



**FEDERAL REPUBLIC OF SOMALIA
MINISTRY OF ENERGY AND WATER
RESOURCES
(MoEWR)**

**Grievance Redresses Mechanism
(GRM)
For the
Somali Electricity Sector Recovery Project
(P173088)**

March 2022

LIST OF ABBREVIATIONS:

AP:	Affected Persons
BESS:	Battery Energy Storage Systems
BSSF:	Business Support Services Firm
CSR:	Corporate Social Responsibility
ESF:	Environment and Social Framework
ESI:	Electricity Supply Institutions
ESMF:	Environmental and Social Management Framework
ESPs:	Electricity Service Suppliers Providers
ESS:	Environmental and Social Standards
FGS:	Federal Government of Somalia
FMS:	Federal Member State
GBV:	Gender Based Violence
GIR:	Grievances Investigation Report
GIS	Geographical Information System
GRC:	Grievance Redress Committee
GRM:	Grievance Redress Mechanism
GRS	Grievance Redress System
HIV	Human Immunodeficiency Virus
MoEM	Ministry of Energy and minerals
MoEWR:	Ministry of Energy and Water Resources
NGO	Non-Government Organizations
PIU:	Project Implementing Unit
SEA:	Sexual Exploitation and Abuse
SESRP:	Somali Electricity Sector Recovery Project
SFP	State GRM Focal Point
SME:	Small and Medium Enterprises
SOPs	Standard Operating Procedures
WB	World Bank

TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	Background and project description	2
1.2	An Introduction to Grievance Redress Mechanism (GRM):	8
1.3	GRM Scope and Principles	10
1.4	Objectives of the GRM	11
2	Potential Sources of Grievances:	12
3	GRM Institutional Framework:.....	13
4	The SESRP Grievance Redress Mechanism:.....	15
4.1	SESRP GRM Frameworks.....	15
4.2	Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)	17
4.3	Implementation Steps for SESRP GRM:	20
4.3.1	STEP 1: Identifying Focal Points.....	20
4.3.2	STEP 2: Registration of Grievances:	21
4.3.3	STEP 3: Assessment and Investigation:.....	22
4.3.4	STEP 4: Recommendation and Implementation of Remedies:	23
4.3.5	STEP 5: Referral to the State Office:.....	23
4.3.6	STEP 6: Referral to the Grievances Committee:	23
4.4	Stakeholders Responsibilities in the Grievance Redress Mechanism:.....	25
4.5	GRM communication channels.....	25
5	Performance Standards of SESRP GRM:	25
6	Communication Plan for GRM:.....	27
6.1	Communicate to Build Awareness.....	27
7	Monitoring and Evaluation:	28
8	ANNEXES.....	32
8.1	ANNEX 1: GRIEVANCE REGISTRATION FORM (GRM/001)	32
8.2	ANNEX II: Acknowledgement Receipt (GRM/002).....	33
8.3	ANNEX III: Meeting Record Structure (Grievance Redress Committee & Other Meetings) (GRM/003).....	34
8.4	ANNEX IV: GRIEVANCE INVESTIGATION REPORT (004).....	35
8.5	ANNEX V: Quarterly Report of Registered Complaints (GRM/005).....	35
8.6	ANNEX IV: ToR for Greivance RedressCommittee.....	35

1 INTRODUCTION

A Grievance Redress Mechanism (GRM) is an instrument through which dispute resolution is sought and provided. It involves the receipt and processing complaints from individuals or

groups negatively affected by activities of the Somali Electricity Sector Recovery Project (SESRP).

The Federal Government of Somalia (FGS) is preparing the Somalia Electricity Sector Recovery Project (SESRP) for World Bank financial and technical support. The SESRP aim is to increase access to electricity services and to re-establish the Electricity Supply Industry (ESI) in the Project Areas. The project will be implemented by the two PIUs established at the MoEWR (FGS) and the MoEM (Somaliland), in close coordination with the FMSs, the beneficiary ministries, and ESPs.

1.1 Background and project description

The Project Development Objective is to increase access to lower cost electricity supply from diverse energy resources especially from renewable energy resources for climate change mitigation; and access to improved electricity and health and education services. The proposed Somali Electricity Sector Recovery Project has been conceptualized as the first of a series of three projects. The SOP vision has four themes: (a) infrastructure development, (b) renewable energy generation, (c) electricity supply to public institutions, and (d) sector capacity enhancement. Sector institutional, legal and regulatory enabling environment for sustained sector operations, including enhancing both the public and private capacity to manage and operate the sector. These themes aim to achieve the following outcomes:

- a) Increased access to lower cost electricity supply from diverse energy resources especially from renewable energy resources for climate change mitigation; and increased access to electricity services.
- b) Improved access to functional health and education services.
- c) Sector institutional, legal, and regulatory enabling environment for sustained sector operations, including enhancing both the public and private capacity to manage and operate the sector.

Current Context

The most significant energy resource currently used in Somalia is biomass, and heavy dependence on petroleum fuels. Estimates of the energy needs met through traditional biomass fuels, wood and charcoal vary between 80% and 90% over the whole country. Petroleum products, accounting for about 10% of total energy use, are essentially used for transport and electricity generation and in smaller quantities for cooking and lighting. Electric power generation (almost entirely diesel-fueled) accounts for about two of the ten percentage provided by petroleum fuels. Transportation fuels (gasoline and diesel) account for most of the rest. Liquefied Petroleum Gas (LPG) is used for cooking by the wealthier urban population, while about 5% of households use kerosene for cooking.

Somalia has no national electricity grid infrastructure. Pre-conflict, the Somalia National Electric Corporation (Ente Nazionale Energia Elettrica-ENEE) was the single public utility in operation, supplying Mogadishu and the main regional centers of Hargeisa, Berbera, Burao, Baidoa and Kismayo through distributed diesel generators and associated localized

distribution network grids. The municipalities were responsible for electricity supply to the remaining regional centers. This limited and localized public electricity infrastructure was destroyed during the conflict and the associated institutional frameworks are almost defunct at present with ENEE currently only operating 12 MW installed capacity in the towns of Boosaaso and Qardho through a quasi-Public Private Partnership. Private sector players, commonly known as Electricity Service Providers (ESPs), are the main electricity services providers in Somalia using local private mini grids. The Energy Security and Resource Efficiency in Somaliland and Somali Electricity Access Project have laid a foundation especially the institutional arrangement for the project implementation.

This Project will consist of the following four main components:

Component 1 – Sub-Transmission and Distribution network reconstruction, reinforcement and operations efficiency in the major load centers of Mogadishu and Hargeisa (US\$ 75 Million).

The component activities include sub-transmission and distribution network reconstruction and reinforcement in the major load centers of Mogadishu and Hargeisa to improve network reliability and operational efficiency by interconnecting the current ESPs’ distribution networks and existing generation in order to optimize overall distribution network operations. These activities will support the ESPs to: (i) decrease in the cost of operations (increased generation efficiency, reduction in distribution network losses and distribution network duplications); and (ii) improve electricity supply and reliability. These investments will enable the establishment of interconnected distribution offtake infrastructure (bulk supply points) that will allow deployment of larger generation capacity and interconnection to the proposed transmission grid with neighboring countries. Both distribution and sub-transmission investments are a key precondition for the establishment of a transmission backbone and interconnection with neighboring countries. To enable the network to adapt to worsening climate condition (increasing rainstorm and flooding) steel tubular and concrete poles with concrete foundations will be used to construct the MV/LV lines and MV/LV poles. In addition, for the proposed new lines, the line route will be selected to avoid known flood prone areas.

Component 1-A. Generator Synchronization and Automation. Currently, most of the ESPs have not implemented synchronization and automation as part of their generation processes. As a consequence, separate generator units are connected to exclusive feeder lines and as result, many generators operate below their expected optimal performance criteria. Further, the absence of automation and synchronization, prevents the ESPs from utilizing parallel generation to assure optimal generator performance and dynamic reactivity to electricity load variations. This kind of operation results in significant amounts of “wet stacking” (diesel fuel waste, extra pollution, and performance degradation). These all combine to reduce the potential maximum generation power output, reduce lifespans of the generator engines and elevate maintenance costs and unscheduled generation downtime. Investments under this component will support equipment supply and installation that will

enable synchronizing and automation of the numerous generators presently in operation. Automation and synchronization of the numerous generators will permit the optimization of electricity generation as the synchronization will enable the parallel operation of the generation so that each generator is operating in its optimal performance zone and the automation would makes it easy for a particular generator to be brought online or offline easily and smoothly. The application of automation and synchronization to the numerous generators in each of the targeted major load centers (Mogadishu and Hargeisa) will provide reduced cost of generation accruing from augmentation in generation capacity and reduced wet stacking with concurrent lower fuel consumption, maintenance costs, and reduced GHG emissions.

Component 1-B. Sub transmission and Distribution network interconnection in the major load centers of Mogadishu and Hargeisa. Most of the ESPs with a presence in the targeted project areas operate independently and, as a consequence, there is significant infrastructure and operations duplication. In addition, lack of network interconnection limits the opportunity to share existing generation facilities in addition to the prospect of investing in larger capacity and more efficient generation systems. The subcomponent activities will support investments in the sub-transmission and distribution network infrastructure required to enable generation synchronization and interconnection between the different ESP networks in addition to increased network capacity and reduced network losses. Specific activities include: (i) building bus-bars to permit the generation from several generating units to be synchronized; (ii) interconnection of distribution facilities of individual ESPs with their neighbors; (iii) distribution network reinforcement; and (iv) construction of a Greenfield 132KV sub-transmission line. The intention to focus on establishment of an interconnected sub-transmission and distribution network is deliberate considering the need to consolidate the currently existing investments in infrastructure and concretize the “bottom-up” infrastructure building blocks required to meet increasing electricity demand (see Figure 1):

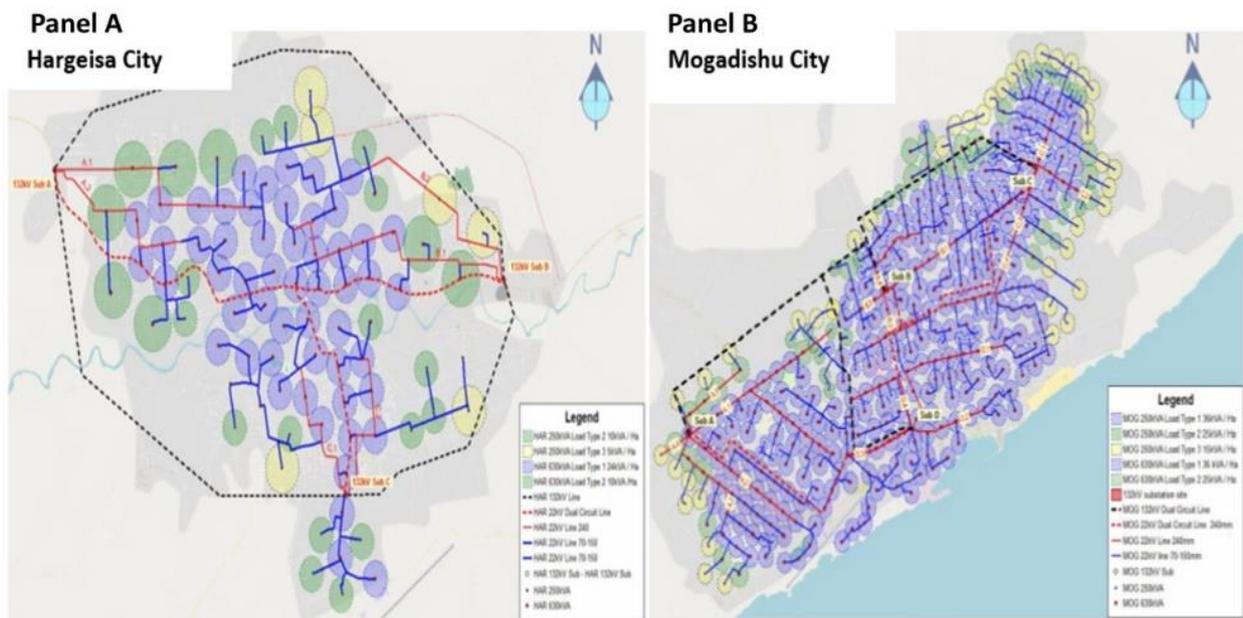


Figure 1: Proposed Sub-transmission and Distribution Network Development

Source: a) Unicon, 2018. Hargeisa City Development Report; b) Unicon, 2018. Mogadishu City Development Report.

Note: For each city this includes construction of a green-field 132 kV subtransmission ring network around the city and MV lines together with associated equipment within the city.

Component 2 – Hybridization and Battery Storage Systems for Mini-Grids (US\$ 20 Million).

This component will support activities aimed at the hybridization and optimization of existing mini-grids. It will support installation of Battery Energy Storage Systems (BESS) and solar PV systems at existing diesel-based generation stations in selected load centers. This component aims at increasing the efficiency of the existing hybrid mini grids (diesel and solar) by optimizing the generation capacity and where possible reduce the diesel consumption by augmenting the installed capacity with BESS and additional solar PV generation. There are several ESPs that have commenced converting their generation systems into hybrid electricity generation mostly via solar PV. These systems are synchronized to operate as part of solar PV-HSDG hybrid generation, with the solar component providing daytime generation. Such hybrid opportunities offer significant improvements in fuel efficiency, fuel consumption, extended generator lifespans, reducing GHG emissions and combustion pollution, along with less reliance on fuel imports. In addition, hybridization has enabled some ESPs to reduce the electricity tariffs by about 40 percent. Further to the proposed efficiency enhancements under component 1, this component will support increased penetration of renewable energy and increased resilience of the existing mini-grids. Retrofitting of the existing ESP owned HSDGs with a BESS unit and setting up additional Solar PV plants would provide them a faster, easier path to greater electrification, better quality of service, lesser cost of generation and also lesser usage and replacement cost of old diesel engines. Complemented by activities under component 1, having synchronized systems offers several benefits: reduce grid shutdowns due to load imbalance, ensure proper load flow and match the generation with the supply available. Further, the synchronized system offers a foundation to foster further greater integration of renewable energy systems like rooftop solar and opens opportunities for future net-metering. The selection of beneficiary ESPs will be based on a set criteria.

Component 3 – Stand-alone solar off-grid access to public institutions (Health and Education) (US\$ 40 Million).

This component complements and expands ongoing activities under the SEAP project (P165497). While SEAP already provides support for nation-wide SHS connectivity scale-up, including for the nomadic population, this component will expand activities to target health and education facilities, which were not part of the SEAP project scope.

This component will finance the delivery, installation, and O&M for Lighting Global certified solar-PV systems over the lifetime of the project for selected education and health facilities. Besides playing a key role in enablement of community co-benefits, facilities that have access to electricity may be better positioned to attract and retain skilled workers, especially in rural areas. Further, this will equip public service institutions to better respond to emergencies, such as COVID-19. The activities under this component support the resilience of the Somali population from the conflict's impact on livelihoods through improved access to functional basic services, such as health and education facilities. Further, it would also strengthen the government's legitimacy before its citizens through the delivery of the "social contract". The component will contribute to the re-establishment of the mandate of the Health and Education line Ministries for the provision of adequate services. The design is also consistent with the Health and Education World Bank projects implementing arrangements to build state capacity and expand revenue mobilization for the line Ministries (through improved services) for improved budget discipline and adequate allocation to cover for the facilities operational costs after the lifetime of the project. In addition, it will establish a platform to rally Development Partners contributions to the budget in the event the revenue mobilized is not sufficient to cover for the facilities expenses.

Selection of the facilities will be underpinned by the Least-Cost geospatial analysis and the list of priority facilities identified by the FGS (in consultation with the FMS) and Somaliland (SL). Site profiling will be conducted during project implementation to confirm beneficiaries' facilities. Component 4 – Institutional Development and Capacity Building (US\$ 15 Million).

Component 4 activities consists of five tailored to the reestablishment of the sector's soft infrastructure for the adequate day-to-day management and establishment of an enabling institutional and regulatory environment for sector operations. Taken together, these activities will lead to the rebuilding of the electricity supply industry in the country and establish the fundamentals for sector development and private sector participation sustainable in the long-run. The component will also support the implementation of the recommendations provided under the ongoing Energy Supply Industry (ESI) Institutional Design option analysis for sector development and project implementation arrangements:

a. Sub-component 1 – Policy and regulatory development. The technical assistance is aimed at strengthening sector governance and regulation to foster autonomy, accountability, and transparency. Specific activities will among others include sector policy, regulation, planning, management and operations, among others. The process of reestablishing the ESI and integrating infrastructure network operations will require a mix of planning and monitoring and, in particular, national skill set advancement and institutional entities. This will also require having in place appropriate regulations, standards, safety and technical including environmental and social performance requirements. Further, the establishment of a regulatory framework will require the ESPs to improve technically, be environmentally and socially responsible, and provide better operations within a levelled and regulated marketplace.

b. Sub-component 2 - Sector Planning and Feasibility Studies for Renewable Energy Projects. Following the adoption of the PSMP, there is need to undertake detailed feasibility studies, such detailed wind resource specific site measurements and geothermal prospecting, so as to progress implementation of the priority investments. The technical assistance will also support MoEWR/MOEM to undertake integrated planning including preparation of a Least Cost Development Plan covering generation, transmission and distribution and Electricity Access Strategy and Investment Prospectus. Improved sector and electrification planning will inform a more comprehensive electrification program in the country adequately targeting the different segments of the population, including residential, commercial, nomadic, as well as public institutions. In addition, an assessment for productive uses of electricity will be conducted in the project areas to inform a pilot and the broader electrification planning and rollout agenda, also learning from the support provided under the SEAP project in providing off-grid connectivity to businesses. The pilot will be accompanied by a (also pilot) consumer awareness campaign building on the experience in similar contexts. The technical assistance is aimed at supporting the sector to have in place a sector wide development framework that will enhance crowding-in funding, both private and public.

c. Sub-Component 3: ESP Business Support Services. The technical assistance will support selected ESPs to enhance their capacity in both utility business management operations and also assist to set up business processes that would not only enable them comply to the license obligations, but also help them to grow their businesses and revenue stream leading to long-term additional sector investments. The intent of the assistance is to enhance and increase the role of the ESPs, and the private sector in general, in the sector ownership, management and operations. The technical assistance to enhance the ESI institutional capacity would initially support and guide the day-to-day sector undertakings through a Business Support Services Firm (BSSF) approach. The BSSF approach seeks to support and guide the day-to-day sector undertakings over a medium term to reestablish the Somali electricity sector covering both policy, oversight, operations and management including coaching and hands-on training of the sector staff and sector studies. The sub-component will also support ESPs with capacity to manage E&S aspects in their operations including preparation of ESP EHS manuals that would in particular focus on the ESP operations and maintenance obligations of the facilities financed by the project. The BSSF will also support the sector line ministries for the adequate management of sector policies and planning, establishment of an enabling environment for sector operations, including regulations (primary and secondary), safeguards, and day-to-day management and oversight.

d. Sub-Component 4: Project Implementation Support including for environment and social safeguards. This subcomponent will finance execution, design, and supervision consultants to assist the MoEWR/MoEM PIUs and associated agencies in project implementation, sector management and coordination. This subcomponent will also support key functions of the PIUs Project Management Teams (project management, procurement, financial management (FM), safeguards, and Monitoring and Evaluation) required for project

implementation. The subcomponent will also include technical assistance to enhance sector fiduciary arrangements as well as setting up an E&S risk management system, enhancing the E&S capacity through staffing and training on the ESF requirements based on a robust capacity building plan. The Sectoral Environment and Social Assessment shall inform the sector wide development framework and E&S risk management capacity and performance for the sector. Specifically, the subcomponent will finance the Owner's Engineer Consultancy Services to support the PIUs with regard to the project design, procurement and contracts' management, including fiduciary and E&S aspects covering responsibility of preparing E&S documents along with the sub project specific designs. A dedicated Environmental and Social firm will support the PIUs in the areas of health, safety, labor management, land, resettlement, community engagement and security. In addition, the sub-component will support other technical assessment and capacity building activities for the successful implementation of the project. This will include, for instance, trainings for the Ministries of Health and Education for the management and operations of the solar PV systems beyond the lifetime of the project.

Sub-Component 5: Implementation of Gender Action Plan. This subcomponent will support a series of interventions envisioned to close the identified gender gaps. A gender diagnostic assessment to identify specific gender gaps within the energy sector, particularly barriers that limit career progression of women within the energy sector, was undertaken as part of the project preparation. The assessment highlights four critical areas to be considered for women to be employed in the energy sector: (i) pipeline (education sector), (ii) skills-training, (iii) women's employment and retention in the energy sector and (iv) policy and legal framework to support women's employment. The diagnostic gender gap assessment, will be undertaken as part of the project implementation that will inform the gender activities necessary to close gender gaps in the sector including the design and implementation of a pilot incubator to accelerate the employment of women engineers in the sector, and the preparation of a Gender Action Plan and a Gender Capacity Building plan.

1.2 An Introduction to Grievance Redress Mechanism (GRM):

The World Bank supported projects ensures a forum for people adversely affected to voice their concern and seek solutions to their problems. A systematic and functional GRM shall be adopted to address the concerns of aggrieved parties (PAPs, vulnerable groups including women, IDPs, gender-sensitive issues, workplace concerns and community concerns). Such a mechanism shall detail the processes involved in registering grievances at no cost to the aggrieved parties as mentioned above.

The federal Ministry of Energy and Water Resources (MOEWR) ensures in creating enabling environment/system to accommodate any unanticipated environmental or social risk and impact arises during the implementation in line with the country and WB environmental and social safeguard standards. Therefore, the Grievance redress mechanisms (GRM) must be established within the project ambit. The layers of the GRM shall be well publicized as a way of educating PAPs, recruited workers and other residents on the process. Alternative means

of access, however, will be the public information centers that will be established at various project sites. At the same time, information about where complaints can be lodged shall be provided by the client and or the consultant will be published on public notice boards, communicated verbally at all public meetings, and outreach sessions so that there is a wider public understanding and acceptance of the mechanisms proposed for grievance redress.

Originally contained in the Stakeholder Engagement Plan as well the Environmental and Social Management Framework (ESMF) of the SESRP, this GRM has been revised and expanded so it can be released as a standalone document that covers both complaints and grievances under SESRP for easier use and reference. In case of any differences between versions, this, the standalone version of the GRM will take precedence to guide all the grievances and complaints related to the project interventions.

Key definitions are as follows:

An affected person (AP) is a person that is adversely affected temporarily or permanently as a result of sub-project works under SESRP.

A complaint is a statement (verbal or written) or expression of displeasure that an impact or effect arising from a sub-project is unsatisfactory or unacceptable to the complainant. Unresolved complaints may become grievances if not dealt with appropriately and within a short (typically 2 days but a maximum of 14 days) timeframe. Complaints able to be dealt with or resolved immediately can be referred to as minor complaints

Grievance may refer to any complaint, concern, injustice, wrongdoing, accusation related to the project implementation. A grievance could mean a simple query or inquiry, concern, issue, or formal complaint that bothers the lives of aggrieved parties.

Grievance Redress Mechanism (GRM) is a set of specified procedures for revealing, assessing, methodically addressing grievances or complaints and resolving disputes and monitoring. It is a mechanism whereby queries or clarification about a project are responded to systematically, problems that arise out of implementation are resolved and grievances are addressed efficiently and effectively. A GRM provides a predictable, transparent and credible process to all parties, resulting in outcomes that are seen as fair, effective and lasting.

A well-functioning GRM can provide benefits to both the project and the Affected Persons (AP)

Table 1.1: Benefits of GRM

Benefits to Projects	Benefits to AP and other stakeholders
<ul style="list-style-type: none"> • Provides information about project implementation • Provides an avenue to comply with government policies 	<ul style="list-style-type: none"> • Provides a cost-effective method to report their grievances and complaints

<ul style="list-style-type: none"> • Provides a forum for resolving Grievances and disputes at the lowest level • Resolves disputes relatively quickly before they escalate to an unmanageable level • Help win the trust and confidence of community members in the project and creates productive relationships between parties • Ensure equitable and fair distribution of benefits, costs, and risks • Mitigates or prevents adverse impacts of the project on communities and produces appropriate corrective or preventative action • Helps avoid project delays and cost increases and improves quality of work. 	<ul style="list-style-type: none"> • Establishes a forum and a structure to report their grievances with dignity and access to a fair hearing and remedy • Provides access to negotiate and influence decisions and policies of the project that might adversely affect them • Facilitates access to information
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1.3 GRM Scope and Principles

The Project ensures in establishing a grievance mechanism that addresses concerns of stakeholders promptly and effectively and in a transparent manner. This GRM guarantees to create culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism will not prevent access to judicial or administrative remedies- in case tribunals and other recourse mechanisms for addressing grievances are needed. The project-affected parties will be informed about the grievance process during its community engagement activities.

The GRM is designed to improve project outcomes by creating public awareness about the project and its objectives, deterring fraud and corruption, mitigating socio-economic and environmental risks, and providing the SESRP coordinator with practical suggestions and feedback during program implementation. The targeted audience for this GRM will range from the funding body, project beneficiaries and their related institutions. This GRM will be robust enough to address conflicts and complaints across the above-described scales.

In accordance with World Bank ESF, the proposed GRM covered the following principles:

- **Accessibility:** The GRM will be accessible to everyone affected by the project. It should be available and aid those who face barriers such as language, literacy, awareness, cost, or fear of reprisal.
- **Predictability:** The GRM will offer clear procedures with time frames for each stage and clarity on the types of results it can and cannot deliver.
- **Transparency:** The GRM will operate in such a way that it is easy for others to see what actions are being performed. This will be undertaken through disclosure of all information to the public and affected people.

- **Credibility:** The performance of the GRM will enable affected people to accept and believe that the mechanism works, delivers results and is honest.
- **Fairness:** The GRM procedures will be perceived as fair, especially in terms of access to information, and opportunities for meaningful participation in the final decision. Its outcomes should be consistent with applicable to national standards and should not restrict access to other redress mechanisms
- **Feedback:** The GRM will serve to channel citizen feedback to improve project outcomes for the people

1.4 Objectives of the GRM

The primary purpose of the GRM is to ensure the collect and address the complaints or the concerns of aggrieved parties to a fair extent and on time. Dissatisfaction can cause an aggrieved party to act beyond expectations, which would culminate in some unforeseen repercussions that would negatively affect project implementations and stall project progression. Consequently, the Project's GRM will seek to achieve the following objectives:

- Encourage registration, acknowledgment, and recording of all concerns or issues raised by aggrieved;
- Identify the frequencies of issues raised: for instance, unpaid compensation, inadequate compensation, disregard for local ritual ceremonies, land acquisition, workplace concerns and many more;
- Ensure that complaints are properly registered, tracked and documented, with due regard for confidentiality;
- Address the composition of a committee that would handle all grievances; Inform people of the public information center establishment and access;
- Establish procedures for the GRM to enhance easy access, transparency and accountability, and tackle escalation of grievances beyond expectations;
- Manage the concerns raised by aggrieved parties to achieve a win-win situation within a reasonable time frame that would comply with national and international best practices; and
- Record all resolutions agreed upon by all parties involved and ensure that aggrieved persons are satisfied with every outcome of remedial resolution to foster harmony in sub-projects. GRM Principles

2 Potential Sources of Grievances:

The SESRP is designed to bring about positive social impacts like improved well-being of community members through provision of access to constant electricity and providing livelihood security for the overall populations in targeted areas. Though private sector driven, while actualizing these noble objectives, it is anticipated that, among other likely issues, subprojects under Components 1 and 3 (Component 1: Solar Hybrid Mini Project components will lead to the acquisition of land and various construction and installation activities, which could result in displacement of persons, restriction of access or loss of livelihood. if improperly managed components 1,2, and 3 could lead to complaints and grievances from the end users or misunderstandings between the Energy Access companies and all relevant parties in the project.

Since key project activities will be in dense urban settings, parties have livelihoods that depend on the land, the loss of land is thought to also result in the loss of their livelihoods. In a similar vein, Risks of forced displacement of IDPs by the government: Forced displacement of IDPs, who fled from drought and violence and have settled on idle private or public lands in Somali cities, is rampant especially in urban centers such as Mogadishu, Hargeisa and Garowe where land is scarce and land values are high.

Another potential source of grievance may be corruption or unfair benefits to some. Similarly concerns that the compensation due to PAPs may be paid very late, which could create considerable stress and inconvenience and lead PAPs to incur further costs. Other sources of grievance may include work-related concerns such as terms of employment, rights related to hours of work, wages, overtime, compensation and benefits injuries, deaths, disability, disease, and hazards to project workers.

Grievances may also be received during construction activities in terms of damages or inconvenience caused to the nearby community or regarding the behavior of contracted workers.

Other grievances are likely to come up in the following cases, or because of the following activities/ inactivity:

- Environmental concerns due to presence of batteries and other equipment or waste management (e.g., battery disposal)
- Non-inclusion of community members in paid labor/ workforce
- Non-inclusion of community members in decision regarding design of the Mini Grid, its operation and billing process
- Existing political divisions in different levels of the FGS (center vs. periphery) communities and the consequent perception of project citing as more favorable to one divide
- Unrealistic Corporate Social Responsibility (CSR) expectations from the contractors by community members

- High cost of services e.g. community members are usually required to pay a one-off ‘connection fee’ covering cost of a breaker and cables to connect power from poles to the user’s house or business premise
- Conflicts arising from users by-passing meters to use free electricity
- Prolonged downtime in electricity supply due to faulty equipment
- Delay in execution of project leading to breakdown of trust e.g. delay in take-off after contractor has mobilized equipment to site
- Disruption of public access and disturbance resulting to loss of business days and associated income
- Disagreements over product warranty
- Accidents or injuries due to construction
- Potential risk of social conflict with communities because of labor influx, including forms of Gender Based Violence (GBV)/ Sexual Exploitation Assault (SEA)
- Insecurity
- Equipment installation e.g. poles and cables running through or above homes and other privately owned properties

3 GRM Institutional Framework:

The project GRM will build on what was created for the Somalia Energy Access Project (See separate SEP). A specific consultation session on the E&S Risk Assessment and Action Plan and GRM will be set up to complete the SEP. A Feedback and Grievance Redressal System that will have a various contact channel is envisioned for SESRP. Noting the indirect benefit of component 1 to citizens/households due to reduction of inefficiencies in the network, the GRM will include mechanisms for citizen or households to be able to register their feedback or complaint towards the performance of the ESPs, their existing supply situation, billings, etc.

The GRM will be in place by the time RAPs and ESIAAs are prepared, until completion of all construction activities and beyond until the defect liability period ends. A separate mechanism will be developed to address worker grievances. Grievances related to the actions of contractors will be resolved by the contractors.

The GRM will be a project wide GRM that will also be available for use by PAPs. The GRM will work interconnectedly with local level actors at the FMS, community, District, and municipal levels. This is to ensure that all measures are taken to address the grievance. The GRM will be housed at both MoEWR (FGS); and the MoEM (Somaliland) and provide access to SESRP stakeholders and contractors to register complaints received at sub-project level or the field. At the project level, a Grievance Redress Committee (GRC) was established and composes the director of energy department, project, legal aid, gender specialist, environmental and social safeguard specialists of the project. (see annex IV). Local, state and municipality level GRC that consists of local leaders, municipal representatives, community-based organizations, Legal Aid and law enforcement agencies

will be established after the first of the project or once the construction activities start. This GRC will be headed through a consensual appointment done with affected communities, and steps will be taken to ensure that all grievances are properly documented and transferred to the digital platform for tracking of resolution.

PAPs may also make complaints directly to the project wide GRM through the key contact persons (Grievance officer).

Contact numbers-: +252610850613, +252628850613,

Email address: grm.sesrp@gmail.com, digital platform either by calling, sending text,

WhatsApp numbers: +252610850613, +252628850613.

The project will identify an NGO GBV service provider to setting up and ethically manage SEA/SH complaints as documented in the separate GBV and SEA /HS Action Plan. Detailed structure of the GRM for the project workers will be finalized and described in the LMP and project implementation manual.

The GRM implementation process will involve the following steps:

- The safeguards specialists at respective MoEWR (FGS); and the MoEM (Somaliland) will man the GRM platform for Project level to ensure timely sorting and escalation of grievances to resolving officer
- Assign a focal person (s) from OE, Contractors and local GRC for grievance uptake and reporting
- Train assigned focal person (s) to receive and log complaints in the GRM Database; Constitute GRM Committee to resolve grievances
- Screen, classify and refer complaints to appropriate unit for redress Monitor, track and evaluate the process and results
- Provide feedback to complainant within two weeks, and an opportunity for appeal if not satisfied with resolution approach
- Overall, the process for grievances reporting by aggrieved parties include following:
 - Lodge complaints through phone call through the key contact persons, contact numbers, email addresses, text message, WhatsApp, in-person directly to the digital platform or the GRC at the local levels
 - Acknowledgment and registration;
 - The investigation, verification, and determination of resolution options;
 - Provision of feedback to the stakeholder regarding resolution and progress towards resolution and complainant satisfied;
 - Final resolution -tracking and documenting actions and outcomes in the database and with the stakeholder;
 - Where a PAP is fully satisfied with the resolution process, the matter will be formally closed;
 - If the complainant is not satisfied with the mediation provided using the project GRM, a referral should be made to the court of Law. This stage of the process should be avoided, though it can be utilized to get a final review of the matter being reported.

4 The SESRP Grievance Redress Mechanism:

As a project-based mechanism, the SERP GRM is taking into cognizance the components and the subcomponents of the project design as well as the culture of immediate environments of the proposed project sites. The mechanism will assume responsibility for occurrences and issues that have direct relation to the project or bearing on the activities that are being carried out for achieving the components and all the subcomponents of the project in the intervention sites. It must be noted that the SESRP GRM does not apply in any way to matters predating the project in project areas of influence.

Developing a GRM for the SESRP involved sets of activities. The first was to appraise the nature of project components and review the current situation of grievance handling in the APs locations, through a review of extant literature on the social and environmental contexts of the project and its various areas of influence. Already prepared policy documents for the project, such as the Environmental and Social Management Framework (ESMF) as well as laws, conventions and policies as they relate to development, especially World Bank projects were reviewed for this task. This was supported by consultations with relevant stakeholders, to reconfirm some of the findings in the literature as well as establish the variables that would determine the structure of the GRM and its key components.

The desk review established the socio-economic context of persons in the established project host communities and the un-established, as well as the legal and policy environment that necessitates the establishment of grievance redress mechanism for the project. Field consultations were done to appraise the prevalent situation around the project areas of influence, as well as to get understanding of the operational environment of the project that may arise.

4.1 SESRP GRM Frameworks

To ensure an effective operation of the GRM, potential grievances, tools for presentations and responding authority are classified according to the three project components on Table 1.1 below.

Table1.1 Potential Grievances, Presentations and Responding Authority

Project Component	Project Intervention Activity	Potential Nature of Grievance	Tools for Presentation	Ultimate Responding Authority
1	Distribution network reconstruction, and operations efficiency	- Land related matters, e.g., poles and cables running through or above homes and	- Physical complaint, - Written petitions, - Official Emails, - Phone calls & SMS	WB, MoWR, PIU and ESPs,

Project Component	Project Intervention Activity	Potential Nature of Grievance	Tools for Presentation	Ultimate Responding Authority
	in the major load centers	<ul style="list-style-type: none"> - private lands - Environmental concerns due to presence of batteries and other equipment - Waste management (e.g., battery disposal) - Gender based violence/ Sexual exploitation of locals as a result of labour influx 	<ul style="list-style-type: none"> to GRM hotlines, - Use of designated drop boxes - Channels for confidential and safe complaints for GBV/ SEA related grievances 	
2	Renewable energy generation optimization.	<ul style="list-style-type: none"> - Supply of equipment considered by consumers as substandard - 	<ul style="list-style-type: none"> Physical complaint, - Written petitions, - Official Emails, - Phone calls & SMS to GRM hotlines 	MoWR, PIU and ESPs
3	Electricity services for improved public services delivery (Health, Education and Water Supply Institutions)	<ul style="list-style-type: none"> - Accidents or injuries to student or community - Gender based violence/ Sexual Exploitation as a result of labor influx - Security matters 	<ul style="list-style-type: none"> Physical Complaint - Written petitions, - Official Emails, - Phone calls & SMS to GRM hotlines, - Use of designated drop boxes - Channels for confidential and safe complaints for GBV/ SEA related grievances 	WB, Relevant ministries, PIU and ESPs
4	Sector Capacity Enhancement and Project Implementation Capacity Support.	<ul style="list-style-type: none"> - Gender based violence/ Sexual Exploitation as a result of labor influx - Land related matters - Security related matters 	<ul style="list-style-type: none"> - Channels for confidential and safe complaints for GBV/ SEA related grievances - Physical complaint, - Written petitions, - Official Emails, Phone calls & SMS to GRM hotlines 	

Diverse methods for reporting grievances that are culturally appropriate are to be used and they should permit for self-identified, confidential, or anonymous procedures (professional letter writers, suggestion boxes, Email, toll-free telephone etc).

Avenues for verbal complaints are:

- Complaints to members of the local Grievance Redress Committee (GRC)
- Social Safeguards & Communications desks at the SESRP -PIU
- Open community mediation sessions
- Operators' Customer Care Unit
- Town hall meetings

Avenues for written complaints are:

- Complaint Boxes in the community, operator's office or by hand
- Letters or Email to the SESRP-PIU
- Dedicated telephone lines shall include:
- SESRP -PIU hotlines
- Operator Customer Care hotlines

An email feedback systems and 24/7 hour phones has been established and operationalized at the PIU.

Telephone: +252610850613 / +252628850613

WhatsApp: +252610850613 /+252628850613

Email: grm.sesrp@gmail.com

4.2 Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism shall have a different and sensitive approach to GBV related cases and should be dealt with according to the complainant's informed consent.

All complaints related to GBV shall be treated in a private and confidential manner, limiting information to what the survival or complainant is freely willing to provide. A separate register shall be opened for this category of cases and shall ONLY be accessed by the community based GRC, the GRM coordinator at the PIU.

The complainant (if a survivor) shall be attended to with empathy, assurance of safety and confidentiality. If the complainant is not willing to divulge any information, this view should be respected by the GRM officer, and the complainant referred to the appropriate nearest medical center, approved available GBV service provider or police, depending on the complainant's choice. Such a complaint should be reported to the government's GRM channels as well by the PIU GRM officer.

All staff and GRM focal points should be informed that if a case of GBV is reported to them, the only information they should establish is if the incident involves a worker on the project,

the nature of the incident, the age and sex of the complainant and if the survivor/complainant is referred to service provision. If a worker on the project is involved the incident should be immediately reported to the National Program Coordinator who will provide further guidance after consulting with the World Bank.

Other considerations for the handling of GBV/SEA grievances include:

No GBV data on anyone who may be a survivor should be collected without making referral services available to support them. All GBV complaint should be referred to the right service provider and other relevant institutions, information to be requested should be limited to:

- The nature of the complaint (what the complainant says in his/ her own words without direct questioning)
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

Given to the sensitive nature of GBV Complaints, the GRM will provide different reporting channels to submit grievances including phone, text message and email which will be manned by the GBV Advisor. Although other entry points at the FMS level will be identified including focal points.

At the Municipality /Local Government level, a Grievance Redress Committee (GRC) will be established and composed of local leaders, municipal representatives, the project, community-based organizations, Legal Aid and law enforcement agencies. A GBV focal point will be nominated from the GRC to support and refer GBV survivors to services available in the community, based on his/her consent, as per the GBV referral pathway all while maintaining confidentiality to protect the survivor.

Where the SESRP project worker has allegedly committed GBV/SEAH grievance, the case will be reported to the respective employing agency. The PIU GBV Advisor will follow up and determine jointly with a specially constituted “SEAH Committee”, the GBV Advisor from PIUs (MoEWR (FGS) and the MoEM (Somaliland), NGO GBV service provider, and sub-contractors on the GBV/SEAH allegations related to the project. A standardized Grievance Registration Form will be used to register GBV/SEA/SH incidents (See Annex VIII).

Specific details on how the GRM will work will be spelt out in the GRM SOPs to be developed by GBV Advisor during project effectiveness that is, quarter 1 after signing of works contract. All relevant staff of the PIUs and IPs will receive training on receiving GBV complaints, survivor centred approach and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GM Operators will be trained on key protocols including referral, reporting and informed consent protocols and on the survivor centred approach to receive those cases in an appropriate manner and immediately forward it to the GBV/SEA/SH referral system. The GM Operator will ensure appropriate response by

- 1) Providing a safe caring environment and respect the confidentiality and wishes of the survivor.
- 2) If survivor agreed, obtain informed consent, and make referrals,
- 3) provide reliable and comprehensive information on the available services and support to survivors of GBV.

Possible channels that function as part of the two grievance mechanisms could include:

- For workers: independent helplines, an email address. It is important that these channels provide anonymity for the aggrieved persons.
- For service users or community members: feedback boxes, telephone/ hotline numbers etc.

The GRM aims to support GBV Survivors by referring them to GBV Services Provider available in the community (this can be a local NGO already working on GBV, or the contracted NGO GBV service provider in the project location) for support immediately after receiving a complaint from a victim. Support options to survivors may include the following:

- i. Medical support for incidents involving sexual violence, which may include treatments that need to be administered within 72 hours of the incident to be effective, such as:
 - Emergency contraception to prevent unwanted pregnancy
 - Post-exposure prophylaxis treatment to reduce the chances of HIV infection.
- ii. Psychological support for victims and witnesses, which may need to include trauma counseling for victims of sexual violence or harassment
- iii. Legal advice for victims, whistleblowers, witnesses, and alleged perpetrators
- iv. Measures that support reintegration into the workforce (e.g., counseling)
- v. Child-protection support services and/or expertise for reports involving children.

NB: These multisectoral services may not be available in all the project areas and the contracted service provider/ other service providers may fill in the gaps in services. The project will aim to have the survivor accessing at least health and psychosocial services where services are scarce.

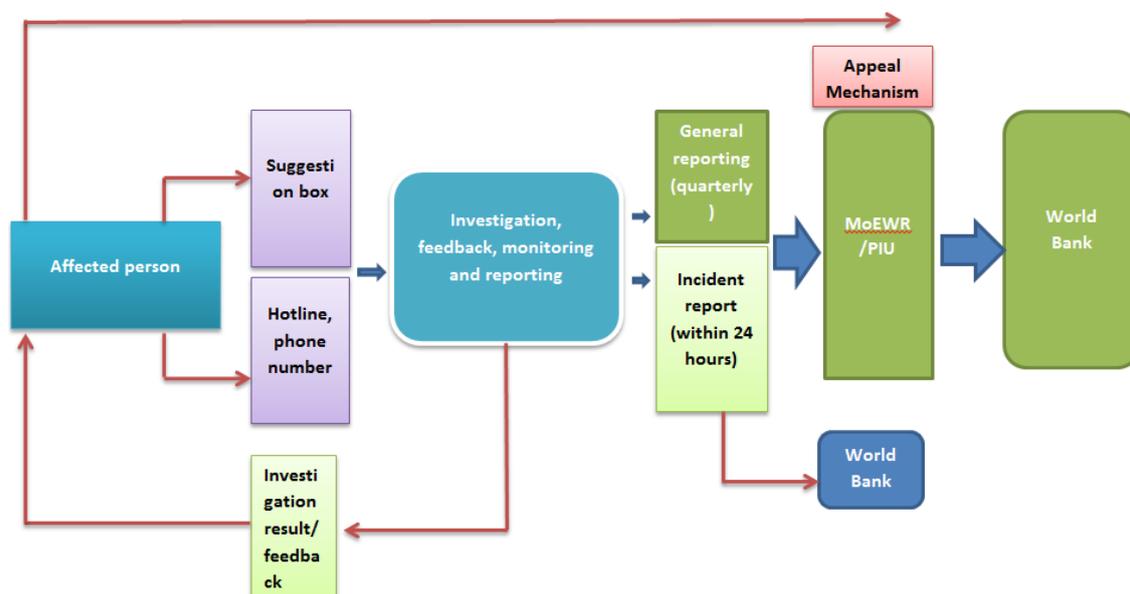


Figure 4-1: GBV Complaints to the PIU and World Bank

PIU: Telephone: +252610850613 / +252628850613

WhatsApp: +252610850613 /+252628850613

Email: grm.sesrp@gmail.com

World Bank Somalia Office: If no satisfactory resolution of complaints has been received from the PIUs, complaints can be raised with the World Bank Somalia office on somaliaalerts@worldbank.org

World Bank Grievance Redress Service:¹ If no satisfactory resolution has been received from the World Bank Country office, grievances can be raised with the World Bank Office in Washington. For more information: <http://www.worldbank.org/grs>, email: grievances@worldbank.org

4.3 Implementation Steps for SESRP GRM:

The SESRP GRM has been designed to provide a timely, responsive, and effective system of resolving community groups or individual's grievances in the areas the project is implementing activities. It is a process starting at the local, through the state administration to the federal level. It is a multi-stage process that ensures that all stakeholders from the community level structures to the National office are involved in finding solutions to the grievances raised by the communities the project is targeting. The project has fully operationalized the GRM and is managed by the project's Social Safeguards specialists.

All project affected persons will be informed of their rights to raise grievances pertaining to national GRM frameworks. Mechanisms are put in place to ensure that grievances are recorded and considered fairly and appropriately. Project management will issue and publicize a grievance redress policy that clearly states that management embraces grievance reports and views them as opportunities for project improvement and identified a guiding principle; defining the scope and types of grievances to be addressed; setting out a user-friendly procedure for lodging grievances; outlining a grievance redress structure; describing performance standards; and spelling grievance review mechanisms.

4.3.1 STEP 1: Identifying Focal Points

Staff in charge of grievance redress should be skilled and professional. Therefore, the SESRP management will identify high-calibre staff (Focal Points) at all levels of their projects and assign them responsibility for handling (receiving and registering) grievances. GRMs can have multiple focal points to receive and register grievances. This GRM is designed to give

¹ <http://pubdocs.worldbank.org/en/440501429013195875/GRS-2015-BrochureDec.pdf>

the aggrieved parties access to seek redress to their perceived or actual grievance using this mechanism or other existing mechanisms such as the National legal system (i.e. Courts), mediation boards (elders), GRCs and traditional systems (village courts). It is equally important to have someone who has overall responsibility for tracking and following up on issues and complaints raised. The descriptions of the GRM functions should clearly stipulate the official designations and the roles of the focal points so that they can really be held accountable for performing their functions. The GRM for the SESRP will have identified the focal point persons from community to national level and their tasks have been formulated.

At community level, the project grievance redress structure will be linked and interface to the existing traditional authority structure as this already provides for resolving conflicts in the communities. This will ensure accessibility to the GRM as the traditional structures are close to the people. The Focal Person will be someone with knowledge of the local and/or official language of communication and should be able to record the grievances where need be.

The Project will implement training program to teach staff, Focal Points, community members and other stakeholders how to handle grievances and why the GRM is important to the project's success. This training should include information about interacting with beneficiaries about grievances, the organization's internal policies and procedures in relation to grievance redress. It will also be useful to establish or build on local and community based GRMs by providing grievance redress training for stakeholders at the local level. This greatly reduces GRM costs while enhancing beneficiary satisfaction with, and ownership of, the grievance redress process.

4.3.2 STEP 2: Registration of Grievances:

A register of grievances which will be held by the GRM Officer or any other appointed person by the project. The Aggrieved Party (AP) must register their grievances with the GRM focal point.

To register the grievance, the AP will provide information to the GRM focal point to be captured in the Grievances Registration Form (**Annex 1**). The GRM will accept complaints from the APs submitted through verbal, email, phone, Facebook, whatsapp, meeting or letter to the office of the GRM, in English or local language. The focal point persons handling grievances will transcribe verbal submissions. Receipt of grievances shall be acknowledged as soon as possible, by letter or by verbal means.

When a complaint is made, the GRM will acknowledge its receipt in a communication that outlines the grievance process; provides contact details and, if possible, the name of the GRM officer who is responsible for handling the grievance; and notes how long it is likely to take to resolve the grievance. Complainants will receive periodic updates on the status of their grievances. This GRM has established clearly defined timetables for acknowledgment and follow-up activities. And to enhance accountability, these timetables will be disseminated widely to various stakeholders, including communities, civil society, and the media.

4.3.3 STEP 3: Assessment and Investigation:

This step involves gathering information about the grievance to determine its validity and resolving the grievance. The merit of grievances should be judged objectively against clearly defined standards. Grievances that are straight forward (such as queries and suggestions) can often be resolved quickly by contacting the complainant.

Having received and registered a complaint, the next step in the complaint-handling process is for the focal points to establish the eligibility of the complaint received. The Grievances Registration Officer once a complaint or grievance is registered shall within 5 days assess the registered complaint or grievances to determine its validity and relevance i.e. is it within the scope of the SESRP-GRM as defined in this document. The following criteria can be used to assess and verify eligibility:

- The complainant is affected by the project.
- The complaint has a direct relationship to the project.
- The issues raised in the complaint fall within the scope of the issues that the GRM is mandated to address.

Having completed the complaint assessment, a response can be formulated on how to proceed with the complaint. This response should be communicated to the complainant. The response should include the following elements:

- Acceptance or rejection of the complaint
- Reasons for acceptance or rejection
- Next steps – where to forward the complaint
- If accepted, further documents and evidence required for investigation e.g. field investigations

Once the registered grievance or complaint has been determined as falling within the scope of this GRM, the focal point shall investigate the complaint. Investigation of the complaint may include the following:

- On site visit and verification.
- Focus Group discussions and interviews with key informers.
- Review of secondary records (books, reports, public records); and
- Consultations with local government and traditional authorities.

The SESRP will ensure that investigators are neutral and do not have any stake in the outcome of the investigation. At the end of the field investigation, the GRM officer shall compile a Grievance Investigation Report (GIR) using a standard template (**Annex IV**) on the

outcomes of the investigations and the specific recommendation to resolve the grievance or complaint.

4.3.4 STEP 4: Recommendation and Implementation of Remedies:

After the investigations, the GRM officer shall inform the AP of the outcome of the investigations and the recommended remedies if any. The AP shall be provided with written response clearly outlining the course of action the project shall undertake to redress the grievances and the specific terminal date by which the recommended remedies shall be completed. Potential actions will include responding to a query or comment, providing users with a status update, imposing sanctions, or referring the grievance to another level of the system for further action. The project will take some action on every grievance. If the recommended remedy involves monetary compensation, the GRM must then seek the approval of the Grievance Committee through the SESRP project coordinator.

The Aggrieved Party shall, provide a response agreeing or disagreeing with the proposed course of action within a minimum reasonable period after receiving the recommended actions.

4.3.5 STEP 5: Referral to the State Office:

In the likely event that the AP is not satisfied with the recommended remedy. The GRM officer shall forward the copy of Grievance Registration Form (GRF) and the Grievances Investigation Report (GIR) to the State GRM focal point (SFP).

The SFP shall once has received the GRF and the GIR from the District must conduct own investigations and complete his own GIR and communicate to the AP within 30 working days (i.e. repeat stages 2-3). The SFP in his recommendation shall take into consideration the reasons why the AP rejected the remedies offered by the district GRM focal point. He may decide to offer the same remedies as the GRM officer or different and improved offer.

Once the SFP has concluded the investigations and communicated to the AP. The AP shall have 7 days or less to agree or disagree with the proposed remedies. If the AP is agreeable to the remedy the SFP shall ensure that the remedy is implemented within the agreed time frame. For a remedy that requires monetary compensation the SPF submit the information to the relevant government department(s).

4.3.6 STEP 6: Referral to the Grievances Committee:

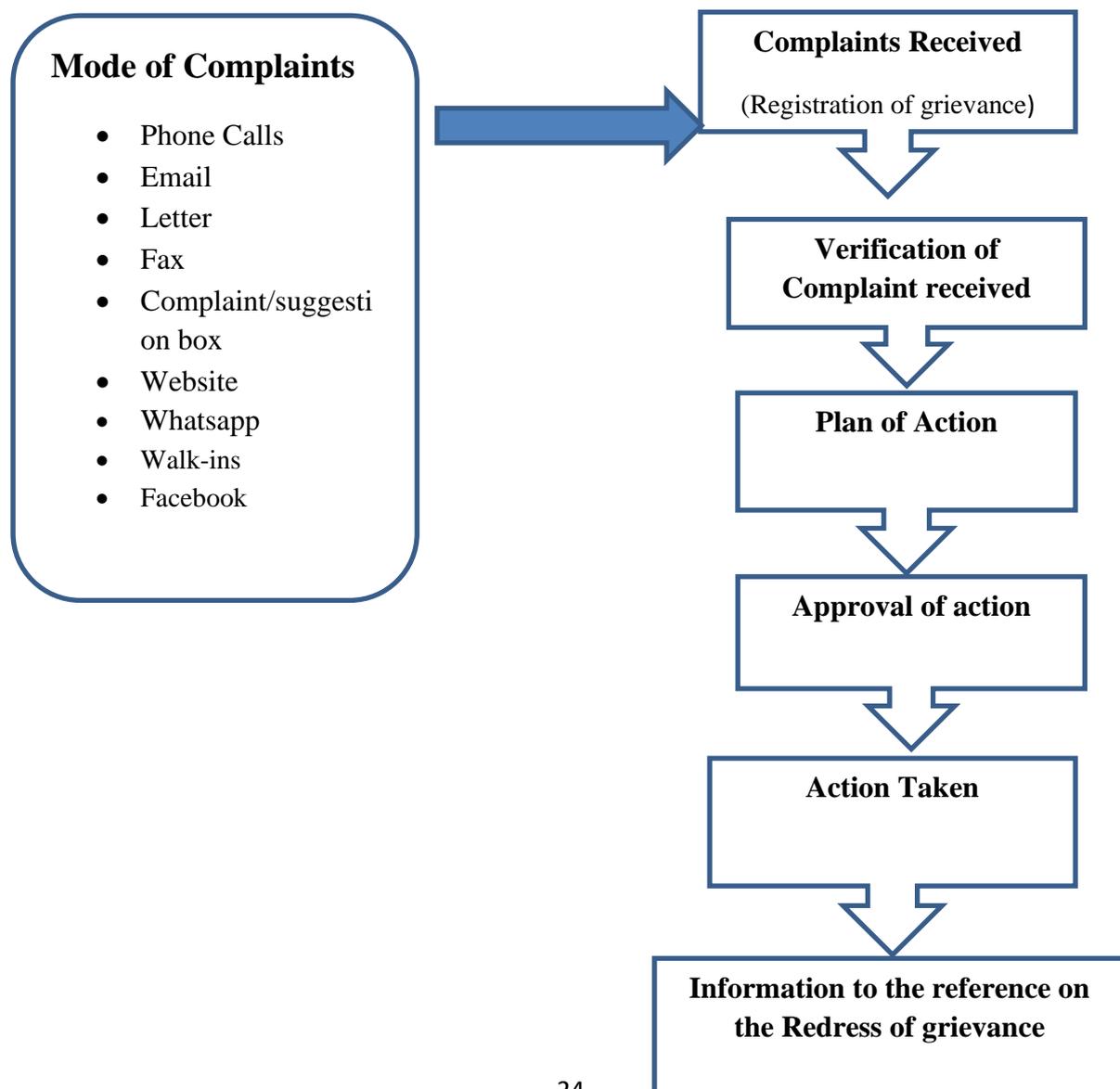
When the AP disagrees with the recommendation of the SFP, the SFP shall within 7 days of receiving the notice of rejecting the offer from the AP compile all the necessary documents regarding the grievance from district and the province to the Grievance Committee through the grievance Chairperson who will be elected by the Committee.

The government implementing partners at the national level shall investigate the matter further and taking into consideration the recommendation of the coordinator and PIU. The Environmental and Social safeguards Officers shall compile the GIR and submit to the Grievance Committee for consideration. Once the Grievance Committee arrives at a decision it is the responsibility of the SESRP to implement the remedies within the agreed time. If the AP disagrees with the remedy offered by the Grievance Committee, the AP reserves the right to appeal to other external GRMs outside SESRP.

The above-described steps and timeframes will be followed to address grievances emanating from implementing of project activities. For grievances that need quick and urgent attention, the described steps will be adhered to. However, in terms of timeframe, the grievances will be addressed in the shortest feasible period based on case-to-case basis.

For grievances that cannot be resolved at the project level, these will be reported and directed to World Bank Management through the GRS for further redress (see Figure 4-2): .

Figure 4-2: Grievance Flow in a basic GRM



4.4 Stakeholders Responsibilities in the Grievance Redress Mechanism:

STEP	RESPONSIBILITY	REMARKS
1.	Complainant	Aggrieved Project Affected Person (PAP) raises complaint to Scheme GR Committee (SGRC).
2.	Contract GRM Committee	Formed at the contract/activity level and includes members (project legal specialist, project technical ex and the contractor) and tasked with Assessment, Categorization of grievances, Reviewing and investigating of grievances and providing of solutions. If it is not resolved immediately, it is forwarded directly to tier 2 or through the legal specialist.
3.	Contractor	The Contractor resolves issues under his control. Any unresolved issues are elevated to Project Committee. (Contractors are contractually obliged to establish functional GRM)
4.	Project PIU	Consisting of the Project Implementation Unit (PIU) arbitrates grievances between the Contractor and the PAPs, those that he is unable to resolve, the project coordinator escalates to the Ministry Director General
5.	MoEWR	Arbitrate grievances of aggrieved parties and refer issues to relevant Government institutions at the appropriate level whenever necessary.
6.	Regional court	All the grievances not resolved by the agreed GRM or which the aggrieved persons are dissatisfied with in terms of resolution, will be reverted to the complainant who will channel them to the Somalia court system, starting at Regional Court level.

4.5 GRM communication channels

Telephone: +252610850613 / +252628850613

WhatsApp: +252610850613 /+252628850613

Email: grm.sesrp@gmail.com

5 Performance Standards of SESRP GRM:

To ensure that the SESRP GRM is effective and achieve the intended purposes, the Project Management is committed to the following performance standards:

- At each level of the GRM responsible officers shall take measures to ensure the protection of the Aggrieved Party from possible harassment from any other actors in the community.
- No Grievance/dispute shall be considered insignificant or more significant than other. All grievances shall be given equal consideration.
- All grievances will be treated with confidentiality and anonymity.
- All disputes submitted shall be acknowledged by issuance of a grievance acknowledgement form/receipt
- All grievances shall be recorded in grievances register and the register shall be maintained in a safe and secure place.
- The GRM officer shall have up to 21 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Compensation Committee shall have up to 30 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Aggrieved Party once feedback is provided shall have up to 7 days to respond to the relevant correspondence agreeing or disagree with the resolution.
- If the Aggrieved Party is awarded compensation, the compensation granted should be in such a way that it at least restores the AP to his original condition/status or makes them better.

5.1 Oversight, review and budgeting

The status of the development of the GRM, the levels of use by beneficiaries/ citizens, and the challenges of implementation will be discussed in semi-annual/annual portfolio meetings. An independent review/audit of the GRM, will be conducted prior to the mid-term review of the Project to assess the effectiveness and use of the mechanism and recommend improvements as necessary. An earmarked budget for the GRM will include the costs for the GRM related activities as described in the project GRM workplan.

6 Communication Plan for GRM:

In order to sensitize the various stakeholders (community, individuals etc.) about the GRM, there will be need to produce a number of Information materials such as brochures and posters that will educate the various stakeholders about the content of the GRM and how to access it. Additionally, radio programs will be produced to compliment education materials including translating the GRM into local languages. Other sensitization activities will include community meetings and public forums of the GRM.

6.1 Communicate to Build Awareness

Educating local people and contractors about the grievance redress mechanism is an essential and on-going responsibility. It does no good to have a perfectly designed GRM that no one knows about.

7.2 Communicating with Stakeholders/ Beneficiaries

For an effective operation of the Project GRM, its objectives and procedures will have to be properly communicated to those who will use it so that they will not only be eager to access it but also to own it, taking cultural peculiarity of each community into consideration.

The goal of communicating the GRM to stakeholders is to create awareness at a general level, to build skills and capacity at leadership level as well as to cause adjustment in behaviors and attitudes at the level of all stakeholders with a view to entrenching inclusion. To entrench this GRM as an efficient management tool for the SESRP-PIU, a combination of methods and media should be employed. The communication plan must consider the awareness creation and the behavioral change need of the stakeholders. There is the need for a sensitization forum with the various communities, to acquaint the stakeholders of the project with the guideline and workings of the GRM. A workshop will rally representatives of the states, local governments, traditional institutions as well as key groups and personalities in the project communities.

Accessing the grievance redress system will depend so much on the level of awareness about the mechanism among potential users. This therefore will require groups and mass methods as well as all the media forms available like the mass media, social media, and ministry website and grassroots mobilization.

7 Monitoring and Evaluation:

Monitoring and evaluation are critical to the success of any GRM. Monitoring refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them. The project monitoring and evaluation information system will also include indicators to measure grievance monitoring and resolution. These grievance redress indicators will be incorporated into project results frameworks.

Grievance Redress Mechanism (GRM) monitoring involves assessing the progress being made to handle grievances. The overall result of an effective GRM is to enable stakeholders affected by the SESRP project activities to receive timely feedback and appropriate responses. To achieve this result, specific targets are set, and overall improvement is tracked by a set of indicators. Monitoring will be conducted by the project safeguard officers using performance indicators, which are presented on two different outputs: participation and effectiveness after 3 months (quarterly).

For transparency, stakeholders will have an opportunity to track grievances as well. The social safeguard specialist will on a quarterly basis prepare a report and a list of existing and new grievances and share with stakeholders at all levels. The complaint, region/area and status of grievance handling will be made public.

Feedback—informing GRM users and the public at large about the results of investigations and the actions taken—enhances the visibility of the GRM among beneficiaries and increases users' trust in the system (making it more likely that they will lodge grievances). SESRP will provide feedback by contacting the complainant directly (if his or her identity is known) and/or posting the results of cases in high profile locations and conveying the results through radio broadcasts and other media.

The project will also inform GRM users about their right to an appeal if they are dissatisfied with the decision, specifying both internal and external review options (see Figure 7-1: Grievance Redress Mechanism).

7.1: GRM workplan.

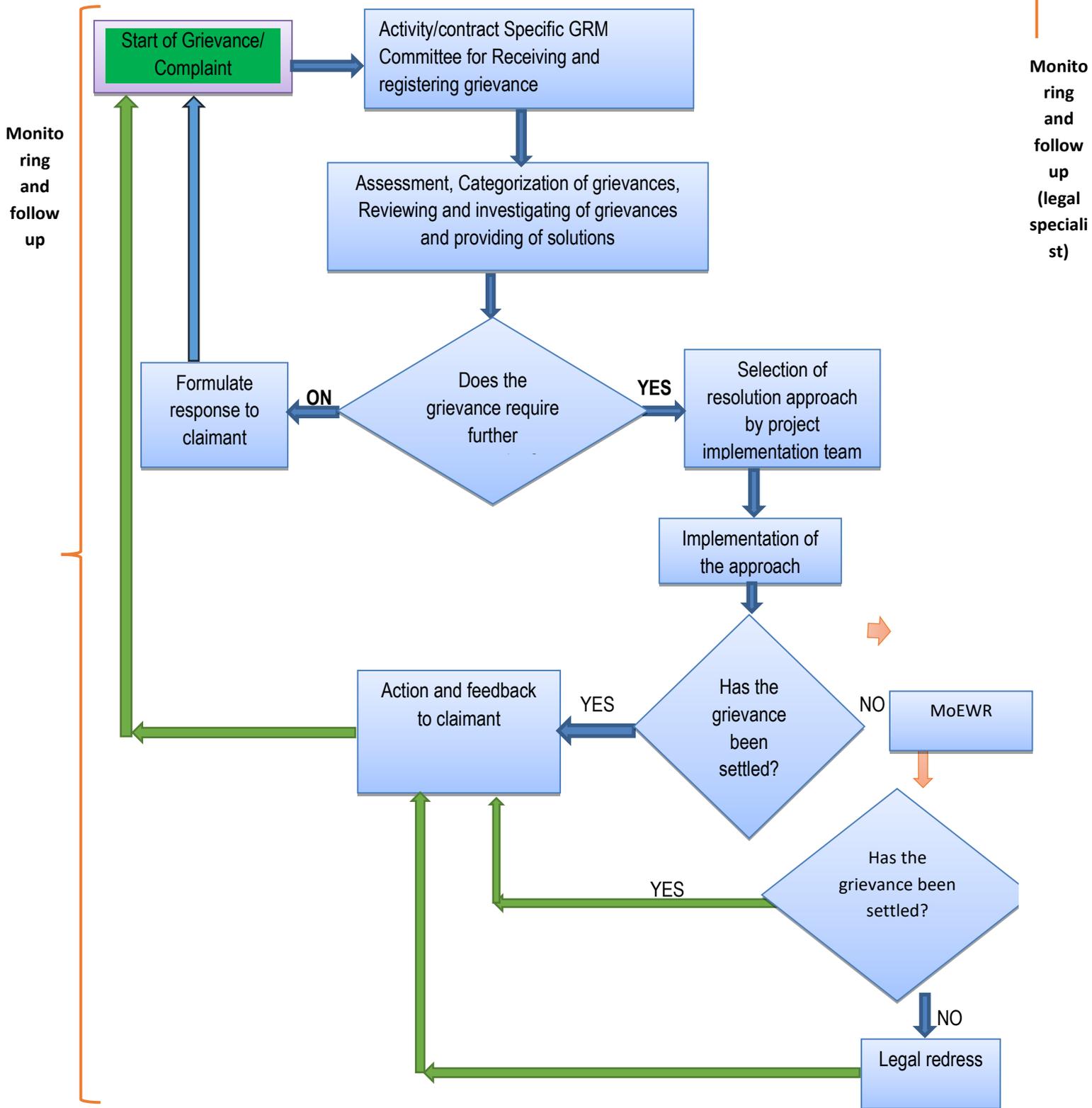
This GRM workplan covers the first year of the project, mainly dealing with workers and procurement related complaints, before the construction work starts. The SESRP GRM will be expanded once the construction activities start and a multiple tier GRM system will be established.

Project Grievance Redress Mechanisms

No.	Activity	Task	Responsibility	Timeline	Budget
1.	Establishment GRM contact channels Services	- Develop GRM contact channels (hotline, emails, phone numbers etc)	Safeguards / PIU	January – Throughout the project	\$500
		- Set up reporting system jointly (grievances submitted to GRC, PIU etc....)	Social Safeguards Specialist / PIU	Mid-July	\$1000
2	Establish Grievance Redress Committee	- Develop GRC ToR	Social safeguard	March	N/A
		- Training of GRC	Social specialist/PIU	Throughout the project	\$5000
3	Training of GRC, ESPs and PIU on implementation of GRM	- Produce training / information material (including hotline operation, setting up of help desks and suggestion boxes, management of grievances, management of SGBV grievances, reporting requirements, explain how to handle grievances brought to district authorities, explain how communities report and how grievances are handled)	Social Safeguards Specialist / Gender Specialist / PIU	March – Throughout the project	\$1000
		- Organize virtual training as PIU, GRC and MDAs and discuss concerns and potentially modify GRM modalities	Social Safeguards Specialist / PIU	Regularly	N/A
3.	Include GRM requirements into bidding documents	- Draft standard language for IP GRM responsibilities	Safeguards / PIU	May-December	N/A

4.	Monitoring of GRM implementation	- Set up monitoring system of GRM (schedule for monitoring visits, type of monitoring)	Safeguards / PIU	March – Throughout the project	N/A
		- Set up reporting / filing system for GRM (reporting streams – who, when and how often -, type of information to report from IP to PIU, type of info for quarterly reports to WB)	Safeguards / PIU	April-December	N/A
		- Analysis of data and learning, review of GRM	Social Safeguards Specialist / PIU	regular	N/A
		- Include GRM monitoring into IVA bidding process	Safeguards / PIU	As bidding is undertaken	N/A
		- Set-up monitoring requirements with IVA / training IVA in GRM	Safeguards	As IVA are onboarded	OW's/PIU
5.	Reporting on GRM	- Quarterly reporting to WB on GRM	Social Safeguards Specialists / PIU	Quarterly – responding to PIU reporting schedule	N/A

Figure 7-1: GRIEVANCE REDRESS MECHANISM PROCESS



8. ANNEXES

8.1 ANNEX 1: GRIEVANCE REGISTRATION FORM (GRM/001)

Date: _____ Grievance Number: _____

Plaintiff: _____
—

Cell Phone: _____ Village: _____

Chiefdom: _____ District: _____

Province: _____

Grievance Category (e.g. land, house, etc.):

Grievance location (Village, Ward, District): _____

Description of grievance: _____

Signature of Recording Officer: _____

8.2 ANNEX II: Acknowledgement Receipt (GRM/002)

Complaint no.: Date of issuing complaint:
(dd/mm/yyyy)

Place of issuing complaint:

Village/Town/City/Area:

District:

Details of the Complainant:

Name:

Age:

Address:

Gender:

..... Email address:

Phone no.:

Supporting documents submitted:

- i. ii.
- iii.
- iv.
-
- v.

Summary of complaint:

.....
.....
.....
.....
.....
.....
.....

Name of Officer receiving Complaint: _____

Signature of Officer receiving Complaint: _____

8.3 ANNEX III: Meeting Record Structure (Grievance Redress Committee & Other Meetings) (GRM/003).

Date of Meeting: Complaint no.: Venue of Meeting:

List of participants:

Complainant Side	Grievance Redress Committee Members
1) 2)	1) 2) 3)

Summary of Grievance:

.....

Key discussions:

- 1)
- 2)
- 3)
- 4)
- 5)

Decisions Made/Recommendations by the Grievance Redress Committee:

- 1)
- 2)
- 3)

Status of Grievance (tick where applicable):

Solved		Unsolved	
---------------	--	-----------------	--

Chair person's name: _____

Chair person's signature: _____

Date (dd/mm/yyyy): _____

8.4 ANNEX IV: GRIEVANCE INVESTIGATION REPORT (004)

PARTICULARS OF THE GRIEVANCE			
Name of Complainant:			
Grievance Reference Number:			
Grievance Category :			
Grievance Description:			
Grievance location (District, Ward, Village):			
TYPE OF INVESTIGATION CONDUCTED			
Field or Site Visit: Yes. () No. ()	Desk Review: Yes. () No. ()	Date Conducted:	
Key people consulted/interviewed:			
Description of the scope of the investigation:			
Summary of the findings:			
Recommendations			
Responsible/Investigation Officer Name:			
Signature:			
Designation:			
Date:			
FMS:			
Province			
District			

8.5 ANNEX V: Quarterly Report of Registered Complaints (GRM/005)

Location Date (dd/mm/yyyy) Period (Quarter ending).....

i. Details of Complaints Received:

Place of issuing complaint	Name & Address of complainant	Location of complaint/concern	Date of Receipt	Complaint no.

ii. Details of Grievance Redress Meetings:

Date of meeting	Venue of meeting	Names of participants	Decisions/Recommendations made

iii. Details of Grievances addressed:

Date of issuing complaint	Category of complaint	Category of grievance	Brief description of grievance	Date of complete resolution

(Note: Copy to be submitted to the Project Coordination Unit)

8.6 ANNEX IV: ToR for the Grievances Redress Committee

Within the scope of previous SEAP project, project level Grievances Redress Committees consisting of the energy department director general, PIU legal advisor, environmental and social safeguard specialists and gender advisor was formed. SESRP project will continue to use these committees and work with them to make it more efficient and functional in the first year of the project. The community level GRC, which will be established after the first year, will representing community,

vulnerable groups, CSOs as well as pertinent government ministries at state and local levels. The project level GRC will Members of the committee are familiar with the World Bank's GRM procedures, safeguards Law of Somalia and other pertinent national regulations.

Some the tasks expected from the grievances redress committees (GMCs) are listed below.

- Reviews the admissibility of each complaint against the national and World Bank's policies and regulatory obligations and decides which procedures to follow.
- In the context of the handling of admissible complaint, and in accordance with the Grievances Redress Mechanism, the committee
 - a) Acknowledges the receipt of complaints lodged with the GRC.
 - b) Gathers and reviews existing information on the subject under complaint.
 - c) Conducts appropriate inquiries with a view to assessing whether the World Bank's GRM policies and procedures have been followed.
 - d) Coordinates different services involved to obtain all possible internal information and opinions on the complaint.
 - e) Ensures appropriate stakeholder engagement through fact-finding, mediation, conciliation, and dialogue facilitation whenever appropriate.
 - f) Coordinates with other organizations and stakeholders whenever appropriate.
 - g) Reports on findings, makes recommendations regarding corrective actions (addressing the complaint) and/or possible improvements of existing procedures and issues the conclusion report.
 - h) Drafts appropriate replies to the complainants or refer it to higher level in the allocated time
 - i) Ensures that imposed and/or agreed delays and notices are respected.
 - j) Fosters the adherence to the World Bank's and national safeguard policies,
- The GRC will regularly reports on its activities by issuing quarterly reports on the status of complaints and issues an annual activity report.
- In addition to the handling of complaints, the Committee contributes to the establishment, implementation and communication of strategies, policies, procedures relating to the handling of complaints.
- The GRC assists the MoEWR and SESRP-PIU the identification of possible improvements to the implementation of its activities.
- To raise the awareness of possible future complaints, the GRC reviews internal documents and follows the activities of external stakeholders which are active regarding the operations SESRP project.