



University Grants Commission

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**GRIEVANCE REDRESS MECHANISM (GRM)
FOR
ADDRESSING ENVIRONMENTAL AND SOCIAL SAFEGUARD ISSUES**

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1. BACKGROUND

The Government of Nepal (GoN) has formulated and established the National Higher Education Program (NHEP) 2021/22 – 2025/26 for the development of the higher education sector. The University Grants Commission (UGC), Nepal, has instigated the Nurturing Excellence in Higher Education Program (NEHEP) to support NHEP initiatives in the following result areas:

- Improving employability, entrepreneurship, and collaborative research;
- Strengthening governance and financing of higher education;
- Widening access to quality higher education; and
- Extending digitization of higher education.

The objective of the program is "to strengthen labor market relevance and quality of higher education, boost collaborative research and innovation, and enhance equitable access for underprivileged and disaster-affected groups".

UGC, with the support of the World Bank, is implementing NEHEP with a focus on reforms in areas such as enhancing institutional capacity-building, effective monitoring and timely reporting of compliance and non-compliance, and allocating adequate human resources and budget. Another crucial focus area is raising the stakeholders' awareness and capacity to properly manage and implement the Environmental and Social Safeguard, for which the program aims to provide necessary support to the stakeholders and the beneficiaries of Higher Education Institutes (HEIs). The guideline will follow the national legal framework and international good practices for the effective implementation of GBV and SEA/SH-related issues.

Establishing and strengthening a Grievance Redressal Mechanism (GRM) has been identified as one of the central components for achieving the targeted objectives, including environmental and social safeguards. This document provides the existing scenario regarding GRM at UGC and outlines the plans for improving and strengthening it during the program period.

2. STRUCTURE

2.1 Before NEHEP

UGC successfully implemented the Second Higher Education Project (SHEP) and the Higher Education Reforms Project (HERP). During the HERP implementation period (2015-2020), UGC formed an expert committee specifically working on environmental and social-related issues because of the lack of a dedicated division or unit and human resources at UGC. As such, in the absence of a separate unit for handling GRM, the various complaints received at UGC were collected and discussed with the concerned staff and division heads, and necessary actions or decisions were taken by the executives.

2.2 During Implementation of NEHEP

The UGC Board has established an Environmental and Social Safeguard Committee. The E & S Committee is headed by the Chairman of UGC and includes four experts from the environmental, engineering, and social fields, as well as a staff member of UGC who has been working as the focal person. This is a committee that was formed during the HERP implementation period, and now it is continuing. There is one safeguard team also comprising an Environmental Expert and a Social Safeguard Expert in UGC who are responsible for implementing, monitoring, and reporting

safeguard activities in beneficiary HEIs. The Committee and Safeguard Experts aim to regularly facilitate the development/establishment of a GRM unit and E & S unit/focal person, both at the UGC as well as at the beneficiary HEIs during the project period.

A structured GRM has been established to ensure the timely and effective management of grievances and complaints submitted from relevant ministries, agencies, institutions, or stakeholders. This mechanism is designed to facilitate transparent and impartial handling of all concerns, and is comprised of key officials, including the Chairman, the Secretary, and the head of administration, as well as other designated officials, who collectively oversee the process. The aggrieved persons/entities can file a grievance through the complaint box, by telephone, toll-free, hotline, SMS, or in person at UGC or concerned HEIs. The information of the GRM committee at the UGC has been made public through the UGC website, the digital citizen charter, the UGC notice board, and through radio and newspapers periodically.

If any SEA/SH or GBV-related case is registered, then the GRM committee will handle it, ensuring the safety, security, and confidentiality of the survivor. The GRM committee will follow the case-handling process as mentioned in the GRM flow chart (below Point 8, Figure 1).

2.3 Future Plans

There is a functional GRM at UGC, and besides that, there is an E&S committee and Safeguard unit (Environmental and Social Safeguard Experts) with an E&S focal person. The environmental and Social Safeguard activities will be implemented effectively in the beneficiaries' HEIs by providing regular technical support, orientation, training, and documentation. The E & S committee and safeguard experts will regularly monitor the E & S activities of HEIs and will periodically report to the World Bank.

3. SCOPE

The program will strengthen the GRM system to ensure the systematic handling of any grievances received. The mechanism is designed to ensure that all complaints received by the Commission or HEIs are processed under established procedures, guaranteeing due consideration and the implementation of appropriate actions. The functioning of this grievance redressal system is systematically outlined and clarified in Figure 1 (see point no. 5), which provides a visual representation of the process and its steps. In line with the established framework, various universities and higher educational institutions are also required to set up similar grievance redressal mechanisms and ensure the effective implementation of the process. The GRM note will follow the terms and conditions mentioned in the CoC of SEA/SH (2022) of UGC-NEHEP. The guideline will be disclosed on the UGC website for public access and will inform all beneficiaries of HEIs.

4. STEPS OF GRM

The Steps of GRM are as follows:

- i. Receive and register all grievances (Collection)
- ii. Review and investigate grievances
- iii. Consultation and discussion
- iv. Develop resolution options
- v. Address/respond to grievances
- vi. Appeal to the Court

The GRM will include the following steps:

- i. **Receive and register all grievances (Collection):** Grievances may be received either orally or in writing through email, telephone hotlines/toll-free numbers, and SMS. The

program staff involved in handling grievances or other staff who have direct contact with affected communities may also register complaints. They may file the complaint anonymously.

- ii. **Review and investigate grievances:** This step includes the compilation and categorization of the received complaints depending upon their nature and complexity. Afterwards, the focal person validates the complaint and arranges for an investigation by concerned units or departments within two weeks.
- iii. **Consultation and discussion:** Grievances will be categorized based on the nature of the event. Immediate action will be taken in the case of Gender based violence (GBV)/SEA/SH. The focal person refers the survivor to relevant mapped GBV service providers in the area, as mentioned in 4.1.
- iv. **Develop resolution options:** The focal person brings the issue to the committee for addressal options and deliberations within two weeks.
- v. **Address/Respond to grievances:** The committee addresses the grievances, and the focal person communicates to the survivor, advising of findings and the outcome within twenty-four hours.
- vi. **Appeal to the Court:** If the grievance remains open or the person is not satisfied with the decision of the GRM committee, then the survivor will have the option to appeal to the court.

4.1 For SEA/SH cases

In the case of SEA/SH-related GRM, the project will consider the following process:

- i. Designate a Gender-based Violence (GBV)/E & S Focal Point in the UGC and every HEI that will receive, acknowledge, and file cases. All GBV/E&S focal points will receive training on survivor-centered approaches, handling disclosures sensitively, and ensuring referrals are based on informed consent

SEA/SH-related complaints can be received using a regular project-level GRM channel, such as mail, text message, email, website, telephone, suggestion/grievance box, or through the service provider. The GBV/E & S Focal Points (in all the project HEIs) will receive, record the complaint, and only upon the survivor's informed consent will the complaint be referred to the relevant GBV service provider in the area (identified in advance) for further management of the case and appropriate support to the survivor. Grievances will be registered and recorded with minimal information, including (1) the allegation in the survivor's own words; (2) if the alleged perpetrator is related to the project; and, if possible, (3) the age and sex of the survivors.

- ii. Conduct a mapping of GBV service providers in the areas where project HEIs are based. The HEIs will have a list of all the relevant GBV service providers in the area for referral purposes when the SEA/SH cases are filed. Each HEI must maintain an up-to-date referral directory that includes contact information, service capacity, and kind of services provided by each provider.

The GBV/E & S Focal Points will immediately, within 24 hours refer the cases to appropriate GBV service providers specializing in health, shelter, and psychosocial counselling within their scope and also refer the survivor to other relevant organizations working on GBV (for

legal support as per GoN guidelines) if needed. Only with the survivor's informed consent to proceed with accountability processes can the GBV service provider represent the survivor and support her/him throughout until the case is closed.

- iii. Appoint UGC GRM for the monitoring of all the HEIs' SEA/SH grievance cases. The UGC will closely and regularly coordinate with the HEIs and will update them on the status of the case. The UGC GRM Committee will also close the cases received. The UGC GBV/E&S Focal Point will track follow-up with service providers—without accessing personal case details—to ensure survivors receive the services they were referred to.

5. INFORMATION SHARING OF SEA/SH GRIEVANCES

With the written and informed consent of the survivor, the HEI will report minimal information around (1) the nature of the case; (2) if the case is project-related; (3) age and sex of survivor (if available); and (4) if the survivor received/was referred to services (WB SEA/SH GRM note, 2020) to the UGC GRM GBV/E & S Focal Point. The UGC will then provide the same minimal information to the Bank task team leader. At the same time, the GBV/E & S Focal Point within each HEI will also maintain communication and information-sharing mechanisms with the GBV Service Provider, mainly on the status of the case and support provided to the survivor. Survivor's identity will never be disclosed without consent, and reports/information will focus only on aggregate data to protect privacy.

6. MONITORING AND REPORTING

The GBV/E & S Focal Point within the HEI GRM committee is responsible for monitoring the response measures and maintaining close communication and coordination with the UGC GRM GBV/E & S Focal Point. Each HEI GRM GBV/E & S focal point will submit a monthly progress report to UGC, with no personal details disclosed about the survivors but on the number of cases managed and the kind of services provided. The Monthly Progress Report (MPR) should include:

- the number of project-related SEA/SH complaints received and/or referred by the grievance mechanism disaggregated by age and sex
- the number of open cases and the average time they have remained open,
- the number of cases closed and the average time they had remained open, and the closed-out time
- the number of survivors accepting referral to GBV services for the reported incident, and the number of survivors who did not

7. DISCLOSURE OF SEA/SH GRIEVANCE REDRESS MECHANISM

Information on the SEA/SH redress mechanism will also be an integral part of the overall project GRM dissemination, such as providing information on where and how survivors can submit their complaints/grievances. HEIs are also required to disseminate GRM provisions, including the SEA/SH mechanism, through appropriate channels. Dissemination must include survivor-centered messages clarifying that SEA/SH

complaints can be made safely and confidentially and that support services are also available.

8. GRM FLOW CHART

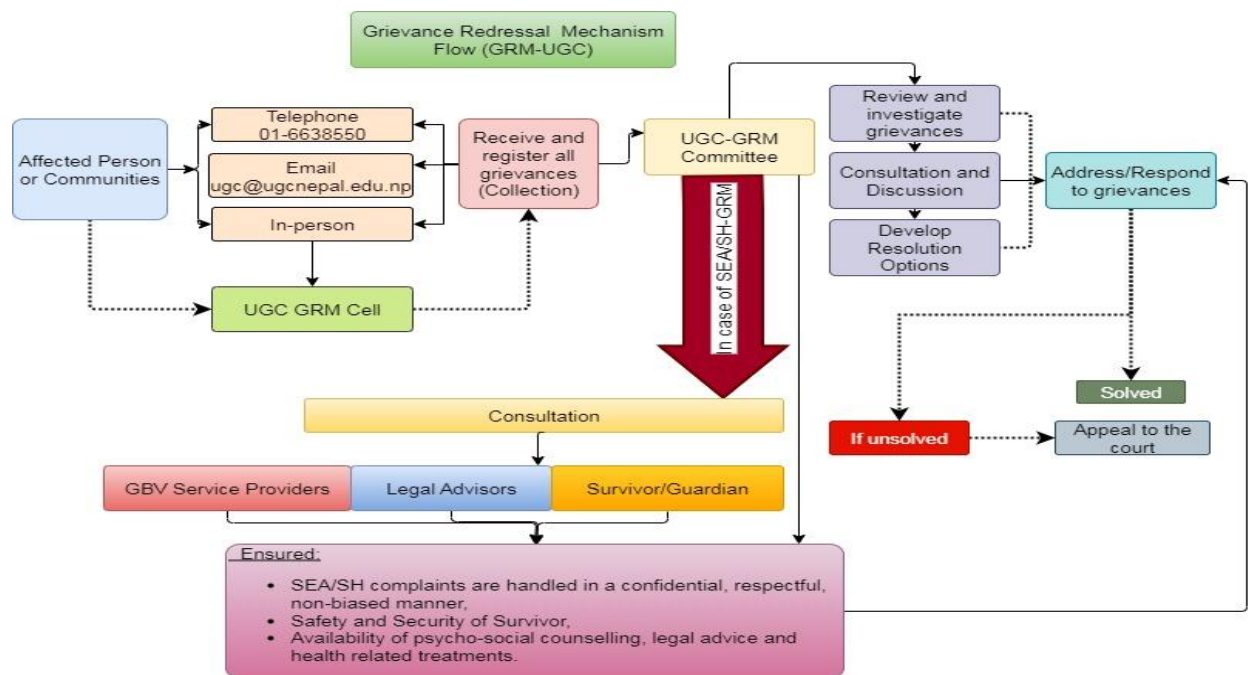


Figure 1: GRM Flow Chart

The chart illustrates the Grievance Redress Mechanism (GRM) flow for the University Grants Commission (UGC). It outlines the process through which affected persons or communities can submit grievances via multiple channels, including telephone, hotlines, toll-free numbers, SMS, and in-person reporting to the UGC GRM Cell. The grievances are then received, registered, and forwarded to the UGC-GRM Committee, which reviews, investigates, consults, and develops resolution options. If a grievance is addressed, it is marked as solved; otherwise, it may lead to an appeal to the court. A special case is made for Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) grievances, where a separate process ensures confidentiality, safety, and access to psycho-social counseling, legal advice, and health-related treatments through survivor support services, legal advisors, and GBV service providers. The chart visually distinguishes between different grievance pathways and resolution steps using color-coded sections and directional arrows.

The same GRM chart will be followed by the beneficiaries' HEIs.

9. CAPACITY BUILDING

Due to the limited resources, the E & S focal point has been working as a GBV focal point at UGC and HEIs. The SEA/SH or GBV-related cases will be handled by the GRM committed following the GRM follow chart (Figure 1), and the E & S focal point will do coordination and communication as required. The awareness program for SEA/SH or GBV will be organized through safeguard activities, also, so there is a need to provide the training to the GRM committee and E & S committee members, the Expert team, and the focal point, frontline staff, and students at HEIs and UGC. UGC will coordinate with the World Bank for the GBV training and orientation.

10. EXPECTED OUTPUTS/OUTCOMES

By successfully implementing the activities as per the goals of NEHEP, the UGC and the beneficiary HEIs will have built their capacities to address the grievances of respective institutions in a timely and efficient manner.

Additional suggestions

1. The GRM process rightly focuses on support, but further needs to be linked to the broader SEA/SH action plan, particularly referenced to the code of conduct to address accountability issues.
2. Suggest a section on training and capacity building, mandating regular trainings/orientation for focal points, safeguard committee members, frontline staff/peer groups at HEIs (student clubs, counselors...)
3. There is no mention of a feedback loop from the survivors (complainants in general), so please consider an anonymous feedback mechanism.