

Government of Maharashtra
Medical Education and Drugs Department
Government Resolution No.: MED-2021/C. R. 27 (E-1312296)/21/Edu-1
Medical Education & Drugs Department
9th Floor, New Mantralaya, G. T. Hospital Premises,
Lokmanya Tilak Marg, Mumbai-400 001
Date: 2 June, 2026

Read - 1. ADB Project Administration Manual

Introduction -

The Government of Maharashtra is implementing the Maharashtra Tertiary Care and Medical Education Sector Development Program (MTCMESDP) with financial assistance from the Asian Development Bank (ADB). The project includes the construction of Government Medical Colleges and attached hospitals at Alibag, Sindhudurg, Amravati, and Washim. In accordance with the ADB Safeguard Policy Statement (2009), it is necessary to establish a structured Grievance Redress Mechanism (GRM) to address grievances related to environmental safeguards, social impacts, occupational health and safety, and other project-related issues arising during the construction and operational phases of the project.

Resolution:-

Accordingly, the Government hereby accords approval to constitute Grievance Redress Committees (GRCs) under the program.

2. As stipulated in the Project Administration Manual (PAM), the Grievance Redress Mechanism (GRM) shall operate through a three-tier system as follows:-

- 1) Facility and/or site level
- 2) PMU or implementing agency level (Directorate of Medical Education & Research)
- 3) Executing agency level (Medical Education & Drugs Department]

3. The Grievance Redress Committees (GRCs) at various levels for effective grievance management under the Program shall be constituted as follows:-

No.	Level	Committee
1	Facility and/or site level	Government Medical College (GMC) GRC
2	PMU or Implementing Agency	Directorate of Medical Education & Research (DMER) GRC
3	Executing agency level	Medical Education & Drugs Department (MEDD)GRC

4. The composition, detailed procedures, timelines, grievance handling process, reporting requirements, and other operational aspects of the Grievance Redress Mechanism shall be governed by the “Grievance Redress Mechanism (GRM) Guidelines under Maharashtra Tertiary Care and Medical Education Sector Development Program (MTCMESDP)” annexed to this Government Resolution.

5. The Composition of the Grievance Redress committee at the Executing Agency level i.e. Medical Education and Drugs Department, Mantralaya, Mumbai shall be as follows:-

1	Secretary, Medical Education and Drugs Department, Mantralaya, Mumbai	Chairman
2	Commissioner, Directorate of Medical Education & Research (Project Director)	Member
3	Deputy Secretary (Edu-1), Medical Education and Drugs Department, Mantralaya, Mumbai (Grievances Focal person)	Member
4	Environmental Expert, Project Management Unit	Member
5	Additional members, if any nominated by Secretary, MEDD	Member

6. This Government Resolution shall come into force with immediate effect. The nomination of Grievance Redress committee members at each level shall be undertaken forthwith by the concerned competent authority (Facility level-Dean of the concerned GMC, PMU level - Commissioner, DMER).

By order and in the name of the Governor of Maharashtra.

(Sandeep Dhakane)
Deputy Secretary to the Government of Maharashtra

Copy forwarded to:

1. Commissioner, Directorate of Medical Education & Research, Mumbai
2. Dean, Government Medical College, Alibaug, Sindhudurg, Amravati, Washim
3. Concerned PMC's (HITES, PWD, RITES)
4. Concerned Contractors
5. Project Manager, Asian Development Bank.
6. Select File (Edu-1)

Grievance Redress Mechanism (GRM) Guidelines
under
Maharashtra Tertiary Care and Medical Education Sector Development
Program (MTCMESDP) (ADB funded Project)

1. Objective of GRM:-

The GRM is established in compliance with **ADB Safeguard Policy Statement (2009)** to ensure a **responsive, accessible, and culturally appropriate system** for addressing grievances related to:

- Environmental safeguards
- Social impacts
- Occupational Health & Safety (OHS)
- Program-related construction and operation issues

This Grievance Redress Mechanism will be used for managing grievances related to environmental safeguards, and occupational health & safety during the construction and operation phases of the program.

2. Principles of GRM:-

The GRM is based on the following principles and the same will be used to assess the GRM performance:

a. Accessibility

The GRM shall be accessible to all people residing in the sub-project area. It shall be available and provide assistance to all project affected people irrespective of language, literacy level, or cost. Project-affected people may access the GRM without fear of any adverse consequences. Information on the GRM will be disseminated using various means to ensure people know about GRC, its members and procedures.

b. Predictability

The GRM provides clear procedures and defined timelines for each stage.

c. Transparency

The GRM shall operate in a transparent manner, ensuring that the actions taken are easily understood by all stakeholders. This shall be achieved through disclosure of relevant information to the public and project-affected people.

d. Credibility

The performance of the GRM will help build confidence among affected people that the mechanism is effective, delivers results, and is trustworthy.

e. Fairness

The GRM procedures are perceived as fair, particularly in terms of access to information and opportunities for meaningful participation in final decision-making. Its outcomes

shall be consistent with applicable national standards and shall not limit access to other grievance redress mechanisms.

f. Feedback

The GRM will serve as a channel for citizen feedback to improve program outcomes for the public. It aims to minimize and manage complaints to reduce their impacts.

3. Scope of GRM:-

The GRM will address grievances during construction and operation phases;

- 1) Covers stakeholders including:
 - a. Workers
 - b. Patients and caregivers
 - c. Local communities

- 2) Complements (and does not replace) existing systems¹ such as:
 - a. CPGRAMS
 - b. Government of Maharashtra Grievance Portal

4. GRM Structure (Three-Tier System):-

Level	Members	Functions
First Level	Facility/Site level GRC Chair: Dean Members: <ul style="list-style-type: none"> • Medical Superintendent • Office Superintendent • PMC (Environmental Expert) • Contractor (Environmental Expert) • Local body representative 	<ul style="list-style-type: none"> • Registration of Grievances • Forwarding Grievances to concerned person or authorities • Communicating with complainant regarding receipt and resolution of complaints • Resolution of complaints raised within five days of receipt • Feedback to the complainant on action completed against registered complaint and seeking complainant feedback on level of satisfaction. • Closure of grievance • If not resolved, then forwarding the complaint to second level of GRC • Resolve within 5 days
Second Level	Second Level – DMER/IA Level Chair: Commissioner, DMER (Project Director)	<ul style="list-style-type: none"> • Registration of complaint • Eligibility assessment of grievances by GRC chair person

¹ Government of India’s Centralized Public Grievance Redress and Monitoring System (CPGRAMS) and Government of Maharashtra’s Grievance Portal (<https://grievances.maharashtra.gov.in/en>) has platform for registering all types of grievances.

	<p>Members:</p> <ul style="list-style-type: none"> • Administrative Officer (Focal person grievances) • Environmental Expert from PMU • Respective PMC (Environmental Expert) 	<ul style="list-style-type: none"> • Information to the complainant about eligibility of the complaint; • Calling Grievance Redress Committee meetings to discuss grievances and action required; • Ensuring collection of detailed information about the eligible complaint; • Assessment of complaint, draw conclusion from discussions and make recommendations; • Develop action plan outlining activities required to implement the recommendations; • Ensuring implementation of recommendations by stakeholders or concerned authorities; • Monitoring actions of the recommendations in view of timeline; • Feedback to the complainant on action completed against registered complaint and seeking complainant feedback on level of satisfaction • Closure of grievances or forwarding of complaint to the third level of GRC, if not resolved within 10 days • Resolution within 10 days
<p>Third Level</p>	<p>State/EA Level GRC Chair: Secretary - MEDD Members:</p> <ul style="list-style-type: none"> • Commissioner - DMER (Project Director) • Concerned Deputy Secretary, MEDD (Focal person grievances) • PMU Environmental Expert • Additional members as nominated by Secretary - MEDD 	<ul style="list-style-type: none"> • Registration of complaints received • Information to the complainant about eligibility of the complaint; • Eligibility assessment of grievances by the GRC chairperson • Ensuring collection of required information about the eligible

		<p>complaint;</p> <ul style="list-style-type: none"> • Assessment of complaint to draw conclusion from discussions and make recommendations; • Develop action plan outlining activities required to implement the recommendations; • Ensuring implementation of recommendations by stakeholders or concerned authorities; • Monitoring actions of the recommendations in view of timeline; • Closing complaint after all actions taken as per recommendations and feedback to the complainant. • Advise to complainants about approach /appeal to the concerned department in case the complainant is not satisfied or complaint is beyond the scope of the GRC • Resolution within 15 days
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5. Grievance Submission Channels:-

For this project, grievances can be submitted through:-

- Complaint/suggestion boxes
- Email
- Post
- Complaint registers at site

6. Grievance Redressal Mechanism and Steps:-

Aggrieved persons may submit grievances or suggestions through multiple channels, including complaint/suggestion boxes, email, post or by entering them in the complaints register at facility/site offices.

At the facility level, the Office Superintendent of the First Level GRC shall act as the Focal Point, responsible for registering grievances and maintaining records. During the construction phase, the Office Superintendent will be supported by the Contractor’s EHS

expert(s) for receiving and documenting grievances related to environmental or other issues, as well as follow-up actions. Appropriate mechanisms such as drop boxes, dedicated email IDs, and phone numbers shall be made available at the facility level.

At the second level GRC, the Administrative Officer shall act as the nodal contact point. Contact details, including web links, phone numbers, and email IDs, shall be displayed at construction sites and on the websites of MEDD and the respective facility.

At each level orders nominating GRC members shall be issued. The GRC shall be gender-responsive and ensure adequate representation of women.

To ensure effectiveness, the GRCs shall meet at least once every three months, even if no grievances are received or all grievances have been resolved at the site level.

The First Level GRC at the facility/site level shall be responsible for timely redressal of grievances related to environmental safeguards, including registration, disclosure, and communication with the aggrieved party.

Depending on the nature of the grievance, it shall be investigated and addressed within 5 days of registration. If unresolved, it shall be escalated to the Second Level GRC within 10 days. If still unresolved, it shall be further escalated to the Third Level GRC, which shall resolve the grievance within 15 days of receipt.

A complete record of all grievances and actions taken shall be maintained throughout the process and reported in the Semi-Annual Monitoring Reports.

The provision for registering anonymous grievances will also be ensured in case the aggrieved person intends for the same.

7. Process of Grievance Redress Mechanism: The following process shall be adopted for receiving complaints and addressing received complaints:

Step 1: Receiving and Registering Grievances (Site Level)

All grievances, complaints, or concerns may be submitted in writing through drop boxes, post or a common email ID. Each complaint shall be recorded and **registered** in a grievance database at the site/Dean's Office with the support of the contractor's focal person **within 24 hours**. Every grievance will be assigned a unique number for tracking.

Step 2: Review, Sorting, and Forwarding (within 24 hours)

The registered grievances shall be reviewed by the focal person with support from the PMC Environmental Expert and the contractor's EHS personnel. They will classify and sort the grievances and inform the GRC Chairperson in writing, including suggestions for issues that can be resolved at site level.

The GRC Chairperson shall determine eligibility. Minor construction-related issues shall be referred to the site engineer for immediate resolution within 24 hours. Complex issues shall be escalated to the GRC.

The focal person shall obtain acknowledgement from the site engineer or relevant authority and inform the complainant about the status and proposed action within 24–72 hours. Ineligible complaints shall be communicated with reasons for rejection.

Step 3: Eligibility Review and GRC Preparation (2 days)

The GRC Chairperson shall review eligible complaints received from the focal person and may seek additional baseline information, if required. The GRC Focal, with support from the PMC Environmental Expert and contractor's EHS expert, shall compile and organize all relevant documents. The Chairperson shall then schedule a GRC meeting at a mutually convenient time for members.

Step 4: Grievance Assessment and Action Plan (3 days)

The GRC may seek additional information from relevant parties, if needed, before assessing the complaint. Based on available evidence, the GRC shall arrive at conclusions and recommend appropriate actions with defined timelines.

The GRC Focal shall record proceedings, track implementation, and inform the complainant of the decision and expected resolution date. For complex cases, the GRC may seek additional time or escalate the grievance to the Second Level GRC after due assessment.

(The above procedure shall also be followed at the Second Level - DMER/IA Level within the prescribed time period, i.e., 10 days.)

Step 5: Implementation of Action (up to 30 days)

The concerned parties shall implement the action plan as recommended by the GRC. The GRC may conduct site visits and consult relevant stakeholders, if required, before finalizing actions.

Step 6: Monitoring and Reporting (Monthly)

The focal person shall maintain and update a grievance database, tracking all cases as registered, in progress, resolved, or escalated. The status of grievances shall be reported to the contractor for onward reporting. The GRC Chairperson shall ensure effective overall management of grievances.

Step 7: Closure of Complaint

The GRC Focal shall prepare a summary of findings and share it with GRC members. Upon approval, the complainant shall be informed of the decision in writing or verbally, and feedback shall be obtained. A complaint shall be closed once all actions are completed and the complainant is satisfied. A closure report shall be prepared and duly recorded in the grievance register.

Step 8: Appeal to State-Level (Third Level) GRC

If the First and Second Level GRCs are unable to resolve a complaint, or if the complainant is not satisfied with their decision, an appeal may be submitted to the Third Level GRC by the complainant or the respective GRC Chairperson.

The Third Level GRC Focal shall register the appeal, assign a tracking number, and acknowledge receipt in writing and also compile relevant evidence and place the case before the GRC. The Chairperson shall convene a meeting to review the complaint, with prior intimation to all members.

Based on the evidence, the GRC shall decide on appropriate actions and prepare an implementation plan with timelines. The decisions shall be communicated in writing to the complainant, and records shall be maintained.

The recommendations shall be implemented promptly. Upon completion, a closure report shall be prepared and signed by the complainant and the Chairperson, confirming resolution of the grievance.

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