

ARABIA ONE SOLAR PV POWER PLANT PROJECT (10MW)

Stakeholder Engagement Plan (SEP)



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1. INTRODUCTION

Arabia One is a 10 MW solar photovoltaic (PV) power plant (the “**Project**”) located in the Ma’an Development Area (“**MDA**”). All output generated by the project will connect to a newly built substation in MDA and will be sold to Jordan’s National Electric Power Company (“**NEPCO**”) under a 20-year Power Purchase Agreement (“**PPA**”). The project is part of the Government of Jordan’s Renewable Energy Program, which aims to increase renewable energy contribution to 10 percent of the country’s generation mix by 2020. The total project cost is estimated at US\$30 million with a proposed IFC loan of approximately US\$10.5 million for IFC’s own account and a syndication of up to US\$12 million.

The entire MDA is 9-square kilometers (km²), and the project site itself is on an area of 0.2 km² in the solar park of the MDA which is situated between the MDA’s industrial park and vocational training center. The area is clear of human settlements and the nearest population cluster identified is in the distance of 8km in the city of Ma’an. As a requirement for the Ministry of Environment (“**MoEnv**”), an Environmental and Social Impact Assessment (“**ESIA**”) has been developed and approved by the MoEnv and IFC.

The project has achieved commercial operation in August 2017 and has subsequently formally entered the operation phase in January 2017 following four months of post-COD handover. The Project is now managed by Arabia One’s operations and maintenance contractor Modern Arabia for Solar Energy PSC (“**MASE**” or the “**Operator**”).

This document constitutes an operational phase Stakeholder Engagement Plan (“**SEP**”) to be implemented by Arabia One throughout the operation phase for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help Arabia One build and maintain over time a constructive relationship with their stakeholders, in particular the locally affected communities. The SEP is a live document which will be updated throughout the Project operation period.

In particular, this SEP includes the following:

- Chapter 2 – Project Description: provides a summary of the Project location, main Project components, Project schedule and job opportunities for the operation phase;
- Chapter 3 – Regulatory Context: highlights the main requirements that are relevant for stakeholder engagement to the Project to include Jordanian regulations and international best practice requirements;
- Chapter 4 – Summary of Past Stakeholder Engagement Activities: provides a summary of past stakeholder engagement activities undertaken for the Project during the development and construction phase of the Project;
- Chapter 5 – Identification of Stakeholders: identifies all relevant stakeholders for the operation phase of the Project at all geographic levels to include national, regional and local levels as well communities within the area of influence of the Project;
- Chapter 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe and responsibilities.
- Chapter 7 – Contact Details: provides contact details of Arabia One for communication with all relevant stakeholders of the Project;
- Chapter 8 – Stakeholder Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project during the operation phase, particularly from affected stakeholder and communities.

2. PROJECT DESCRIPTION

2.1 Project Location

The Project is located within Ma'an Governorate in the South of Jordan, approximately 200 km south of the capital city of Amman. The Project site is 9km southeast of Ma'an city (population 33,300), while the closest village (Al-Mahata Village, population 300) is located approximately 6km to the northwest. The project location is shown in Figure 1 below.

In addition, the Project site is near a major highway which runs from Ma'an city to the Saudi Arabian Border in the South (known as the Mudawwara Borders). Also, located 3km to the North of the Project site is an Industrial Park which houses several industrial facilities. Finally, as stated earlier, the Project is located within a Development Area (known as the Solar Park of the Ma'an Development Area) – an area of 5km² has been developed with Solar PV projects by 9 developers (including Arabia One) for a total capacity of 160 MW.

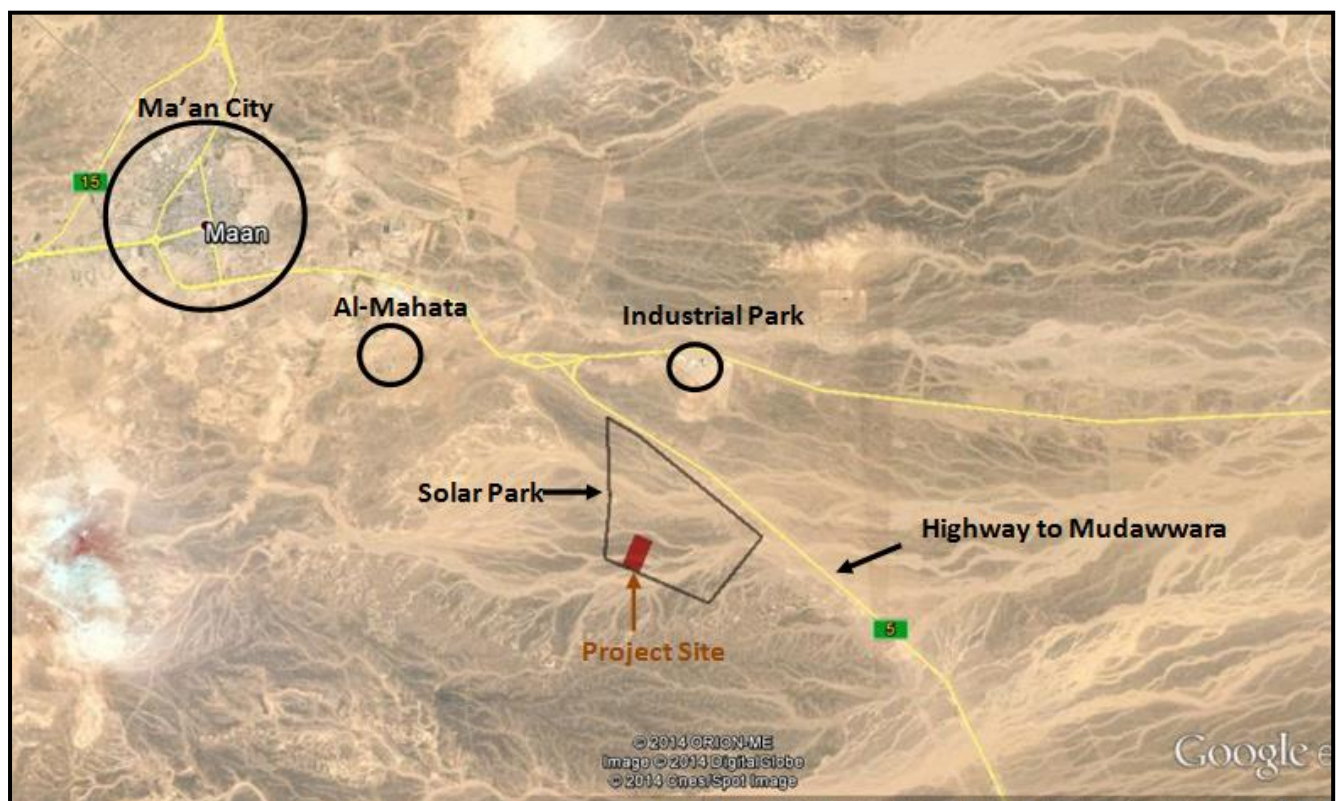


Figure 1: Project Site Location

The Project site is 0.2km² and can be characterized as being dominantly of fairly flat surfaces, with a wadi system which intersects the Project site and runs from the western part of the site to the eastern parts. In addition, the site is classified as a desert-like habitat that is barren and arid and mostly covered with Chert Pebbles, while few vegetation strips can be found scattered mainly within the wadi system.

The Project is composed of 8 zones where each zone has a total capacity of around 1.4MW and is composed of the following:

- PV Power Arrays: arrays are distributed throughout each zone for a total of 5,625 PV panels per zone. Each array is fixed onto a galvanized steel fixed mounting structure; and
- One Central Inverter Station which consists of a DC-AC inverter.

In addition, there are infrastructure and utilities which will serve the Project and which include underground cables, power delivery station, substation, building infrastructure (offices and warehouse), fencing, internal road network and onsite water reservoirs.

The Project contributes towards increasing energy security in Jordan through development of local energy resources and reducing dependency on external energy sources. Producing clean energy will also contribute to lowering electricity generation costs compared to the current costs associated with liquid fuels in Jordan. Per current records, the Project is providing over 20 Gigawatt Hour (GWh) of electricity per year which is enough to cover the average annual electricity consumption of around 4,000 households in Jordan and is offsetting over 14,000 metric tons of CO₂ equivalent per year.

2.2 Project Schedule

Construction activities of the Project have been formally completed on 31 December 2017, with a commercial operation date of 04 August 2017, followed by four months of post-COD handover works. The Project is currently in its operations phase, which will continue for up to 20 years.

2.3 Job Opportunities

Summarized below are the job opportunities that were provided during the construction phase as well as the job opportunities currently being provided for the operation phase of the Project.

- The Project has provided approximately 200 jobs during the construction phase for duration of ten (10) months which has included unskilled labour (e.g. security personnel), semi-skilled labour (electricians, welders, fitters, etc.) and skilled labour (engineers and management professionals). Over 25 temporary job opportunities were filled by members of the local community;
- During operation, the Project is providing 5 direct permanent jobs and 9 indirect permanent jobs which are envisaged to continue for a duration of 20 years. These include 3 local technicians, 1 module cleaning machinery operator and 9 security personnel.

3. REGULATORY CONTEXT

3.1 Relevant Jordanian Stakeholder Engagement Requirements & Legislation

Stakeholder engagement in Jordan is connected to the preparation of an Environmental and Social Impact Assessment (ESIA) and is a requirement of the “EIA Regulation No. (37) of 2005”. For those projects which require an ESIA (as the case for this Project), the Regulation requires a scoping session with potentially affected stakeholders at the onset of the ESIA, in order to provide stakeholders with project information and allow them to participate in the ESIA process. The scoping session was completed prior to the commencement of the construction phase and the Environmental Permit continues to be valid during the current operations phase.

Prior to the commencement of construction, the outcomes of the ESIA were announced to the public and stakeholders through public announcements. No major issues were raised.

3.2 IFC Requirements

Arabia One has obtained financing for the Project from IFC and FinnFund. The Project has been designed and managed in accordance with good international industry practice and standards – including the ESIA, which was finalized and approved. This operations phase SEP has been prepared in accordance with the IFC Policy on Social and Environmental Sustainability including the IFC Performance Standards (PS) and the Environmental, Health & Safety (EHS) Guidelines. The IFC requirements have become the *de facto* international environmental and social performance benchmark for project financing.

The IFC Performance Standards form part of their Sustainability Framework, where the “IFC Performance Standard 1” (IFC, 2012) sets out the following recommendations for stakeholder engagement:

- Stakeholder Engagement is an on-going process that may involve: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to Affected Communities.
- A Stakeholder Engagement Plan (SEP) will be developed and implemented that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
- Affected Communities will be provided with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the stakeholder engagement process; and (v) the grievance mechanism.
- When Affected Communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them.
- The extent and degree of engagement should be commensurate with the project’s risks and adverse impacts and concerns raised by Affected Communities.
- The consultation process will be tailored to language preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.
- For projects with potentially significant adverse impacts, the client will conduct an Informed Consultation and Participation (ICP).
- A grievance mechanism will be established to receive and facilitate resolution of Affected Communities’ concerns and grievances about the client’s environmental and social performance.
- As it is considered that the Arabia One Solar PV Power Plant Project is likely to be categorized as a Category B project under the IFC requirements, it will be disclosed for a minimum of 30 days.

4. SUMMARY OF PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

The table below provides a summary of all stakeholders that were previously consulted and engaged throughout the Project – mainly as part of the ESIA. The table provides a summary of the stakeholder groups that were engaged, date of engagement, and the main objective and outcome.

Table 1: Summary of Previous Stakeholder Engagement Activities

Date	Engagement Activity	Summary of Stakeholder Engagement Activities:
Development Phase		
16 June 2014	Scoping Session	<p>Meeting held in Amman in coordination with Ministry of Environment with attendees identified by ESIA team and Ministry of Environment. The Project was introduced and various components explained. The proposed methodology for the ESIA was outlined and anticipated impacts throughout the Project's phases were discussed. Stakeholders were invited to participate in the scoping of environmental impacts into the ESIA. The main issues raised by stakeholders related to:</p> <ul style="list-style-type: none"> - Landscape and Visual; - Land Use; - Geology and hydrology; - Biodiversity ; - Infrastructure and utilities; and - Socio-economic development. <p>A Scoping Report was submitted to the Ministry of Environment after the session which included the main outcomes and deliberations from the Scoping Session.</p>
28 May 2014	Local Community Consultation	<p>The meeting was headed by the Mayor of Ma'an Municipality at the Greater Ma'an Municipality Hall and the session focused on the nearby community settlements of Ma'an City and Al-Mahata Village. Discussions were held about:</p> <ul style="list-style-type: none"> - The Project; - Environmental and Social Impacts; - Socio-economic conditions and development; and - Opportunity to input into proposed mitigation measures was provided. <p>Session was attended by representatives of local community members; Community Based Organizations (CBO); local academic institutions; local enterprises and businesses; elder representatives of tribal groups; and vulnerable groups – where women, youth and unemployed were identified as vulnerable groups. The main outcomes of the consultation are summarized in Section 6.4.2 in the ESIA.</p>
April – June 2014	Specialist Consultation	Various stakeholders have been engaged and consulted as part of the ESIA process. These are outlined in Table 13 of the ESIA.
Construction Phase		
June 2015	Project Kick-Off	The meeting was headed by the EPC Contractor along with its local subcontractor and presence of representatives from Arabia One. The meeting was held at the Project site and involved a kick-off meeting of the project as it began construction phase. The session was attended by the full local subcontractor team, representatives from the MDA, the team of community technicians hired for the project and local suppliers.

Date	Engagement Activity	Summary of Stakeholder Engagement Activities:
Development Phase		
		The Project’s implementation schedule was discussed along with its particulars, E&S issues and the grievance mechanism.
December 2015	Bi-Annual Coordination	The meeting followed up on the previous Project Kick-Off meeting as part of the EPC Contractor’s engagement.
June 2016	Bi-Annual Coordination	As above
Operations Phase		
January 2017	Operations Handover Session	<p>The Project officially entered its operations phase on 01 January 2017, with the Operator formally taking over the facility. This meeting was organized and headed by MASE and included representatives from the EPC Contractor, the local subcontractor, the team of local technicians who will be involved in the operations and maintenance of the facility and a number of local community attendees who responded to the public call for the meeting. The meeting took place at the Ma’an Municipality and covered the following:</p> <ul style="list-style-type: none"> - Brief about the project status and current stage; - Handover to Operator and brief from EPC Contractor and local subcontractors; - Brief on operations activities undertaken by Operator along with a description of the tasks undertaken by local technicians; - Hiring ceremony for Operator’s local technicians and cleaning machine operator; - Introduction of operating team; - Description of engagement mechanisms and contact information for Operator and Arabia One.

5. IDENTIFICATION OF STAKEHOLDERS

In order to define a communication process in line with the EIA Regulation, a mapping exercise was undertaken at the time of developing the initial SEP in which stakeholder groups that may be affected by (Table 2) and/or interested in (

Table 3) the implementation of the Project have been identified.

The stakeholder groups that may be affected (Table 2) were identified in line with those stakeholder groups whom require special attention and additional coordination or communication to ensure that they get the necessary information or communication. Communication methods with those stakeholder groups are presented in Table 2 below, have been updated for relevant during the operations phase and include the following:

- For the local community this mainly includes undertaking group meetings/public meetings through coordination with the Ma’an Development Area, which has been determined by the Developer to be the most effective entity to connect with stakeholders.
- For the other stakeholder entities identified this mainly includes official correspondence (i.e. through sending an official letter) and undertaking meetings with those entities.

Table 3 identifies stakeholder groups and parties whom are not affected by the project development per se but may have an interest in the operation of the Project. This mainly includes the following:

- National and local governmental institutions (whom might require that they undertake certain inspections or auditing exercises and/or might require certain updates on the implementation of the Project). Communication methods with those entities is to take place through official correspondence (i.e. through sending an official letter) and undertaking meetings with those entities.
- Non-governmental organizations and others institutions whom could be interested in updates on the implementation of the Project. Communication methods with those entities is to take place through Media / website disclosure. Such entities will be provided with such information as part of the disclosure of this SEP as discussed in details in Section 6 below.

The Project welcomes suggestions for improvement of proposed communication methods or media. Suggestions can be submitted via the contact information for the Developer at the end of this document.

Table 2: Summary of Affected Parties/Stakeholders

Affected Party	Likely Communication Methods	Objective
Local Community		
Representatives of local community members	Group meetings/public meetings.	Necessary information and communication required throughout the Project operation. This includes but not limited to the following: <ul style="list-style-type: none"> ▪ Grievance mechanism and procedures; ▪ Provide information on stakeholder engagement program and keep them updated on Project activities.
Workers (including any subcontractors’ workers)	Individual meetings / internal workers’ meetings	To include amongst others information or communication related to company policies and procedures, grievance mechanism, code of conduct, etc.
National Governmental Entities		
Ministry of Environment	Official correspondence / meetings	To include amongst others information or communication related to ESMP implementation; this includes coordination for collection of hazardous waste from site, submission of Disposal Plan, and submission of Transport Plan.

Energy & Minerals Regulatory Council	Official correspondence / meetings	To provide an update on project compliance with EMRC requirements
Local Governmental Entities		
Ma'an Municipality	Official correspondence / meetings	To include amongst others information or communication related to coordination for collection of solid waste from site and coordination for preparation of Transport Plan.
Ma'an Development Company	Official correspondence / meetings	To include amongst others information or communication related to coordination for water supply and wastewater disposal as well as general security coordination and coordination with the community and other relevant stakeholders
Non-Governmental Organizations		
EDAMA	Official correspondence / meetings	Continuous discussion with regards to the establishment, funding and management of a joint CSR fund aimed at optimizing the CSR impact of the Solar Park I development.

Table 3: Summary of Potentially Interested Parties/Stakeholders

Interested Party	Likely Communication Methods
Governmental Stakeholders	
Ministry of Environment	Official correspondence / meetings
Development and Free Zones Commission	Official correspondence / meetings
Ministry of Water and Irrigation	Official correspondence / meetings
Ministry of Labour	Official correspondence / meetings
Ministry of Municipal Affairs	Official correspondence / meetings
Ministry of Energy and Mineral Resources	Official correspondence / meetings
Ministry of Industry and Trade	Official correspondence / meetings
National Electric Power Company	Official correspondence / meetings
Jordan Engineers Association	Official correspondence / meetings
Other Local Authorities/Agencies	
Ma'an Governorate	Official correspondence / meetings
Greater Ma'an Municipality	Official correspondence / meetings
Ma'an Water Directorate	Official correspondence / meetings
Non-Government Organisations (NGOs) and other Organisations	
EDAMA	Official correspondence / meetings
Research and Academic Institutions	
Al-Hussein Bin Talal University	Media / website disclosure
Al Balqa University – Ma'an College	Media / website disclosure

6. STAKEHOLDER ENGAGEMENT STRATEGY AND PLAN

Table 4 below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project during the operations phase, objective of consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations. The plan will include the following:

- Manage expectations so that local communities are realistic about opportunities from the Project;
- Identify the number of skilled and unskilled job opportunities targeted to the local community throughout the operation phases. This will be provided in details to include the qualifications and skills required for each job opportunity as well as the limitations and constraints of local community members and how and to which extent those could be addressed through training and capacity building;
- Present transparent recruitment procedures for the local community, to be adopted and implemented in the various construction and operation contracting arrangements. Such procedures must provide equal opportunities for all, including females;
- Ensure timely and continuous communication and dissemination of information with the local community members to alleviate potential sense of social marginalization and improve their understanding and perception of the benefits associated with development. Communication will also include information and updates on the projects development, number of employment opportunities, the bidding process for project components, plans, etc.

Table 4: Stakeholder Engagement Strategy and Plan

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may be directly or indirectly affected by the project				
1. Residents of Ma'an City and surrounding areas	Notify local communities on all job opportunities for the Project.	1. Run advertisements in local newspapers.	When required during operation	Developer /Project Operator
		2. Post advertisements in Arabic at key local community platforms to include Ma'an Development Area Headquarters, Ma'an Vocational Training Centre, youth CBO's, etc.		
	Disclosure of Operation-Phase Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. SEP to be disclosed on company website.	Once before operation (updated when required)	Developer
2. Summary advertisement in Arabic of grievance mechanism to be posted Ma'an Development Area Headquarters.		Once before operation (to be checked regularly to ensure advertisement in place)	Developer	
Stakeholders who may participate in implementation of the project				
Investor/Lender	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, etc.)	1. Individual/Internal Meetings (if required)	TBD	Developer
		2. Submission of Annual Monitoring Report.	Annually	Developer

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project				
Central Government				
1. Ministry of Environment 2. Ministry of Agriculture 3. Ministry of Labour 4. Ministry of Municipal Affairs 5. Ministry of Energy and Mineral Resources 6. Ministry of Health 7. Ministry of Finance 8. Ministry of Public Works and Housing 9. Ministry of Industry and Trade 10. Ministry of Tourism and Antiquities 11. Ministry of Water and Irrigation 12. Social Security Corporation 13. Energy and Mineral Regulatory Commission 14. Jordan Institute for Standards and Metrology 15. National Electric Power Company 16. Jordan Engineers Association 17. Jordan Contractors Association 18. Department of Antiquities 19. The General Directorate of Jordan Civil Defence	Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or might require certain updates/information on the implementation of the project	1. Individual/Internal Meetings (if required) 2. Correspondence and official letters (if required)	Upon occurrence Upon occurrence	Developer Developer
	Updates on the Project	1. Various reporting requirements (EMRC report, MoE Report)	Annually	Developer
	Local Government			
Greater Ma'an Municipality / Ma'an Development Area	Coordination for the collection of solid waste from the site to the municipal approved landfill Coordination on the security of the site	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before operation	Developer/ Project Operator

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Ma'an Municipality	Coordination for list of private contractors approved for collection of wastewater from Project site, if required.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	During operation	Developer/ Project Operator
	Coordination to secure the water requirements of the Project	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	During operation	Developer / Project Operator
Non-Governmental Organizations (NGOs) and Other Organisations				
EDAMA	Coordination on joint CSR projects	1. Joint/internal Meetings.	During operation	Developer
	Updates on Project to ensure up to date records.	1. Correspondence	During operation	Developer / Project Operator

7. CONTACT DETAILS AND REPORTING

Throughout the Project, all stakeholders can contact the Developer throughout the contact details provided below.

Contact Details for the Public

Community Liaison Officer

Mr./Ms. Mahmoud Al Faouri

Company: Arabia One for Clean Energy Investments PSC

Telephone: +962 79 661 7744

Fax: +962 6 5696299

E-mail Address: a1clo@atc.jo

8. STAKEHOLDER GRIEVANCE MECHANISM

The Developer understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders. Monitoring of grievances during construction have proven to be useful for the signalling of any recurrent issues, or escalating conflicts and disputes. The Developer continues with the Stakeholder Grievance Mechanism during the operation stage.

The Developer has implemented a Grievance Mechanism during the construction stage to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. The Developer continues to accept all comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Jordan.

The Developer monitors the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. The Developer also reports regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

Stakeholder Grievance Mechanism

1. A Grievance Disclosure Sheet has been prepared and disclosed at the locations identified below during the construction phase. This continues to apply during the operation phase. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
 - a. Project Site
 - b. Developer Office
 - c. Direct Contact with CLO

2. Stakeholders willing to lodge a grievance should be able to use the following avenues:
 - a. Grievance Sheets made available at the following locations:
 - **Project Site**
Location: Plot B5 – MDA Solar Park I
Tel: (962) 6 5630449
Fax: (962) 6 5696299

 - **Developer Office**
Location: 260 Arar Street – Amman, Jordan
Phone: (962) 6 5630449
Fax: (962) 6 5696299

 - b. Direct Contact with the CLO through the following:
Community Liaison Officer
Mr. Mahmoud Al Faouri
Company: Arabia One for Clean Energy Investments PSC
Telephone: +962 79 661 7744
Fax: +962 6 5696299
E-mail Address: a1clo@atc.jo

3. All grievances (whether submitted through a grievance form, e-mail, telephone, etc.) will be recorded on a grievance log sheet by the CLO.
4. Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.
5. The CLO will analyse the root cause of the grievance and identify the required actions to be implemented to deal with the issue (in coordination with the relevant personnel from the Developer) and identify the timeline for their completion (if applicable).
6. A response is going to be developed by the CLO (in coordination with the relevant personnel from the Developer) and which will be communicated to the complainant in accordance with the preferred method of communication specified. The response will be signed-off by the Project Manager. This sign-off may be a signature on the grievance log or in correspondence which should be filed with the grievance. All grievances will be responded to within 20 working days.
7. Response of the complainant is recorded within the grievance log to help assess whether the grievance is closed or whether further action is needed.