracies in the data presented about incomes, or
- c. incorrect household composition data. [*Select one*]

Upon review, it has been found that there are discrepancies between the information provided and the actual circumstances. The Appeal Committee acknowledges the importance of ensuring accuracy and fairness in the Means Testing process. Therefore, the Center for Social Work is obliged to reevaluate your household's eligibility for the Social Assistance Scheme benefit within 30 days, taking into account the corrected information provided during the appeal process.

This decision is based on the guidelines and piloting rules set forth by Government Decision No. **, dated ** and aligns with the objective of Kosovo Social Assistance Project ratified based on the Law No. 08/L-162 on Kosovo Social Assistance Reform Project.

Grievance Instruction: No further review of this decision is allowed. However, should you believe that there has been an error in the way the Social Assistance Reform Project is implemented, you may file a complaint for the project implementation activities at e-mail: _____, at any time.

Date __/__/____
Decision No. ____/____

In accordance with Law No. 08/L-162 on Kosovo Social Assistance Project and Government Decision No. **, dated **, after thorough review and consideration of your appeal regarding non-compliance with Asset Testing, the Appeal Committee upon examination of the complaint grounds presented, it has determined that there are valid reasons to warrant a revision of the initial decision, by adopting this:

D E C I S I O N

1. Appeal submitted by Mr/Mrs **, born on **, with personal identification number **, with residing address at ***, municipality of **** has been approved. Household members associated with this appeal are as follows:

1.1. Name & Surname, born on **, with personal identification number **

1.2. Name & Surname, born on **, with personal identification number **

2. The Center for Social Work is obliged to reevaluate your household's Asset Testing eligibility for the Social Assistance benefit within thirty (30) days.

3. This decision is electronic and becomes effective upon successful upload to the E-Kosova Platform.

R E A S O N I N G

The Appeal Committee has thoroughly reviewed the grounds presented in your appeal, including

- a. the incorrect information about asset ownership

Upon review, it has been found that there are discrepancies between the information provided and the actual circumstances. The Appeal Committee acknowledges the importance of ensuring accuracy and fairness in the Asset Testing process. Therefore, the Center for Social Work is obliged to reevaluate your household's eligibility for the Social Assistance Scheme benefit within 30 days, taking into account the corrected information provided during the appeal process.

This decision is based on the guidelines and piloting rules set forth by Government Decision No. **, dated ** and aligns with the objective of Kosovo Social Assistance Project ratified based on the Law No. 08/L-162 on Kosovo Social Assistance Reform Project.

Grievance Instruction: No further review of this decision is allowed. However, should you believe that there has been an error in the way the Social Assistance Reform Project is implemented, you may file a complaint for the project implementation activities at e-mail: _____, at any time.

In accordance with Law No. 08/L-162 on Kosovo Social Assistance Project and Government Decision No. **, dated ** after thorough review and consideration of your appeal regarding the Social Assistance benefit, the Appeal Committee upon examination of the complaint grounds presented, it has determined that there are valid reasons to warrant a revision of the initial decision, by adopting this:

DECISION

1. Appeal submitted Your appeal by Mr/Mrs **, born on **, with personal identification number **, with residing address at ***, municipality of *** has been approved. Household members associated with this appeal are as follows:

- 1.1. Name & Surname, born on **, with personal identification number **
- 1.2. Name & Surname, born on **, with personal identification number **

2. The Center for Social Work is obliged to reevaluate your household's eligibility for the Social Assistance benefit within thirty (30) days.

3. Non-realised Social Assistance payments will be rectified retroactively if the benefit was cut or not received without fault on the beneficiary's part.

4. This decision is electronic and becomes effective upon successful upload to the E-Kosova Platform.

REASONING

The Appeal Committee has thoroughly reviewed the grounds presented in your appeal, including

- a. your entitlement to a larger amount of benefit,
- b. the failure to receive the benefit despite being confirmed as a recipient, or
- c. the wrongful termination of benefits due to an employment offer from the Employment Agency. [Select one]

Upon review, it has been found that there were errors or oversights in the initial decision-making process, which led to your incorrect benefit amount OR, non-receipt of benefits despite confirmation, OR wrongful termination of benefits [Select one].

As a result of this decision, the Center for Social Work is obliged to review the decision within 30 days, taking into account the findings of the Appeal Committee. Additionally, any missed payments will be rectified retroactively without fault on the beneficiary's part.

This decision is based on the guidelines and rules set forth by Government Decision No. **, dated ** and aligns with the objective of Kosovo Social Assistance Project ratified based on the Law No. 08/L-162 on Kosovo Social Assistance Reform Project.

Grievance Instruction: No further review of this decision is allowed. However, should you believe that there has been an error in the way the Social Assistance Reform Project is implemented, you may file a complaint for the project implementation activities at e-mail: _____, at any time.

Annex E

List of reviewed legislation and further documentation sources

Reading materials:

- A Guide to Designing and Implementing Grievance Mechanisms for Development Projects (The Office of the Compliance Advisor/Ombudsman, 2008)
- Federal Government of Somalia, Grievance Redress Mechanism Manual, Somalia Crisis Recovery Project (January 2020)
- Gaining Traction or Spinning Wheels? Factors Influencing the Effectiveness of Grievance Mechanisms in World Bank-Financed Projects (H. Pfeil & S. Agarwal, 2021)
- Government of Saint Vincent and the Grenadines Grievance Redress Mechanism for World Bank Development Projects, Volcanic Eruption Emergency Project (March, 2022)
- Grievance Redress Mechanism Framework for the AfDB - Nigeria Electrification Project
- Kosovo Social Assistance Scheme Study Assessment and Reform Options (S. Brodmann & E. Elezaj, 2019)
- Project Appraisal Document, Kosovo Social Assistance Reform Project (International Development Association, 2021)
- The World Bank Environmental and Social Framework (2017)

Reviewed Legislation:

- Law No. 2003/15 on the Social Assistance Scheme in Kosovo, as amended and supplemented by Laws No. 04/L-096 and No. 08/-176
- Law No. 08/L-162 on Kosovo Social Assistance Project
- Law No. 08/L-176 on Amending and Supplementing the Laws Containing Special Administrative Procedures and their Harmonization with Law No. 05/L-031 on General Administrative Procedure
- Law No. 05/L-031 on General Administrative Procedure
- Criminal Code No. 06/L-074
- Criminal Procedure Code No. 08/L-032.

Annex F
Contact details for SEA/SH/GBV Grievances

Institution	Contact details
Kosovo Police	192
Health Emergency Service	194
Kosovo Police Pristina Region	038502223
Medical Family Center Pristina	038/220841
Kosovo Police Peja Region	039433273
Medical Family Center Peja	039421418
Kosovo Police Gjakove Region	0390322482
Medical Family Center Gjakove	0390/324-234
Kosovo Police Mitrovica Region	028532628
Medical Family Center Mitrovica	028532104
Kosovo Police Prizren Region	029244355
Medical Family Center Prizren	03820044791
Kosovo Police Gjilan Region	0280/330188
Medical Family Center Gjilan	0280320781

Kosovo Police Ferizaj Region	0290/322406
Medical Family Center Ferizaj	03820046049

Annex G
GRM performance and improvement report
(Template)

1. Executive Summary

Provide a brief overview of the GRM’s performance during the reporting period, and highlight key achievements and improvements implemented. Also, outline a summary of challenges and recommendations for improvement.

2. Grievance Statistics

Please fill out the table below:

Grievance Type	e-Kosova	Email	Facebook	Help Desk Line	CSWs	Total
Eligibility-Claims						
Project-Based Claims						
Activation-Specific						
High-Risk Complaints						
Total						

Please also insert a line or bar chart to visualize trends in grievance volume and types over the reporting period

Char 1: Grievance Trends Over Time

3. Performance Indicators

Please fill out the table below:

Indicator	Target	Actual	Performance
Accessibility	[%] of beneficiaries report easy access to GRM.	[%]	[Met/Not Met]
Responsiveness & Effectiveness	[%] of grievances resolved within 30 days.	[%]	[Met/Not Met]
Fairness & Consistency	[%] of decisions upheld as fair and consistent.	[%]	[Met/Not Met]

Provide a summary of findings from the performance evaluation, and highlight areas where targets were not met and why.

4. Stakeholder Feedback

Provide a summary of feedback collected through surveys, in-person meetings, and follow-up calls with past complainants. Outline key trends and recurring themes identified in feedback.

5. Analysis of Systemic Issues

Describe patterns observed in grievances (e.g. repeated Eligibility-Based Claims), and identify root causes contributing to systemic issues.

6. Recommendations and Improvement

Outline if specific training programs are needed, and/or propose revisions to streamline GRM Procedures, including simplifying grievance submission (if applicable).

Highlight recommendations for improving digital platforms and include suggestions for improving outreach to beneficiaries about GRM access and procedures (if applicable).

7. Corrective Actions Implemented

Outline actions taken during the reporting period to address identified issues in the past GRM Performance and Improvement Report (if any).

8. Public Disclosure

Describe how key updates to GRM processes were communicated to stakeholders (e.g., through public reports, announcements on social media, etc.) if applicable.
