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COMMUNITY GRIEVANCE MANAGEMENT PLAN

4	16/09/2016	Response to LSPs Comments	MFC	See attachment of reviewer's signature	
3	19/08/2016	Updated based on changes to project configuration	MFC	See attachment of reviewer's signature	
2	24/04/2015	Response LSP's Comments and Final for Issue	ERM	See attachment of reviewer's signature	
1	23/01/2015	Response LSP's Comments	ERM	See attachment of reviewer's signature	
0	30/12/2014	Issue For Review	ERM	See attachment of reviewer's signature	
REV.	DATE (dd/mm/yyyy)	DESCRIPTION	PREPARED	CHECKED	APPROVED

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3	Jirapol Kosolwadhana	HR Director	
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REVISION LOG

Rev.	Date (dd/mm/yyyy)	Revised Detail			
		Item	Page	Article	Description
0	29/12/2014	All	All	All	Issue for Review
1	23/01/2015	All	All	All	Response to LSP Comments
2	24/04/2015	All	All	All	Response to LSP Comments and Final for Issue
3	19/08/2016	All	All	All	Updated based on changes to Project configuration
4	16/09/2016	All	All	All	Response to LSPs Comments


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ACRONYMS


BRVT	Ba Ria Vung Tau
CGMP	Community Grievance Management Plan
CRL	Community Relations Liaison
CSR	Corporate Social Responsibility
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
GR	Grievance Resolution
GRO	Grievance Resolution Officer
GRU	Grievance Resolution Unit
HH	Households
HSSE&S	Health, Safety, Security, Environmental and Social
IFC	International Finance Corporation
LFDC	Land Fund Development Centre
LSP	Long Son Petrochemicals
PS	Performance Standard
RLR	Resettlement and Livelihood Restoration
SEO	Stakeholder Engagement Officer
SEP	Stakeholder Engagement Plan
SRAP	Supplemental Resettlement Action Plan
VTPC	Vung Tau People's Committee

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DISCLAIMER

It is upon the Contractor to solicit, acquire and comply with all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder.

The Contractor hereby agrees and acknowledges that the Employer makes no representation or warranty, express or implied, regarding the accuracy or completeness of any or all information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder. THE EMPLOYER HEREBY EXPRESSLY DISCLAIMS ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ALL RESPECTS, and the Contractor agrees that neither the Employer nor any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) shall have any liability to the Contractor or any of its affiliate(s), director(s), officer(s), employee(s), consultant(s), professional advisor(s), and duly authorised representative(s) in any way relating to those information, laws, rules, regulations, and Applicable Standards which is/are necessary and/or required for and applicable to the Contractor's performances of the works hereunder or the Contractor's or its affiliate(s)', director(s)', officer(s)', employee(s)', consultant(s)', professional advisor(s)', and duly authorised representative(s)' reliance thereupon and/or use thereof.

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1 INTRODUCTION

This document is the Community Grievance Management Plan (CGMP) for the Long Son Petrochemical (LSP) Complex (hereafter 'the Project'). LSP recognizes its responsibility to manage the impacts of its Project and therefore commits to developing a Project that is socially and environmentally sustainable.

The Project Environmental and Social Impact Assessment (ESIA) originally prepared in 2014 and subsequently updated in August 2016 identified a range of affected areas that may be significantly impacted, in particular during Project construction. Accordingly, the ESIA requires the Project to implement a number of environmental and social mitigation measures to manage these impacts. This CGMP is a detailed management plan that forms part of the Environmental and Social Management System (ESMS).

This CGMP outlines the process and requirements to be followed in handling community grievances, to ensure community concerns are responded to and managed appropriately. The plan specifically targets community concerns associated with the:

- Land acquisition process;
- Construction activities; and
- Broader community grievances associated with the presence of the Project.


1.1 OBJECTIVE

The key objectives of this CGMP are the following:

- Establish a process for receiving grievances from communities in areas affected by the Project;
- Outline a locally based process to transparently and efficiently facilitate the resolution of grievances;
- Establish clear documentation and recording processes for grievance management; and
- Clarify roles, responsibilities and organisational arrangements.

1.2 APPLICABILITY

This plan is applicable for the pre-construction and construction phase and thus should be understood and implemented by all parties involved in this phase of the Project. An update to this document will be required if significant changes in the

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Project plan occur, and prior to the commencement of the Project operation. This CGMP is owned by the LSPs Corporate Social Responsibility Department, who is responsible for its implementation.

1.3 SCOPE OF THIS CGMP


This document applies to community related grievances, focusing on the Long Son Commune community who will be affected by development of the Project. This CGMP does not replace the Vietnamese legal system as a form of recourse, which is always available to complainants at any time should they wish to pursue their concern through the court system.

Please note that the worker grievance mechanism is not within the scope of this document, this mechanism is outlined in the LSP HR Policy (LSP document reference forthcoming).

1.4 RELATIONSHIPS TO OTHER MANAGEMENT PLANS & DOCUMENTS

This document is prepared with reference to the following documents:

- LSP Environmental and Social Impact Assessment (ESIA): 2016.
- LSP Stakeholder Engagement Plan (SEP): 2016 (Ref: LSP-1S03-0006);
- LSP Supplemental Resettlement Action Plan (SRAP) (Ref: LSP-1S03-0005)
- HR Policy (LSP document reference forthcoming)

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2 LEGAL FRAMEWORK AND REQUIREMENTS

2.1 OVERVIEW

This document is prepared with reference to the 2012 International Finance Corporation's (IFC) Performance Standards (PS) to meet international requirements associated with grievance resolution, in addition to the obligatory Vietnamese government regulations.


2.2 VIETNAMESE REGULATIONS

The following regulations are relevant when considering a project's grievance mechanism:

1. *Law on Grievance and Denouncement 2011*; and
2. *Decree No. 43/2014/ND-CP* for land acquisition-related grievances, redress process and requirements.

However, there is no specific grievance mechanism for land acquisition-related grievances. According to *Decree No. 43/2014/ND-CP*, land acquisition-related grievances lodging follows the general grievance mechanism contained in the *Law on Grievance and Denouncement 2011*. This grievance mechanism includes the following:

- The complainants directly submit their first grievance to the authorities who issued the administration decision that they wish to complain against.
- If the grievance cannot be solved at this level, the affected person can put a second/ or third submission to higher administrative levels or the Court at the same or higher level, whichever level a Court is available. For example, Courts are not available at the commune level, therefore complainants will need to submit their grievances to district level Court.
- If the grievances are not resolved at the second/third submission level within the required resolution timeframe or the complainants disagree with the resolution, they can lodge grievances at a higher level Court as regulated in the Law on Administrative Procedures.
- For the first grievance submission, the timeframe for grievance resolution (from receiving complaints/grievances to resolution) is 30 days or up to 45 days for complicated cases. In the remote areas, due to difficulties on

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transportation, the grievance time can be extended to 45 days and 60 days for normal and complicated cases, respectively.

- The timeframe for the second/third submission is 45 days or up to 60 days for complicated cases. In remote areas, due to transportation difficulties, the grievance time can be extended to 60 days and 70 days for normal and complicated cases, respectively.

2.3 2012 IFC PERFORMANCE STANDARDS


The IFC PS1 (Assessment and Management of Environmental and Social Risks and Impacts) requires the Project to establish a community grievance mechanism to receive and facilitate resolution of affected communities' concerns and grievances related to the Project. The mechanism should be disclosed and clearly explained to the affected communities in the course of stakeholder engagement process.

In addition, the IFC PS require the following in addition to the above relative to grievance mechanisms:

1. PS4 (Community Health, Safety, and Security) - the Project will provide a grievance mechanism for affected communities to express concerns about the security arrangements and acts of security personnel; and
2. PS5 (Land Acquisition and Involuntary Resettlement) – the mechanism should be established as early as possible in the Project development phase. This will allow the Project to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve land acquisition-related disputes in an impartial manner.

Generally, the following requirements are expected in the implementation of a grievance mechanism:


- Scaled to the risks and adverse impacts of the project and have affected communities as its primary user;
- Seek to resolve concerns promptly, using an understandable and transparent consultative process;
- Culturally appropriate process;
- Readily accessible mechanism; and

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- At no cost and without retribution to the party that originated the issue or concern.

The IFC's Good Practice Note on Addressing Grievances from Project-Affected Communities emphasises these principles as basic design elements in a Project-level grievance mechanism.

Lenders often have independent mechanisms for affected persons to express their grievances (e.g., the Compliance Advisor Ombudsman for IFC and MIGA), once Lenders are confirmed, communities will be informed about any relevant Lender mechanisms.

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3 PROJECT OVERVIEW

3.1 PROJECT DESCRIPTION

The Project is considered as one of Vietnam's key projects. It is being developed to ensure an adequate feedstock supply for the development of the country's Petrochemical Industry; minimizing its dependence on imported products.

The Project is located in Long Son Commune of Vung Tau City in Ba Ria - Vung Tau (BRVT) Province, in the South of Vietnam. It is in an area of 464 hectares consisting of two main components; a production plant and seaport.

Overall, construction is scheduled to take approximately 51 months, while the operation period is expected to last 50 years or more. Construction will involve approximately seven main contractors during the peak period.


The workforce employed during the plant construction phase will consist of approximately 20,700 workers, and during the plant operation approximately 1,656 workers. It is intended that 5% of the workforce will be local workers from Long Son Commune, 10% from BRVT Province, 80% will be other Vietnamese workers, and the remaining will come from other countries such as Thailand. The worker camp will be established outside the Project site and will be the responsibility of the Engineering, Procurement and Construction contractor (EPC).

The roles and responsibilities of HSE&S management team during construction are outlined in chapter 22 Environmental and Social Management System of Long Son Petrochemical Complex in Vietnam Volume II: Environmental and Social Impact Assessment (ESIA).

3.2 SOCIAL SETTING

3.2.1 Project Affected Area

The ESIA identified three hamlets of Long Son Commune as directly affected communities i.e. Hamlet 2, Rach Gia Hamlet, and Hamlet 1. The Project land acquisition physically and economically affects a total of 391 households (HHs) in Hamlet 2 and Rach Gia Hamlet. Development of the Project resettlement site in Hamlet 1 affected 55 HHs; and 18 households were affected by the new cemetery development. The ESIA also identified a number of settlement areas in Hamlet 2 and Rach Gia Hamlet which will be affected by the Project construction activities.

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3.2.2 *Long Son Social Baseline*

Long Son is one of the administrative units of Vung Tau City which is known to have a significant role in Vietnam's offshore oil industry. Vung Tau is the most populated area in BRVT Province with a population density of 2,064 people per km². However, the population density in Long Son Commune where the Project is located, is lower; with about 167 people per km² with a total land area of 92 km² and a population of 15,300.


Agricultural and aquaculture dominate the Long Son economy along with the recent development of tourism. Over 45% of the communities in the three hamlets are engaged in agriculture based livelihoods, including fishing, aquaculture, and salt-farming. Meanwhile, a relatively low education level is reported; with most people in the three hamlets surveyed for the ESIA not finishing primary school.

It is reported that 99% of Long Son community is from the Kinh ethnic group who still preserve their traditional customs.

Consultation during development of the ESIA recorded a range of community concerns associated with the Project land acquisition and construction activities including:

1. Disagreement on the offered compensation value for assets;
2. Inadequate facilities in the proposed resettlement site;
3. Limited employment opportunities for locals;
4. Potential social and environmental impacts to air and water quality which could result in impacts to community health;
5. Livelihood impacts in particular related to fishing and aquaculture;
6. Environmental disturbance during construction (i.e. noise, dust) to Long Son Temple;
7. Unclear impact management responsibilities; and
8. Delays to the Project development.

In addition, the consultation also identified community expectations on the Project's positive impacts or benefits that may be unrealistic i.e. employment opportunities and implementation of a community development program.


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3.3 *ESIA OVERVIEW*

The ESIA has assessed a number of moderate to significant adverse impacts associated with the Project's land acquisition and construction activities. These impacts require appropriate management and include:

1. Impacts from land acquisition as a result of physical and economic displacement;
2. Impacts from Project vehicles and heavy equipment mobilisation;
3. Major impacts to air quality and greenhouse gas emissions;
4. Noise and vibrations;
5. Major impact to water quality associated with surface water runoff;
6. Moderate impacts to soil and groundwater contamination;
7. Impacts on terrestrial and coastal habitat; and
8. Influx migration impacts associated with workforce recruitment and the demand for provision of goods and services.

The ESIA also identified potential positive economic impacts from the Project through employment opportunities, provision of goods and services, and implementation of a community development program.

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4 GRIEVANCE TRACKING AND HANDLING PROCESS

4.1 OVERVIEW

The LSP Corporate Social Responsibility department disclosed the grievance mechanism to Project communities (in December 2014); and will continue to inform community members during regular engagement activities (see Section 5). The Project and its contractors and sub-contractors are expected to observe and/or implement the following stages in grievance tracking and handling to allow adequate coordination in resolving the grievances. The four stages are as follows:

- Stage 1: Receive and record (3 days);
- Stage 2: Review and investigate (7 days);
- Stage 3: Develop resolution and respond (15-30 days); and
- Stage 4: Close out and report (5 days).

Details of these stages are further described below.

4.2 STAGE ONE: RECEIVING AND RECORDING (3 DAYS)

The grievance ideally will be received by the Grievance Resolution Officer (GRO)/s at the Long Son Commune Grievance Office (established in 2014), during the pre-construction and construction phases. In addition, CSR department staff members can also receive and record grievances when working in the communities.

Detailed steps of receiving and recording are as follows and presented in **Figure 4.1**.

1. GRO and/ or CSR staff should provide clear explanation of the grievance handling process.
2. GRO logs the grievance using the Grievance Log Form (see 4.5.1) and ensures that it is captured in a Grievance Log (see 4.5.2) in order to monitor actions taken in resolving the grievance. All grievances received by CSR staff will be transferred to the GRO for recording.
3. The complainant receives a copy of their completed form (4.5.1).
4. GRO classifies the grievances and reports to the GR Lead to coordinate next steps.
5. The GR Lead reviews the grievance classification to determine next steps and reports to the CSR department Community Relations Manager.


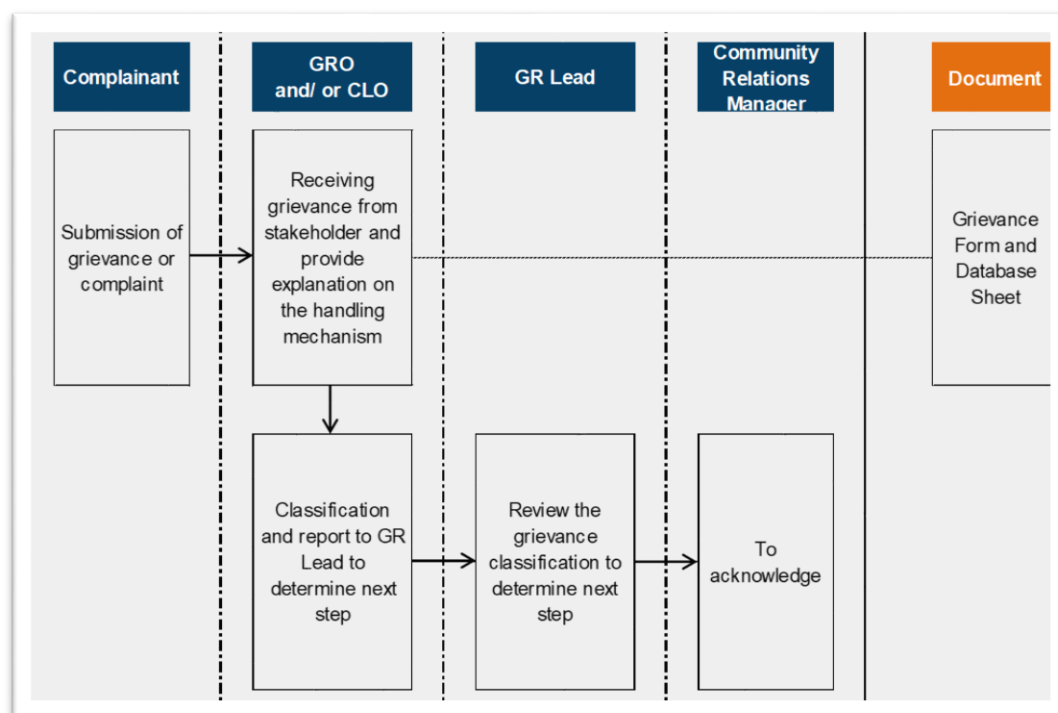
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Figure 4.1 **Receiving and Recording Grievance**




4.3 **STAGE TWO: REVIEW AND INVESTIGATE (SEVEN DAYS)**

In Stage 2, different approaches shall be undertaken for different type of grievances (see the following Sections 4.2.1 to 4.2.3) depending on if they are related to land acquisition, construction or other grievances. The investigation shall recommend a range of proposed actions to resolve the grievance. A grievance investigation form should be completed by the GRO accordingly (see 4.5.3).

4.3.1 **Land Acquisition Related Grievances**

For land acquisition and resettlement-related issues, the GR Lead will forward grievances to the Community Development and Livelihoods (CDL) Lead. The CDL Lead will review the grievances and record the nature and root causes of the grievances.

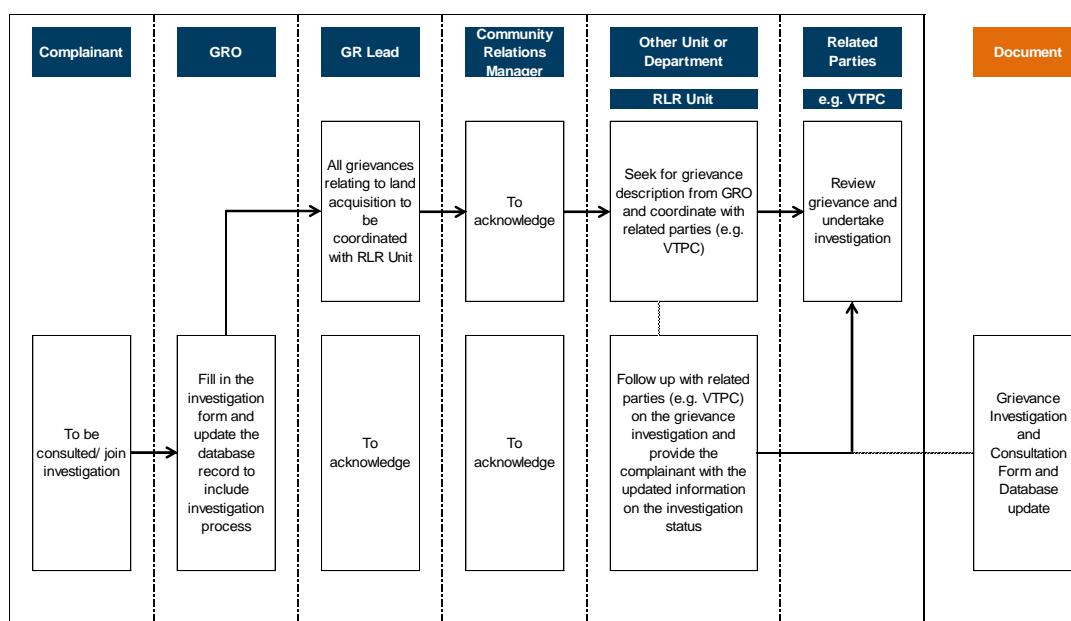
As compensation and resettlement is undertaken by local authorities (i.e. Land Fund Development Centre (LFDC), the Project is not authorised to resolve such grievances. Therefore, these grievances will be forwarded to Vung Tau City People's Committee (VTPC) and/or other related authorities, depending on complexity and times of submission, as the responsible party to investigate and develop resolution.

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An CDL Lead will be responsible to follow up with the VTPC about the investigation progress within a timeframe of seven days.

Figure 4.2 presents the steps to review and investigate land acquisition and resettlement-related grievances.

Figure 4.2 *Review and Investigation of Land Acquisition Related Grievances*




It is noted that complainants may still submit their land acquisition-related grievances directly to the local authorities (e.g., VTPC). Therefore, the GR team is required to record information on these grievances such as number and nature of grievance through the local authorities and record such information in the Grievance Log Form.

Engagement with the local authorities should be conducted to ensure they are aware of the Project Grievance Mechanism and to seek their collaboration.

4.3.2 *Construction Related Complaints*

For construction-related complaints, the GR Lead shall review and classify the significance and scale of grievances in order to determine the most adequate approach. These are categorized into two categories:

1. Low significance grievance, with characteristics:
 - The complaints relate to individuals ;
 - The grievance is a one-time issue (unlikely to reoccur); and

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- Does not require immediate intervention from managerial level.
2. High significance grievances, are indicated by the following conditions:
- The complaints involve a large group of affected people;
 - Has not been resolved during the time specified in this mechanism;
 - Recurring and could potentially affect the Project construction schedule;
 - Potentially attracting media attention; and
 - Requiring immediate intervention at managerial level.

The follow-up process is described in **Figure 4.3** below.


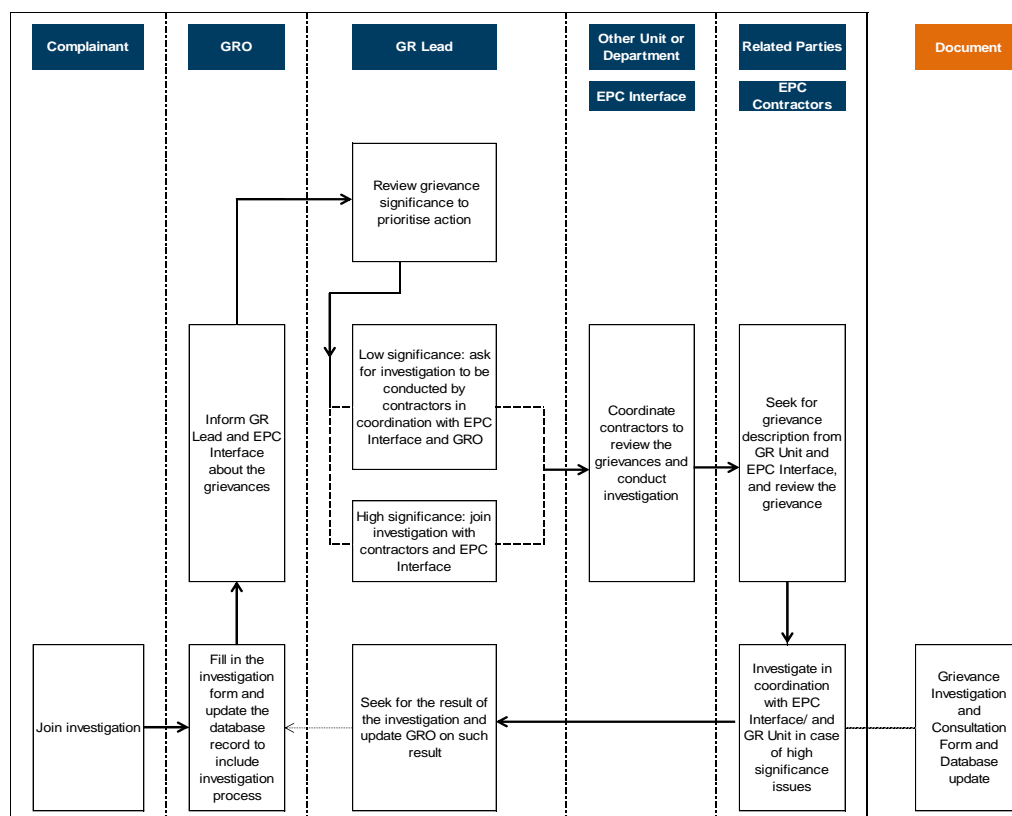
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Figure 4.3 *Review and Investigation of Construction Related Complaints*



The main provisions to be observed at this stage are:

- In the event that the grievances are assessed as low significance, direct interaction between the GRO and EPC Interface and contractors will be conducted;
- For high significance grievances the GR Lead will coordinate with relevant parties' and Management to undertake a joint investigation; and
- In the case of high significance grievances a Grievance Committee can be convened. Members of the Grievance Committee include representatives of the CSR Department, contractors and other relevant parties. A joint investigation of these parties will be undertaken within a seven-day timeframe.

4.3.3 Others

Other type of grievances which require coordination with other Units, Departments or external parties should be reported to the Community Relations Manager, who will then appoint or lead coordination with the most appropriate relevant party, as described in **Figure 4.4**.


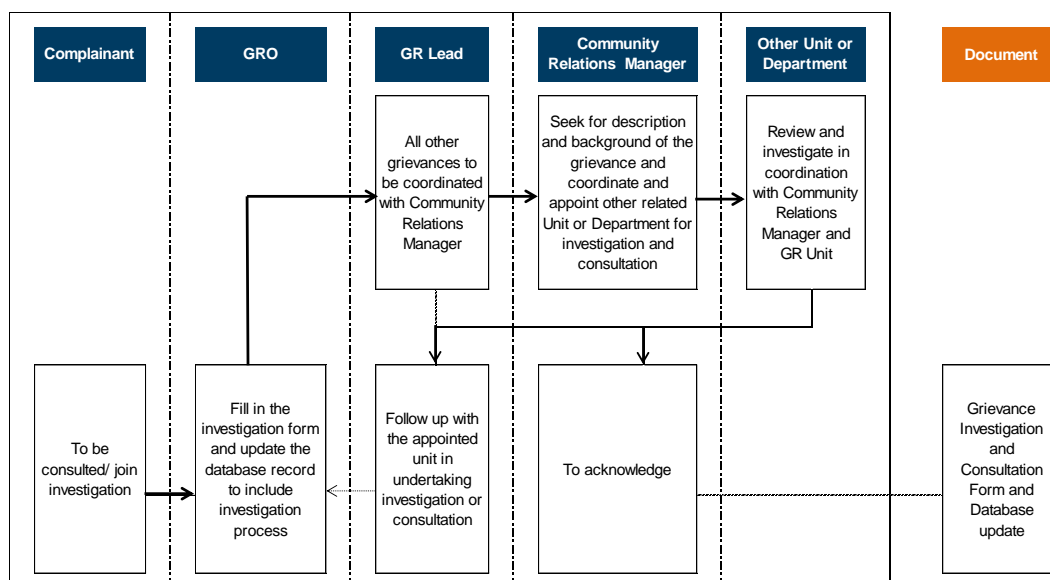
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Figure 4.4 **Review and Investigation of Other Grievances**



4.4 **STAGE THREE: DEVELOP RESOLUTION AND RESPOND (15 TO 30 DAYS)**

A range of proposed resolutions will be recommended based on the joint investigation. Should the complainants agree with the proposed resolution, it should be implemented accordingly within the 30-day timeframe.

The GRO will ensure the complainant(s) is provided with updated information on the implementation of the resolution (**Figure 4.5**).


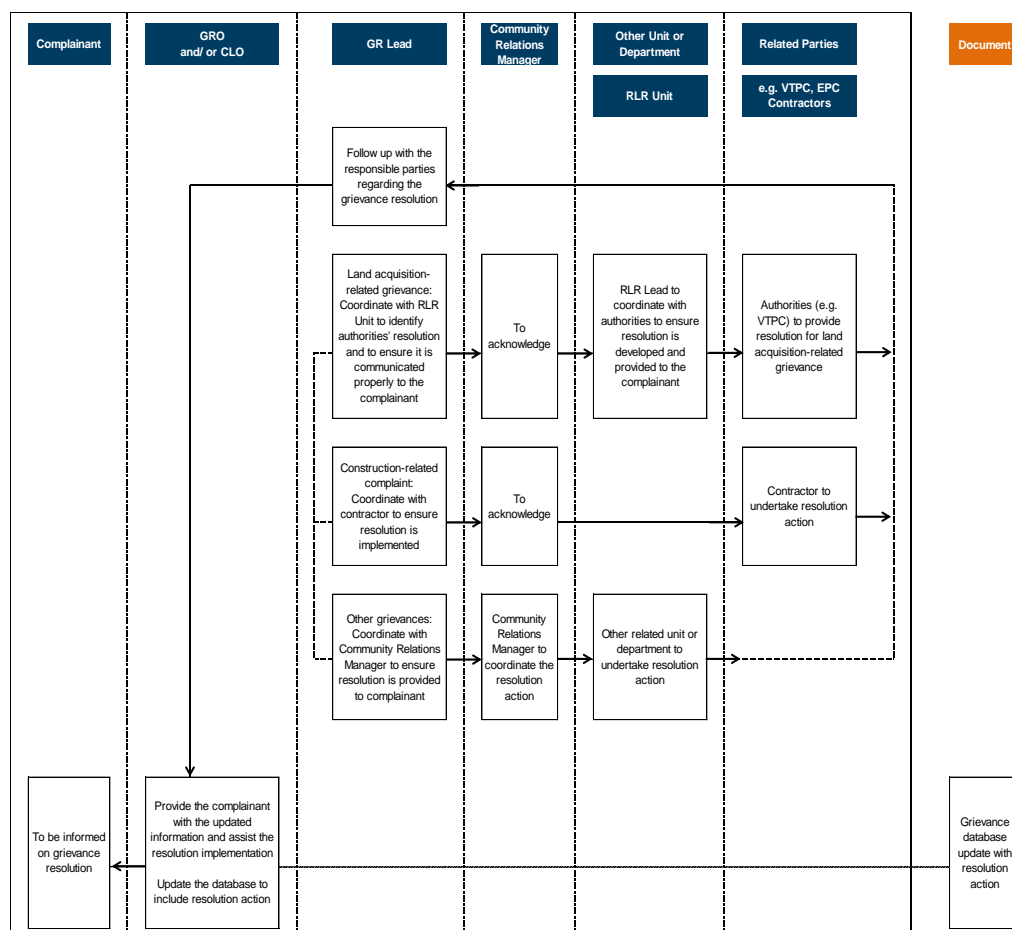
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Figure 4.5 Develop Resolution and Respond



4.5 STAGE FOUR: CLOSE OUT AND REPORTING (5 DAYS)

Prior to the implementation of the proposed resolution, the GRO are responsible for seeking the complainant responses/feedback on the solutions. Different approaches to close out the grievance cases will be applied, depending on the feedback, as follows:

- If the solutions are not accepted by the complainant(s), the GR Lead will conduct consultation with the complainant(s) to obtain further detailed clarification on the issues and to try and agree upon a mutual solution. Minutes of the consultation session shall be documented and recorded in the database (see 4.6.3);
- If a mutual solution cannot be obtained through consultation, third parties will be involved. The third-party will provide advice or facilitation in a way that is acceptable to all parties. The process will refer back to Stage 2; and

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- Should the complainants agree and accept the provided resolution, the GRO will record the agreement in a Grievance Resolution Minutes Form (see 4.6.4), and will update the database and keep all documentation in one central place as required.

This is the termination of the grievance resolution of the Project. Should the complainants still disagree with the provided resolution, they can refer their grievance to the Vietnamese legal system. It should be noted that complainants can refer their grievance to the Vietnamese legal system at any time.

Detailed steps to be observed to close out the grievance case are described in **Figure 4.6**.


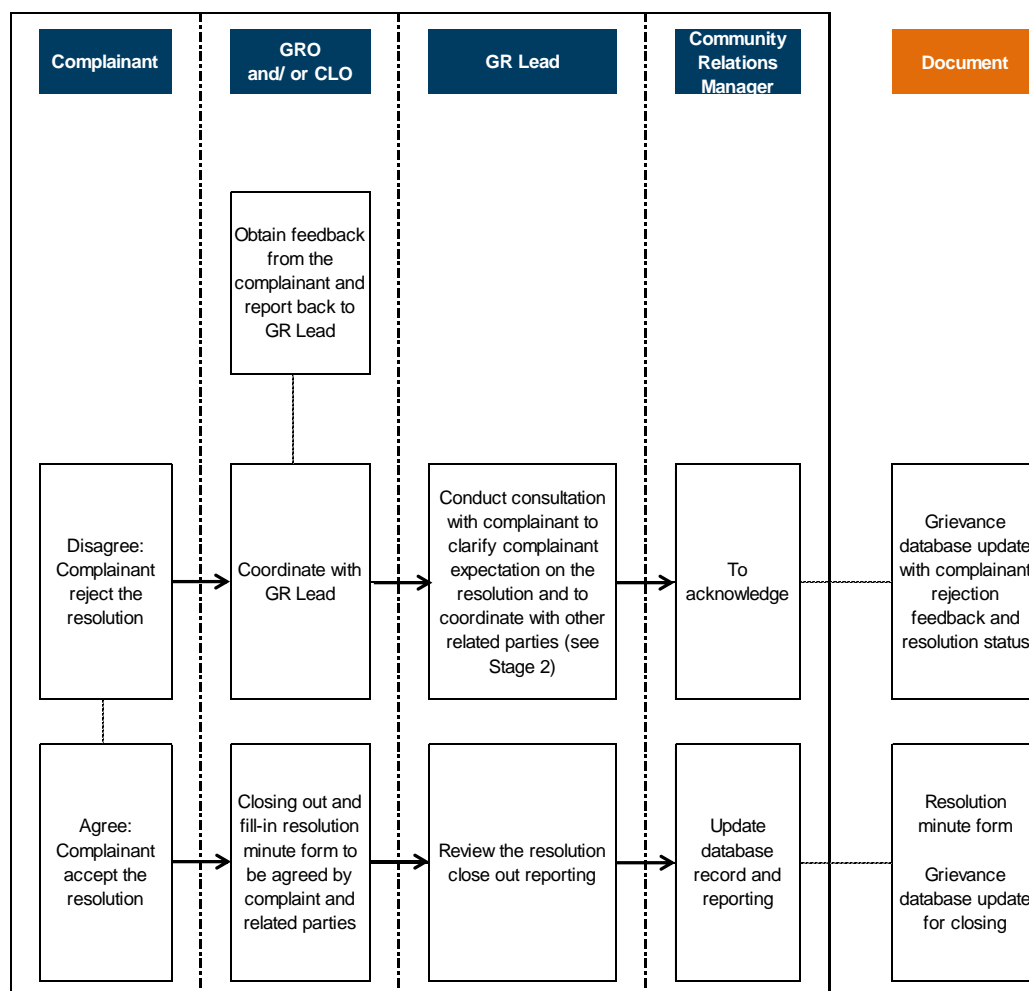
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Figure 4.6 Closing Resolved Grievances



4.6 DOCUMENTATION

4.6.1 Grievance Form

The following grievance form shall be filled in for every grievance received, by the Project Representative. The complainant will be given a copy of the completed form.



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Table 4.1 Grievance Form

Grievance Form		
Date		
Reference Number		
Full Name		
ID Number		
Contact Information	Address	
	Phone	
Content of Grievance or complaint	Description	
	Location	
Consent to disclose the grievance information to third parties	<p>I am aware that this grievance is submitted to the LSP Project; however it may refer to actions of third parties, (for example, contractors of LSP Project). I understand that in order to efficiently resolve my grievance, the Project will have to contact these third parties so as to examine the facts stated in the grievance and develop a resolution.</p> <p>I hereby agree that the LSP Project can disclose this grievance (as well as additional information related to this grievance) to third parties.</p>	
Signature of complainant		
Received by	Name	
	Signature	
Status of grievance	Investigation	
	Resolution	
	Complainant feedback	
	Close out reporting	
Office Use Only	Category	
	Significance	

4.6.2 *Grievance Log and Database*

All received grievances shall be kept and recorded in the grievance database by the GRO. Data should be entered the same day the grievance is received (see Table 4.2 below) and updated with new information as the grievance progresses. It is anticipated that the Project will move to an information management system (IMS)

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in the lead up to construction at which time LSP may choose to log grievances in a similar manner to (Table 4.2) into an online confidential database.

Table 4.2 *Grievance Log Book and Database Form*

Grievance Form No	Log Date	Complainant			Grievance				Update Status and Date of Implementation				Remarks
		Name	Address	Phone	Category ^a	Significance ^b	Description	Location	Investigation	Resolution	Complainant Feedback	Status ^c	

Note:

a: land acquisition-related grievance/ construction-related complaint/ other

b: low significance/ high significance for construction-related complaint

c: status could be unsolved, pending, resolved, closed

4.6.3 *Grievance Investigation and Consultation Form*

The investigation and consultation process will be recorded by the GRO/and or Community Relations staff in the form below and kept in the database by the GRO.


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Table 4.3 **Grievance Investigation and Consultation Form**

Grievance Investigation and Consultation Minutes				
Date of investigation				
Reference Number				
Full Name				
Grievance investigation and consultation	Description			
	Proposed Resolution			
Statement to accept the grievance resolution and close out the case	<p>The grievance investigation and consultation undertaken involved the complainant, other affected people, and relevant parties.</p> <p>The following resolution is proposed:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>This record is made with the related parties to demonstrate investigation and consultation have been undertaken.</p>			
Signature				
Agreed	Acknowledged	Acknowledged	Acknowledged	Others
_____	_____	_____	_____	_____
(Complainant)	(GR Team)	(Related Unit/ Department)	(Related External Parties)	(Name)

4.6.4 **Grievance Resolution Minutes**

Once the resolution is implemented, the resolution minutes form will be filled in by GRO. The GRO will update and close out the grievance in the database.



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Table 4.4 **Grievance Investigation and Consultation Form**

Grievance Investigation and Resolution Minutes				
Date of resolution				
Reference Number				
Full Name				
Grievance description	Description (what, when, where, and who)			
	Resolution implemented			
Statement to accept the grievance resolution and close out the case	<p>Resolution for the grievance has been provided based on the investigation involving the complainant, other affected people, and relevant parties at _____ (date).</p> <p>The following resolution has been agreed and implemented:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>This minute is made and agreed with the related parties. Thus the grievance is considered resolved and closed.</p>			
Signature				
Agreed	Acknowledged	Acknowledged	Acknowledged	Others
_____ (Complainant)	_____ (GR Team)	_____ (Related Unit/ Department)	_____ (Related External Parties)	_____ (Name)

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5 DISCLOSURE OF THE GRIEVANCE MECHANISM

The disclosure and communication of the grievance mechanism has commenced, with the establishment of the LSP Long Son Commune Grievance Office and will continue on an on-going basis as grievances arise. The mechanism was also disclosed again to affected households as part of ESIA disclosure activities in August 2016. It will be disclosed in a culturally appropriate manner in the local language and format that is understandable to all.


The following information will be disclosed:

1. To what extent the mechanism is capable of delivering;
2. Who can raise complaints – focusing on affected communities;
3. Where, when, and how community members can lodge complaints;
4. Who is responsible for receiving and responding to complaints, and if any external parties can receive complaints from communities;
5. What type of responses complainants can expect from the Project including timing of responses; and
6. The benefits that complainants can receive from using the grievance mechanism.

The following approaches will be used in disclosing the mechanism:

- Direct communication in group discussions, community meetings and through the Community Relations staff;
- Posters or billboards will be erected in the hamlet centre and Long Son People's Committee office; and
- Community radio.

It is essential that the local government also fully understand the mechanism to enable them to communicate the step-by-step process to those affected, particularly in the case where the grievances are submitted to them for resolution.

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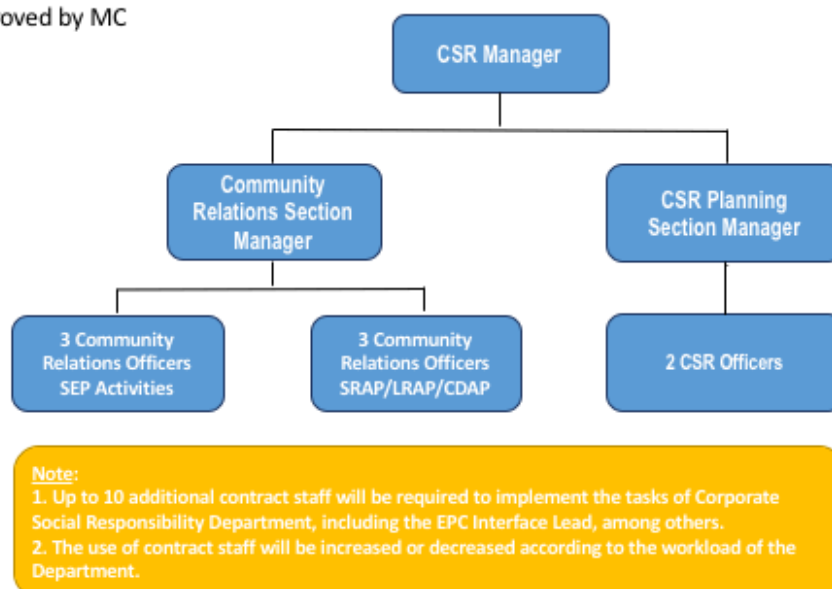
6 ORGANISATIONAL ARRANGEMENT

6.1 ROLES AND RESPONSIBILITIES

The responsibility of the grievance mechanism falls under the GR Unit; a Task Unit under the LSP Construction CSR Department (**Figure 6.1**).

Figure 6.1 Community Grievance Mechanism Organisation Structure (Construction)


As approved by MC



Specific roles and responsibilities of Project employees involved in the implementation of the grievance mechanism are detailed in the below table.

Table 6.1 Roles and Responsibilities for the Grievance Mechanism


No	Roles and Responsibilities
A. Community Relations Manager	
1	Lead collaboration with LSP Construction HSSE&S Team to establish and implement the Project Grievance Mechanism for construction phase
2	Ensure the social-related commitments in the HSSE&S Policy are applied
3	Manage the grievance mechanism monitoring and audit as required
4	Report to Management and Lenders on social issues and grievance resolution implementation progress
B. Community Relations Officer as GR Lead	

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No	Roles and Responsibilities
1	To manage the implementation of grievance mechanism as required
2	To collaborate with other related units or departments (e.g., RU) and external parties (e.g. Contractors) in resolving grievance
3	To coordinate GR Team in preparing proper documentation of grievance and its resolution
4	Lead the grievance mechanism monitoring and report to the Community Relations Manager and other relevant parties as required
C. GRO	
1	To observe the steps required in tracking and handling grievances
2	To receipt, record and log grievance properly as required
3	Support GR Lead in communicating with stakeholders and complainants
4	Support GR Lead in coordinating with contractors and other related parties as requested
5	To ensure proper documentation and database update of grievance and its resolution
6	To prepare periodical grievance reporting
D. Community Relations Officers	
1	To observe the steps required in tracking and handling grievances
2	To receipt and record grievances properly as required
E. Other Community Relations Units or Department	
1	To acknowledge and be familiar with the grievance mechanism as part of managing the Project social risk
2	In collaboration with GR Unit to review, investigate, and resolve grievances as relevant and required
3	Coordinate with external related parties (e.g. VTPC) to support grievance resolution
F. EPC Contractors HSSE&S Representatives	
1	To acknowledge and be familiar with the grievance mechanism as part of managing the Project social risk, and to observe the steps required in tracking and handling the construction impact-related grievances, as required by the Project
2	In collaboration with GR Unit to review, investigate, and resolve grievances as relevant and required
3	Support the Project in establishing good relationship and communication with its stakeholders

6.2 **ENHANCING CAPACITY**

As of August 2016, one GRO has been recruited locally, e.g., a credible respected community figure with non-biased knowledge and understanding of community customs and traditions.

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A training and capacity building program for the GRO and/ or other officer level CSR staff will be implemented to improve their knowledge and skills in implementing the grievance mechanism.

The capacity building program will include at minimum the following components:

- The LSP HSSE&S policy and values;
- The HSSE&S site induction and awareness for officers as their scope of works will require frequent visits to the Project site areas;
- Induction on the Project grievance mechanism;
- Effective communication to appropriately disclose the Project procedure in handling grievances to community and engagement with the Project related stakeholders;
- Technical training for recording and documenting grievances, investigation, and agreeing resolution; and
- Soft-skills training, e.g., communication and leadership.


6.3 **CONTRACTOR MANAGEMENT**

It is LSP's responsibility to manage the implementation of this plan and to ensure the Project's contractors (i.e., Engineering, Procurement, and Construction – EPC Contractors) are familiar with this mechanism; ensuring adequate coordination in resolving genuine grievances.

The contractors are required to observe and implement a range of measures as specified in this plan. To manage this, the Project will, where necessary as in the case of multiparty issues or complex grievances, resolutions should be discussed within the Grievance Committee. The following parties are expected to attend the Committee:

1. GR Lead;
2. CSR Department EPC Interface;
3. LSP Construction HSSE&S Manager;
4. EPC Contractors HSSE&S Manager/Site Manager; and
5. Community Relations Manager, when required.


Depending on the grievance submission status, regular meetings of members of the Grievance Committee can be set up (e.g., monthly).

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The main agenda of these meetings will be to discuss:

- New grievance received;
- The resolution status – number of grievances resolved verses unresolved, along with challenges in implementing the resolution; and
- Identify trends and repetitive grievances and outstanding/overdue grievances.

This CGMP shall be disclosed to the EPC Contractors prior to signing the EPC Contract. A provision on collaboration between LSP and the EPC Contractors in grievance resolution should be developed and included in the EPC Contract to ensure commitment of contractors to cooperate with LSP for grievance resolution.

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7 PERIODIC MONITORING AND REPORTING

7.1 MONITORING AND REVIEW

This section expands a range of requirements for internal and external monitoring to evaluate the effectiveness of the grievance mechanism implementation.

Internal monitoring conducted as part of GR Lead roles and responsibilities will be undertaken on a regular basis. Meanwhile, external monitoring will be undertaken quarterly to reconfirm the internal monitoring results.

The scopes of the monitoring include:

- Assess the effectiveness of the grievance tracking and handling procedure;
- Identify the need for organizational improvement in implementing the procedure;
- Evaluate the progress of resolution implementation and identify intervention needs from senior management to manage overdue/outstanding cases or recurring grievances; and
- Identify the need for improvement of the procedure, should any significant changes in external factors occur, e.g., economic and political conditions which potentially encourage additional social risk and impact.


In addition, the external monitoring will also be undertaken to identify the mechanism compliance with the national regulation, IFC expectations, and the Project's internal policy.

7.2 REPORTING

Periodic reporting will be prepared by the GRU with the following timeframe:

- Monthly reporting will be submitted to Community Relations Manager as a reference in the coordination meeting with the Contractors HSSE&S Team; and
- Quarterly data to be submitted to CSR Manager and compiled in external social management report and distributed to other parties as required (e.g., Project Director and Lenders).

Content of the report, relative to grievances will at minimum contain the following information:

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- A summary of the grievances received and classification based on the grievance type within the timeframe;
- The resolution status - number of grievances resolved, pending of implementation and unresolved, along with challenges in implementing the resolution, and timeframe to resolve the remaining grievances;
- Results of monitoring and the status of implementation of the proposed recommendation; and
- Identify trends and critical grievances occurring regularly or overdue cases.