Serbia Noncommunicable Diseases Prevention and Control Project (P180619)

Workers' Grievance Mechanism

1 Introduction and general background on the Grievance Mechanism and its importance

The obligation to establish a Grievance Mechanism (GM), both for project workers and for external stakeholders, stems from the World Bank's Environmental and Social Standards, specifically ESS2: Labor and Working Conditions and ESS10: Stakeholder Engagement and Information Disclosure. Therefore, this obligation must be implemented in all projects financed by the World Bank, including the Serbia Noncommunicable Diseases Prevention and Control Project (SNDPCP).

Under World Bank requirements, a Grievance Mechanism is an essential tool for enabling the timely and effective resolution of concerns and complaints related to the project. In Serbia, there is currently no equivalent legal obligation to establish such mechanisms under national legislation.

A Grievance Mechanism serves as an alternative dispute resolution tool that enables affected individuals to raise concerns, lodge complaints, or seek clarifications regarding project-related impacts in a manner that is accessible, transparent, confidential, and free of retaliation.

A detailed description of the GM is provided in the Stakeholder Engagement Plan (SEP) for the SNDPCP, which was adopted by the World Bank as an integral part of the project documentation. (Serbia Noncommunicable Diseases Prevention and Control Project (P180619); Stakeholder Engagement Plan (SEP), Final document, September 2023).

2 Grievance Mechanism for Workers (GMW)

The **Grievance Mechanism for Workers** is substantively aligned with the requirements of the World Bank's standards on Labor and Working Conditions, as set out in the **Environmental and Social Framework for Investment Project Financing (IPF) Operations**, specifically **ESS2: Labor and Working Conditions (2018)**. This includes provisions related to protecting the workforce, establishing grievance mechanisms, and ensuring occupational health and safety (OHS). [Source: World Bank Guidance Note for Borrowers, Environmental and Social Framework for IPF Operations – ESS2: Labor and Working Conditions (2018). Available at: https://documents1.worldbank.org]

The Grievance Mechanism for Workers enables all individuals engaged in the implementation of the project - including those employed under employment contracts or other contractual arrangements - to submit grievances, complaints, or comments related to:

- Working conditions and terms of employment
- Occupational health and safety concerns
- Interpersonal relations, including gender-based issues and harassment
- Observance of labor rights and standards

This mechanism guarantees that workers can raise concerns freely and confidentially and that any issues are resolved promptly and fairly, consistent with ESS2 requirements. The key purpose of establishing the **Grievance Mechanism for Workers (GMW)** is to enable project workers to raise concerns and complaints related to the project's labor environment and working conditions, particularly those concerning respect for labor rights and health, safety, and security conditions on the construction site. Accordingly, the GMW addresses workplace-related and occupational health and safety (OHS) grievances submitted by project workers, including both **direct workers** and **contracted workers**. For project workers who are directly engaged or employed by the Contractor, the GMW shall be established and made operational by the Contractor **no later than 30 days from the date of contract signing**.

Particular attention within the **Grievance Mechanism for Workers (GMW)** is dedicated to preventing and addressing behaviors that may constitute **Sexual Exploitation and Abuse (SEA)**, **Sexual Harassment (SH)**, and **Gender-Based Violence (GBV)**. Accordingly, designated responsible persons shall be trained and equipped to recognize SEA, SH, and GBV grievances and to refer such cases to relevant national processes and support systems, applying a **survivor-centered approach** that ensures absolute confidentiality and anonymity. These grievances will be managed separately from other grievances but will follow the same procedural steps and timeframes described below, including grievance intake and the overall process value chain.

The Labor Management Procedures (LMP) document for the Serbia Noncommunicable Diseases Prevention and Control Project (P180619) (Final document, September 2023) describes the approach and procedures for implementing the requirements of the World Bank's ESS2: Labor and Working Conditions standard. This standard governs labor engagement and working conditions in projects financed through World Bank loans. One of the main purpose of the LMP is to avoid, mitigate, and manage risks and adverse impacts to which workers engaged on the Project may be exposed, and to define working conditions in line with both national legislation and the requirements of ESS2. ESS2 identifies the categories of workers likely to be engaged in the Project, specifies the conditions for their employment or engagement, defines the requirements and standards that must be met, and sets out the policies and procedures to be followed. It also assesses potential risks and describes mechanisms for implementing measures to ensure compliance with this standard. The Grievance Mechanism for Workers specifically addresses issues such as occupational health and safety, working conditions, wages, problems and risks encountered during work activities, hygiene concerns in shared facilities, and the prevention of sexual exploitation and abuse, among others. Workers are assured that the use of the grievance mechanism will not result in any retaliation or adverse consequences in their relationship with the employer.

The establishment and functioning of the **Grievance Mechanism for Workers (GMW)** is the responsibility of the **Contractor**, in continuous coordination with the **Project Coordination Unit (PCU)**. The respective roles and responsibilities of the Contractor and the PCU are defined in **Chapter 8**.

The Contractor is required to inform every project worker engaged under the Project about the GMW through: (i) training sessions, and (ii) a printed **GMW Information Brochure**. Each project worker shall receive a printed copy of the GMW Information Brochure upon signing his/her employment contract. Detailed information is also available in the **Labor Management Procedures (LMP)** document, which, together with other relevant project documents, is accessible on the Project's website: https://www.zdravlje.gov.rs/tekst/426186/ekolosko-socijalni-instrumenti-pknbrs.php. In addition, the Contractor is obliged to provide each project worker, upon request, with a printed copy of any of these documents.

The **Table of GMW Implementation Steps** defines the timeframes for resolving grievances received under the mechanism. In cases requiring urgent action and/or support, a response shall be provided on the same day. All grievances and requests will be recorded within **two working days**, and reviewed with a decision issued within **ten working days**. Following this, corrective actions will be undertaken to address the root cause of the grievance. A formal resolution will then be communicated to the complainant within **ten working days** of completing the grievance review process.

If it is determined that a grievance falls outside the scope of the Project's Grievance Mechanism, the complainant will be informed accordingly and provided with information on alternative avenues for resolving the issue.

Responses to anonymous grievances or submissions may be posted in written form in common areas used by workers and/or on the notice board at the construction site.

3 General Principles of the GMW

The general principles for the development of the GMW are set out in the document **Serbia**Noncommunicable Diseases Prevention and Control Project (P180619) Labor Management

Procedures (LMP); Final Document, September 2023.

Given that the **SNDPC Project** is being developed and implemented across multiple locations and within numerous healthcare institutions, and that a significant number of Contractors will be engaged in its execution, the Grievance Mechanism for Workers in the SNDPC Project consists of two interlinked components.

The first, **general component**, is developed as a **Framework for the Grievance Mechanism for Workers (FGMW)**. This Framework serves as a general guideline and defines in detail the procedures and steps for lodging and resolving grievances and complaints, as well as the measures and mechanisms for protecting complainants from potential retaliation or reprisal.

The second component contains **specific additions and adaptations** reflecting the particular characteristics of project activities and works at each location, as well as the operational specifics of the healthcare institution where the sub-project is being implemented.

The **Project Coordination Unit (PCU)** is the central body responsible for organizing and overseeing the functioning of the GMW. Within the PCU, a **Central Grievance Register (CGR)** will be established to record all grievances received. The PCU will appoint two permanent members to the **Grievance Committee**.

For each sub-project, a **Local Grievance Register (LGR)** will be established. The Contractor and the relevant healthcare institution will each appoint one authorized person responsible for managing the LGR, and this person will also serve as a member of the Grievance Committee.

The authorized person designated by the Contractor is responsible for registering any grievance received in the LGR, providing a description and explanation of its context, and forwarding the grievance to the CGR.

Where necessary, the FGMW may be supplemented with new categories of information specific to the unique characteristics of individual sub-projects. However, such supplements must in no way diminish the rights, measures, or protection mechanisms defined under the FGMW.

All principles defined in the FGMW are fully applicable. Modifications may only relate to specific organizational aspects of the healthcare institution where a sub-project is implemented. Any required modifications will be defined by the PCU in consultation with authorized representatives of the healthcare institution and the Contractor.

4 Key Principles of the Grievance Mechanism for Workers

Accessibility: The mechanism is designed to be easily accessible to all project workers, including both direct and contracted workers. Accessibility includes **physical proximity** as well as **linguistic clarity** to ensure all workers can understand and use the mechanism effectively.

Transparency: The process for raising and resolving grievances is visible, **clearly defined**, and **culturally appropriate and adapted** to the local context.

Confidentiality: Measures are **defined and implemented** to fully protect workers from any form of retaliation for using the grievance mechanism.

Timeliness: Specific **timeframes** are established within which grievances must be addressed and resolved.

Escalation: If a grievance cannot be resolved at the project level, it can be escalated to higher levels within the World Bank system for further review.

Multiple Channels: Workers can submit concerns through various channels, including designated email addresses, phone numbers, or physical locations such as grievance boxes.

Reporting: The Project Coordination Unit (PCU) is required to report on grievances, their resolution status, and response times in **quarterly reports** submitted to the World Bank.

Separate from Other Mechanisms: The Worker Grievance Mechanism operates separately from the Grievance Mechanism available to community members affected by projects, although there may be some **institutional overlap** in how the mechanisms are organized.

Project-Specific Mechanisms: Many projects, particularly those involving sub-projects, multiple locations, and diverse implementing organizations, may establish **project-specific grievance redress mechanisms** tailored to the specific context. However, these must operate within the framework of the general grievance mechanism established under the project.

World Bank's Grievance Redress Service (GRS): The GRS provides an avenue for individuals to submit complaints directly to the World Bank if they believe that a project is causing harm.

5 Establishment and Functioning of the Grievance Mechanism for Workers (GMW)

The establishment and functioning of the Grievance Mechanism for Workers (GMW) involves defining institutional responsibilities, developing procedures, and ensuring resources for effective operation. The Contractor, in coordination with the Project Coordination Unit (PCU), is responsible for creating and maintaining the GMW in compliance with the requirements of the World Bank's Environmental and Social Standards.

The GMW must be clearly communicated to all project workers and remain accessible, confidential, and responsive throughout all phases of the project. Procedures are set to ensure timely registration, assessment, and resolution of grievances, with appropriate measures to protect workers from retaliation.

6 Organization of the Grievance Mechanism for Workers (GMW)

As noted in the Introduction, the **Serbia Noncommunicable Diseases Prevention and Control (SNDPC) Project** is being developed and implemented across multiple locations and within several healthcare institutions. In addition, the implementation will involve a significant number of Contractors. For these reasons, the GMW for the SNDPC Project consists of **two interlinked components**.

The first, **general component**, is developed as the **Framework for the Grievance Mechanism for Workers (FGMW)**. This framework serves as a general guide, defining in detail the procedures and steps for submitting and resolving grievances and complaints, as well as ensuring protection for complainants from potential retaliation or reprisals. The second component

consists of Local Grievance Registers (LGRs) for each specific sub-project. These registers contain information about the respective healthcare institution, the Contractor performing the works, and other details relevant to the specific sub-project context.

The **Project Coordination Unit (PCU)** acts as the central body responsible for organizing and overseeing the functioning of the GMW. For each sub-project, a **Grievance Committee** and an LGR will be established, including authorized representatives of both the healthcare institution and the Contractor.

Any adjustments or modifications to the Local Grievance Registers must in no way diminish the rights or protective measures defined in the FGMW. All principles established under the FGMW are fully applicable, while differences may only relate to specific organizational or operational aspects of the healthcare institution or the works being undertaken. Any necessary modifications will be defined by the PCU in consultation with authorized representatives of the healthcare institution and the Contractor.

The grievance mechanism will remain operational **throughout the entire period of construction, expansion, reconstruction, and operation of the facilities**. Therefore, information about the existence of the GMW must be made available to project workers for the entire duration of these activities.

Each healthcare institution where works are being carried out will appoint its representative to the Grievance Committee. This representative will record grievances and complaints received either through a grievance box located at the entrance to the healthcare facility or sent to the facility's address, and will forward them to the designated representative within the PCU.

The PCU is responsible for receiving and resolving grievances during both the preparatory works phase and the construction phase of the project.

7 Specific Focus Areas of the Grievance Mechanism for Workers

In line with World Bank standards, particular attention must be given to the **prevention of sexual exploitation**, **abuse**, **and harassment (SEA/SH)** throughout all phases of project implementation, including preparatory works, construction, and operational activities.

Members of the **Grievance Committee** must receive specialized training to identify and recognize incidents related to **gender-based violence (GBV)**, **sexual exploitation**, **and harassment (SEA/SH)**. The grievance submission and review process must ensure **complete anonymity** for complainants. It is essential that all grievance-handling bodies fully respect the privacy of individuals who submit complaints. Every complainant has the right to request anonymous status, and the **Project Coordination Unit (PCU)** will ensure that the names and personal data of complainants are not disclosed without their explicit consent.

The Contractors and the PCU will implement a Workers' Grievance Mechanism fully compliant with World Bank ESS2. The Workers' Grievance Mechanism is substantively aligned with the requirements of the World Bank's standards on Labor and Working Conditions,

as outlined in the Guidance Note for Borrowers, Environmental and Social Framework for IPF Operations; ESS2: Labor and Working Conditions (2018), including provisions related to workforce protection, grievance procedures, and occupational health and safety (OHS). [Source: World Bank Guidance Note for Borrowers – ESS2: Labor and Working Conditions (2018). Available at: https://documentsl.worldbank.org]

Although the project's SEA/SH and GBV risks have been assessed as manageable, the Workers' Grievance Mechanism will, on a **precautionary basis**, be equipped to recognize SEA/SH and GBV-related grievances and to refer such cases to relevant national systems and services. A **survivor-centered approach** will be applied, ensuring absolute anonymity and confidentiality. Such grievances will be handled separately but will follow the same procedural steps and timeframes as outlined in the grievance admission and process value chain.

Particular care must be taken to ensure that **workers who may feel especially vulnerable**—including women, ethnic or religious minorities, migrant workers, younger workers, or workers with disabilities - are not deterred from lodging grievances. Therefore, the grievance process must be **confidential**, enabling workers to file complaints without others knowing.

It is also considered good practice to have **both male and female staff members** available to receive and handle grievances, so that workers can choose with whom they feel more comfortable speaking. Where language barriers exist, it may be necessary to provide written materials in multiple languages and to engage interpreters. Interpreters must be perceived as impartial and trusted by all parties involved.

8 Accessibility and Responsibilities in the Functioning of the GMW

8.1 Responsibilities of the Project Coordination Unit (PCU):

- The **PCU** will prepare an **Information Brochure** on the Grievance Mechanism for Workers (GMW).
- The GMW Information Brochure will be available on the Project Coordination Unit's website, along with other documents related to the **Serbia Noncommunicable Diseases Prevention and Control Project (SNDPCP)**.
- The PCU will formally notify all healthcare institutions involved in the SNDPCP in writing about the establishment and operation of the GMW, including the responsibilities of healthcare institutions for its effective implementation.
- The PCU will organize training sessions on the establishment and functioning of the GMW, as well as on the obligations of Contractors and healthcare institutions. Training will be scheduled in alignment with the project timeline and the start of works in healthcare institutions. These sessions may be conducted either online or in person.
- The PCU will establish a **Central Grievance Register**, in which all grievances forwarded from the Local Grievance Registers will be recorded, along with all relevant details. The PCU will request additional information from Local Registers if required data is missing.
- The PCU will appoint **two members** to the Grievance Committee.

- Workers employed under any individual sub-project may submit grievances or communications directly to the PCU at the following addresses:
 - Email address: grm.ncdproject@zdravlje.gov.rs
 - Postal address: Project Coordination Unit, Savski Venac Health Center, Pasterova 1, 11000 Belgrade, Serbia
 - o **Website:** https://www.zdravlje.gov.rs/ PKNBRS
 - o **Telephone:** +381 11 3606 412
 - o Responsible person in the PCU: Ksenija Petovar, Social Specialist
- The PCU will regularly update the Central Grievance Register to ensure public access to information.

8.2 Responsibilities of Contractors employing or engaging Project workers

Each Contractor engaged on the project is required to:

- Prepare and/or adapt the **Information Brochure** on the Grievance Mechanism for Workers (GMW) and print it in the necessary number of copies.
- Ensure that each project worker receives a printed copy of the GMW Information Brochure upon signing their employment contract.
- Appoint a representative to the **Grievance Committee** within **30 days** of signing the contract. The representative's responsibilities include full implementation of tasks defined under the GMW, and specifically:
 - Reporting any grievances received directly by the Contractor to the Project Coordination Unit (PCU) within two working days;
 - Maintaining a separate Local Grievance Register (LGR) that records all essential information as defined in chapter 8.5;
 - Providing responses and explanations regarding the facts and circumstances described in submitted grievances; and
 - Participating in meetings (online or in person) with PCU representatives as part of the Grievance Committee's activities.
- Organize training for project workers on their labor rights, during which the purpose and functioning of the Workers' Grievance Mechanism will be explained in detail.
- Additionally, ensure that training sessions inform workers about other obligations under World Bank ESS2, including the Code of Conduct, occupational health and safety requirements, proper use of personal protective equipment (PPE), and the prohibition of all forms of sexual exploitation and abuse or harassment in the workplace.
- Inform workers about obligations concerning the **respect and protection of nearby communities**, including residents living in the immediate vicinity of the project site, as well as patients and visitors to the healthcare facilities where works are being carried out.
- Post a **notice about the GMW**, along with accompanying documentation (including the Labor Management Procedures, printed copies of the GMW Information Brochure, and grievance submission forms), in a clearly visible location next to the grievance and suggestion box on the **notice board** at the construction site.
- Publish details on how grievances can be submitted within 30 days of contract signing.

• Ensure that information about the GMW is communicated to, and inclusive of, workers employed by subcontractors and suppliers.

8.3 Responsibilities of Healthcare Institution

If healthcare facilities (HCFs) directly assign staff to work in relation to the **Serbia Noncommunicable Diseases Prevention and Control Project (SNDPCP)**, such personnel will be recognized as **project workers** under the World Bank's Environmental and Social Standard 2 (ESS2). For these workers, each HCF will either establish its own **Grievance Mechanism for Workers (GMW)** in line with the project's requirements, or ensure that workers are able to submit their grievances directly to the **Central Grievance Mechanism managed by the Project Coordination Unit (PCU)**. This approach ensures that all project workers, including those engaged by HCFs, have access to an effective, confidential, and timely means of raising concerns related to their employment and working conditions during the implementation of the Project.

8.4 Record of Received Grievances

The Project Coordination Unit (PCU) will establish a Central Grievance Register (CGR) to record grievances that:

- 1. Are submitted in person by complainants to the authorized PCU representative;
- 2. Are communicated via telephone, email, or standard postal mail to the previously listed PCU contact details;
- 3. Are received from Contractors or healthcare institutions and forwarded to the PCU.

For matters requiring urgent resolution and/or support, a response will be provided within one day. All grievances and requests will be recorded within two working days and will be reviewed, assessed, and concluded within ten working days. Following this, corrective actions will be undertaken to address the root cause of the grievance. The outcome and resolution will be communicated to the complainant within ten working days of completing the grievance review process.

The use of the grievance mechanism does not limit access to other legal remedies.

Participants in the grievance process may initiate legal proceedings at any stage during the grievance procedure. Utilizing the grievance mechanism as a means of amicable dispute resolution within the Project does not prevent the complainant from exercising their legal rights before a court at any time during the process.

8.5 Data Recorded in the Central Grievance Register (CGR) maintained by the PCU and in Local Grievance Registers (LGR)

- Grievance registration number
- Date of grievance submission
- Healthcare institution / Contractor / Address / location where the grievance was submitted

- Method by which the grievance was submitted
- Contact information of the complainant (for grievances that are not submitted anonymously)
- Content and description of the grievance
- Persons responsible for resolving the issue
- Date of initiation of grievance investigation
- Date of completion of grievance investigation
- Results of the investigation into the grievance
- Information on proposed corrective actions to be communicated to the complainant (for grievances that are not submitted anonymously), including the date of communication
- Deadlines for taking action to resolve the issue
- Information on whether the proposed and implemented actions were satisfactory, or whether the grievance remains unresolved
- Date of closure of the grievance case
- Potential further actions required for grievances that remain unresolved

Steps in Resolving Received Grievances and Implementing Decisions

Step	Action	Description
Step 1	Submission of Grievance	A grievance may be submitted in person, by telephone, by letter, through a grievance box, or via email.
Step 2	Recording of the Grievance in the System	Once received, the grievance is recorded. The Contractor's representative prepares a report on the submitted grievance, including a description of its subject and content. This report is then forwarded to the Project Coordination Unit (PCU) monthly.
Step 3	Undertaking Actions Related to the Grievance	The grievance will be reviewed, its cause investigated, and measures to resolve the identified problem proposed. The analysis includes examining various aspects of the grievance. If necessary, confidential discussions may be held with relevant individuals to gain a clearer understanding of the matter. Additionally, further discussions with the complainant may be conducted (if the grievance is not anonymous) to gather additional information. The investigation phase should be completed no later than 10 working days from the date of receiving the grievance. Grievances related to occupational health and safety conditions must be resolved without delay.
Step 4	Resolution of the Grievance	A written response will be provided to the complainant within 10 working days of the decision being made (unless OHS concerned issues). If the grievance falls outside the scope of the Grievance Mechanism for Workers, the complainant will be

Step	Action	Description			
		informed that he/she may exercise his/her rights under the applicable legal regulations.			
Step 5	Verification	Before closing a grievance case, the PCU, in coordination with the Contractor and the healthcare institution, will verify that the grievance has been addressed and that the worker is satisfied with the remedy provided. If the complainant is not satisfied, further steps may be taken to seek resolution, or the complainant may pursue other legal remedies.			
Step 6	Closure of the Grievance Process	The details of its resolution are entered into the Central Grievance Register . In cases where a grievance has been submitted anonymously, a summary of the grievance and its resolution will be published on the PCU's website and on the Contractor's notice board at the worksite.			

9 Awareness raising and publicizing

Information on the Workers' Grievance Redress Mechanism will be disclosed through multiple accessible channels. Each worker employed or engaged under the Project, whether directly by health care facilities, the Project Coordination Unit (PCU), or by third-party contractors, will receive written information from their respective employing party detailing the procedures for raising grievances, the rights and protections afforded to workers, and available avenues for resolution.

Grievance boxes will be installed at each sub-project site to facilitate submission of complaints allowing uptake of anonymous grievances alike.

In addition, information about the Workers' GRM, including contact details and procedures, will be published on the official PCU website. These measures ensure that all workers are fully informed of their rights and have safe, confidential, and accessible means to raise workplace concerns without fear of retaliation.

Annex 1 - Grievance Submission form

WORKERS' GRIEVANCE SUBMISSION FORM Serbia Non-Communicable Diseases Project

(NCD Project)

This form is for use by any worker employed or engaged under the Serbia NCD Project who wishes to raise a grievance about working conditions, health and safety, employment terms, discrimination, harassment, or any other workplace issue. You may submit this form anonymously if you prefer. All grievances will be kept confidential and handled without retaliation.

1. Perso	nal Infor	mation						
(Option	al if you	wish to submi	t anonymously	·)				
• .	Gender: Job Title Name of Worksite Phone N	/Position: Employer/Co e/Sub-Project umber:	ontractor:					
		Grievance	olicable):					
Place of	f Incident	t/ Contract an	d specific loca	ation incl	uding the Heal	th Care	•	contract
Please	describe d). Attac	your grieva h any docum	nnce in detai ents or evidei	l (what nce if ava	happened, wh ilable:	ere, w	hen, and w	
Have □Yes □ No	you		reported		grievance			else?

If yes, please indicate to whom and any actions taken so far:						
3. Desired Outcome						
What action or resolution do you seek?						
4. Confidentiality and Consent						
Do you wish your identity to remain confidential? □Yes, keep my identity confidential. □ No, I agree to be contacted for further information. □ I confirm that the information provided above is true to the best of my knowledge. I understand that my grievance will be processed in accordance with the Workers' Grievance Redress Mechanism of the Serbia NCD Project, respecting confidentiality and the right to non-retaliation.						
Signature: Date:						
(Leave blank if submitting anonymously.)						
5. Attachments						
☐ Supporting documents attached (list or describe):						

INSTRUCTIONS:

- Submit this form to the designated grievance box at your worksite, or deliver it directly to your supervisor, HR representative, or the PCU
 Alternatively, grievances may be submitted online