

**FEDERAL GOVERNMENT OF SOMALIA**



**Ministry of Energy and Water Resources (MoEWR)**

**Grievance Redress Mechanism (GRM) Implementation Plan**

**Somalia Electricity Sector Recovery Project (SESRP)**

**AUGUST 2023**

## **LIST OF ABBREVIATIONS**

|       |   |
|-------|---|
| AP    | Affected Persons                              |
| CSR   | Corporate Social Responsibility               |
| ESIA  | Environmental and Social Impact Assessment    |
| ESF   | Environment and Social Framework              |
| ESMF  | Environmental and Social Management Framework |
| ESPs  | Electricity Service Providers                 |
| FGS   | Federal Government of Somalia                 |
| FMS   | Federal Member State                          |
| GBV   | Gender Based Violence                         |
| GIR   | Grievance Investigation Report                |
| GRC   | Grievance Redress Committee                   |
| GRF   | Grievance Registration Form                   |
| GRM   | Grievance Redress Mechanism                   |
| HIV   | Human Immunodeficiency Virus                  |
| IDPs  | Internally Displaced Persons                  |
| MoEWR | Ministry of Energy and Water Resources        |
| NGO   | Non-Governmental Organizations                |
| PAPs  | Project Affected Persons                      |
| PIU   | Project Implementing Unit                     |
| RAPs  | Resettlement Action Plan                      |
| SEA   | Sexual Exploitation Abuse                     |
| SESRP | Somalia Electricity Sector Recovery Project   |
| SFP   | State GRM Focal Point                         |
| SMS   | Short Message Service                         |
| VMGs  | Vulnerable Member Groups                      |

**WB World Bank**  
**TABLE OF CONTENTS**

|  |     |
|--|-----|
| TABLE OF CONTENTS .....  | iii |
| 1. INTRODUCTION .....  | 5   |
| 1.1 Introduction to Grievance Redress Mechanism (GRM): .....                 | 5   |
| 1.2 GRM Scope and Principles .....   | 9   |
| 1.3 1.3 Objectives of the GRM.....   | 10  |
| 1.3.The Project GRM .....  | 10  |
| 2. Legal Framework.....  | 11  |
| 2.1 Somalia Legal Framework .....  | 11  |
| 2.1.1 Provisional Constitution of the Federal Republic of Somalia. ....      | 11  |
| 2.1.2 Somalia Labour Code of 1972.....                                       | 11  |
| 2.1.3 The Puntland Sexual Offences Act 2016 prohibits sexual harassment..... | 12  |
| 2.2 World Bank Environment and Social Standard 2.....                        | 12  |
| 3. Potential Sources of Grievances: .....                                    | 13  |
| 3.1 GRM Institutional Framework .....  | 14  |
| 3.2 Grievances Risk Rating.....  | 19  |
| 3.3 GRM Training Program .....   | 22  |
| 4. GRM IMPLEMENTATION STEPS .....  | 23  |
| 4.1 Step 1: Focal Point Persons .....  | 23  |
| 4.2 Step 2: Receiving and Registering Complaints .....                       | 25  |
| 4.3 Step 3: Screening, Assessing and Referring Complaints .....              | 26  |
| 4.4 Step 4: GRM Coordination.....  | 27  |
| 4.4.1 Level 1: Community Level GRCs .....                                    | 27  |
| 4.4.2 Level 2: District Level GRCs .....                                     | 28  |
| 4.4.3 Level 3: Regional Level .....  | 28  |
| 4.4.4 Level 4: State Level GRCs .....  | 28  |
| 4.4.5 Level 5: National Level GRCs .....                                     | 28  |
| 4.5 Step 5: Formulate a Response .....                                       | 28  |
| 4.6 Step 6: Grievance Redress Resolution Approach.....                       | 29  |
| 4.7 Step 7: Implement the Approach .....                                     | 30  |
| 4.8 Step 8: Settle the Issues.....   | 31  |
| 4.9 Step 9: Track, Document, and Evaluate the Process and Results.....       | 31  |

|        |   |    |
|--------|---|----|
| 4.10   | Dealing with Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)  | 32 |
| 4.11   | Workers GRM   | 35 |
| 4.12   | Referral of Grievances to State GRM   | 36 |
| 4.13   | World Bank’s Grievance Redress  | 37 |
| 4.14   | Stakeholders Responsibilities and Consultation in the Grievance Redress Mechanism | 37 |
| 4.14.1 | Stakeholders Responsibilities in the Grievance Redress Mechanism                  | 37 |
| 4.14.2 | Stakeholder Engagement / Consultation and Disclosure                              | 38 |
| 4.15   | Institutional Arrangements:   | 42 |
| 5.     | GRM BUDGET AND WORK PLAN  | 43 |
| 5.1    | GRM Budget  | 43 |
| 5.2    | GRM Work plan   | 44 |
| 3.     | MONITORING AND EVALUATION   | 50 |
| 4.     | ANNEXES   | 51 |
| 5.3    | Annex I: Complaint Register for Individual  | 51 |
| 5.4    | Annex II: Investigation Outcome / Resolution                                      | 52 |
| 5.5    | Annex III: Incident Classification Guide  | 53 |
| 5.6    | Annex IV: Guidelines for Empathetic, Survivor Centric Recording of Complaints     | 57 |
| 5.7    | Annex V: Informed Consent Process:  | 58 |
| 5.8    | Annex VI: GBV/SEA/SH Case Registration Form                                       | 59 |
| 5.9    | Annex VII: GBV/SEA/SA Referral Services   | 60 |
| 5.10   | Annex VIII: Grievance Redress Mechanism Process                                   | 61 |
| 5.11   | Annex IX: TOR for the Grievance Redress Committee                                 | 63 |
| 5.12   | Annex X: TOR for Grievance Redress Specialist                                     | 65 |
| 5.13   | Annex XI: TOR for GRM Hotline Operator  | 66 |
| 5.14   | ANNEX XII: Grievance / Complain Log / Register                                    | 67 |

## 1. INTRODUCTION

### 1.1 Introduction to Grievance Redress Mechanism (GRM):

The World Bank recognizes that major infrastructure projects around the world are stalled due to disputes over land, water, and labour resources. Ignoring such disputes or responding too late is often costly to the projects. The World Bank is committed to ensuring that all its funded projects create opportunities for early and efficient redress of grievances and that there are alternative dispute resolution methods to manage the grievances.

The 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 clarifications about a project are responded to systematically, problems that arise out of implementation are resolved and grievances are addressed efficiently and effectively.

In line with the World Bank ESS 10, the objective of this GRM is establish a systematic approach to stakeholder engagement which will guide the MoWER in identifying stakeholders and building and maintaining a constructive relationship with them, in the SESRP and all the affected parties. Moreover, it provides the project-affected parties including the project workers with accessible and inclusive means to raise concerns and grievances, and also guide on the resolution steps to manage such grievances.

The GRM is also aimed at examining the level of stakeholder interest and support for the SESRP and to enable MoWER to incorporate stakeholders' views in the project design and environmental and social performance during the operational phase. It is through the set procedures that the project shall achieve effective and inclusive engagement of and timely disclosure of E&S potential risks to affected parties (PAP) throughout the project life cycle on issues that is or could potentially affect them.

The GRM proposal for environmental projects such as the SESRP is two-fold as it includes both a worker's GRM and the larger Project GRM.

1. The Workers GRM promotes the implementation of a systematic approach to improving the management of risks and impacts related to labor and working conditions in projects. The objectives of the workers GRM is to provide project workers with accessible means to raise workplace concerns and to ensure fairness in the treatment of all project workers.
2. The Project GRM recognizes the importance of open and transparent engagement among all project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. The objective of the project GRM is to provide

project-affected parties with accessible and inclusive means to raise issues and grievances and allow the PIU to respond to and manage such grievances.

**Table 1.1: Benefits of GRM**

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

A systematic and functional GRM shall be adopted to address the concerns of aggrieved parties (PAPs, vulnerable groups including women, IDPs, gender-sensitive issues (GBVA/SEA/SH), 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 below.

Figure 1-1: Simplified GRM Process

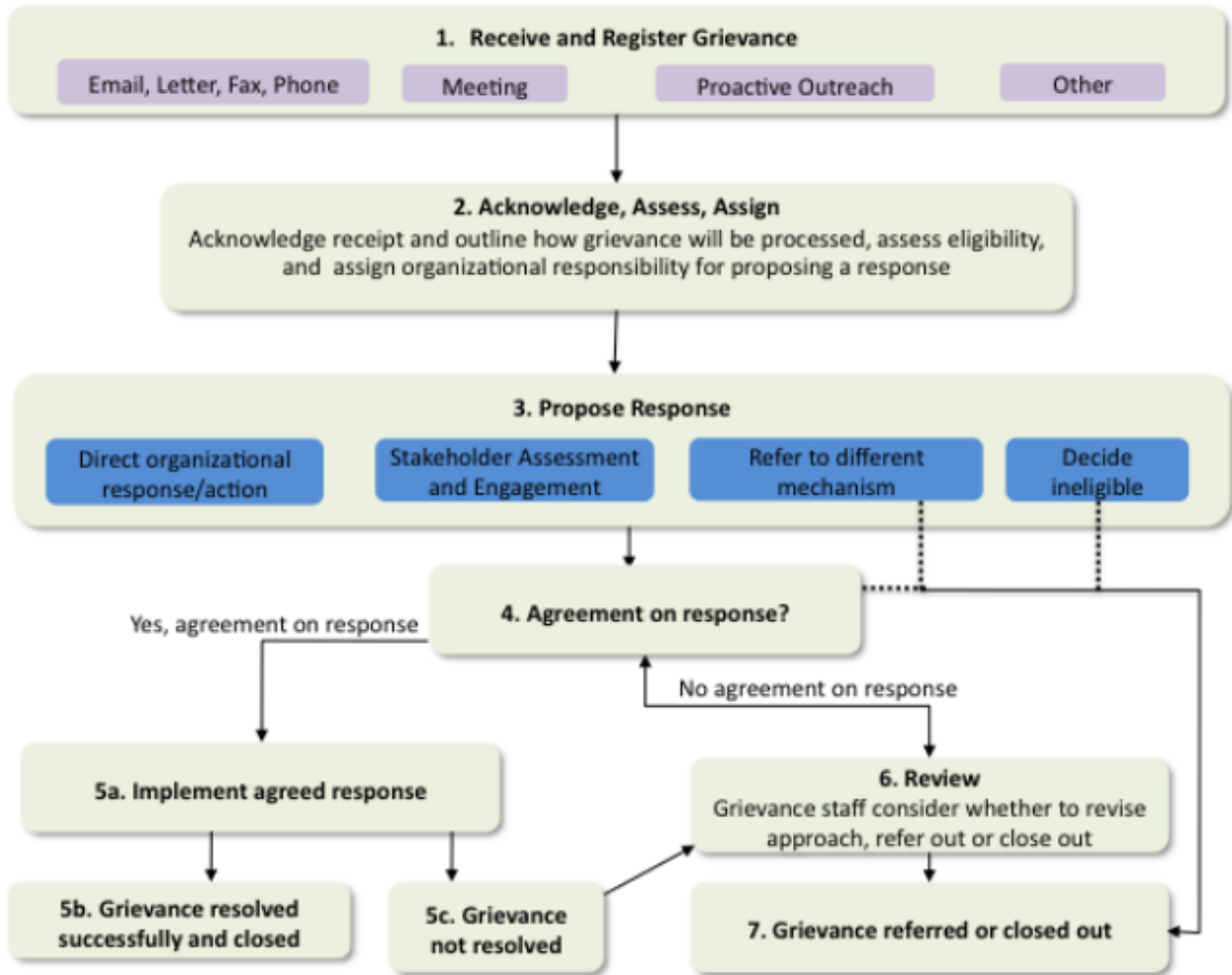
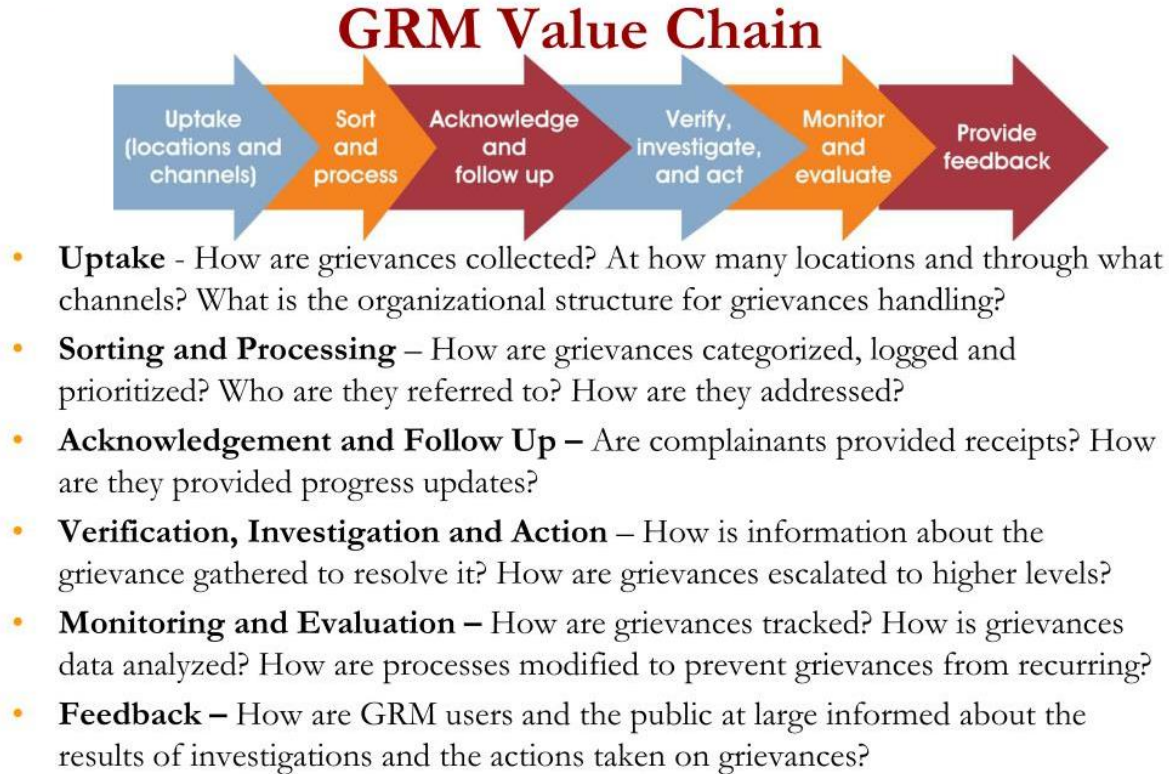


Figure 1-2: GRM Value Chain



The Federal Ministry of Energy and Water Resources (MoEWR) will ensure there is an enabling environment/system to accommodate any unanticipated environmental or social risk and impact arising 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 within the project zone of influence. Alternative means of access, however, will be the public information centers that will be established at various project sites.

The GRM reporting centres will be at Federal, State and District levels. The PIU will be part of the GRM mechanisms at the Federal level and other GRM levels will be established in line with the commencement of activities and construction work at the State and District levels. Contractors also set up GRM reporting facilities and report incidents received to the PIU GRM. The Ministries of Education and Health will also be part of the GRM reporting centres and report the OSH incidents to the main GRM center.



The current GRM Reporting Center is at the PIU (Federal) level and other GRM levels will be established in line with the commencement of activities and construction work at the State and District levels. Information about the GRM reporting centers at all levels (federal, state and district) shall 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.

## **1.2 GRM Scope and Principles**

The Project shall establish 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 scope of this Project GRM applies to all projects supported by the World Bank through Investment Project Financing. The WB through the PIU will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation. Stakeholder engagement is the continuing and iterative process by which the PIU identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable groups.

To achieve the goal of this GRM of providing a suitable easily accessible avenue for PAPs to express their E&S-related concerns and guide on how to effectively resolve such grievances, the following principles shall apply:

- **Accessibility:** The GRM will be accessible to everyone affected by the project. It is available and shall 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 in honest manner.
- **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 shall be consistent with applicable national standards and shall not restrict access to other redress mechanisms.
- **Feedback:** The GRM will serve to channel citizen feedback to improve project outcomes for the people.

### **1.3 1.3 Objectives of the GRM**

#### **1.3.The Project GRM**

The primary purpose of this Project GRM is to respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the PIU will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.

The detailed objectives of the Project GRM are as follows:

- To establish a systematic approach to stakeholder engagement that will help the PIU to identify stakeholders and build and maintain a constructive relationship with them, in particular project affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow the PIU to respond to and manage such grievances.

■

## **2. Legal Framework**

### **2.1 Somalia Legal Framework**

#### **2.1.1 Provisional Constitution of the Federal Republic of Somalia.**

Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.

Article 20 of the Constitution of Somaliland: Work, Trade, and the Welfare of Employees with the following provisions:

1. All able citizens have a right and a duty to work.
2. The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.
3. All employees have a right to payment appropriate to the work they undertake, and are free to enter into agreements with their employers on an individual or collective basis.  
Forced labour is prohibited.

Provisional Constitution of the Federal Republic of Somalia Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place

#### **2.1.2 Somalia Labour Code of 1972**

Somalia Labour Code of 1972 stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

Somalia Labour Code of 1972. The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances.

Somalia Labour Code of 1972. Workers have the right to submit complaints and the employer must give the complaints due consideration.

Somalia Labour Code of 1972. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.

Somalia Labour Code of 1972. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.

Somalia Labour Code of 1972. The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.

### **2.1.3 The Puntland Sexual Offences Act 2016 prohibits sexual harassment**

The Puntland Sexual Offences Act 2016 prohibits sexual harassment

Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences.

Every labour law shall comply with gender equality.

Dismissal for pregnancy. All women have a special right of protection from discrimination.

## **2.2 World Bank Environment and Social Standard 2**

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Somalia will uphold and promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. All project workers (direct and contracted) will be required to abide and meet the objectives of ESS2 including but not limited to:

- To promote safety and health at work.
- To promote the fair treatment, non-discrimination, and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

### **3. 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 labour / 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 (centre vs. periphery) communities and the consequent perception of project citing as more favourable 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.
- Workers grievances - Accidents or injuries due to construction.
- Potential risk of social conflict with communities because of labour influx, including forms of Gender Based Violence (GBV) / Sexual Exploitation Assault (SEA) / Sexual Harassment.
- Insecurity.
- Equipment installation e.g., poles and cables running through or above homes and other privately owned properties.

**3.1 GRM Institutional Framework**

The GRM is intended to be implemented on federal, state, district and municipality levels. The framework for the institution of the GRM will take a hierarchical approach as shown below;

Figure 3-2: GRM Institutional Framework

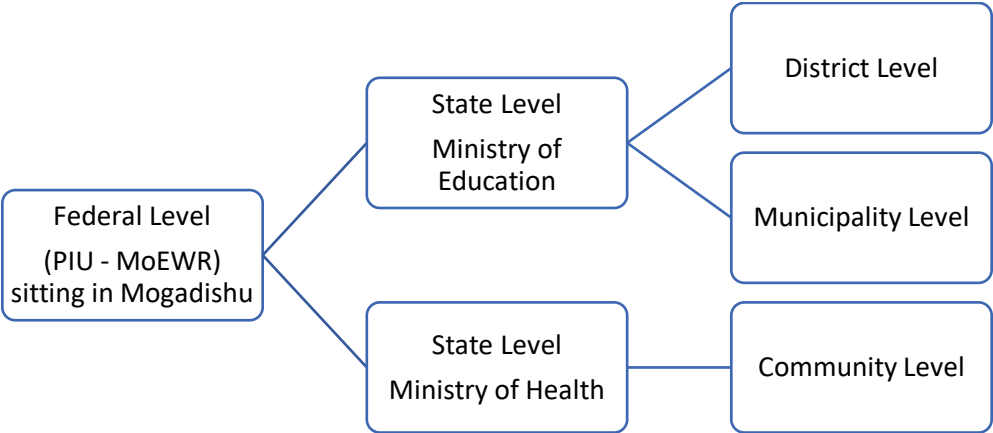


Figure 3-1: GRM Institutional Framework

The GRM will be a project wide GRM that will also be available for use by PAPs. The GRM will work interconnected with local level actors at the FMS, Regional Level, 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 Municipality /Local Government level, a Grievance Redress Committee (GRC) shall be established and composed of local leaders, municipal representatives, the project, community-based organizations, Legal Aid and law enforcement agencies. The 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 etc. 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.

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 Stakeholder Engagement Plan (SEP), the Labour Management Procedures, Environmental and Social Management Framework (ESMF), the SESRP as well as national and international laws, conventions and policies as they relate to the practice of grievance redress.

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 (Somalia Labor Code, Transitional Constitution of Somalia) that necessitates the establishment of grievance redress mechanism for the project. Field consultations (documented in the Project SEP) 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.

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 3-1 below.

**Table 3-1: Potential Grievances, Presentations and Responding Authority**

| <b>Project Component</b> | <b>Project Intervention Activity</b>                               | <b>Potential Nature of Grievance</b>                                    | <b>Tools for Presentation</b>   | <b>Ultimate Responding Authority</b> |
|--------------------------|--|---|---|--------------------------------------|
| <b>1</b>                 | Distribution network reconstruction, reinforcement, and operations | - Land related matters, e.g., poles and cables running through or above | - Physical complaint,<br>- Written petitions,<br>- Official Emails,<br>- Phone calls & SMS to GRM hotlines, | MoEWR, PIU and ESPs,                 |

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



| Project Component | Project Intervention Activity | Potential Nature of Grievance | Tools for Presentation                                    | Ultimate Responding Authority |
|-------------------|-------------------------------|-------------------------------|---|-------------------------------|
|                   |                               | - Security related matters    | - Official Emails, Phone calls & SMS to<br>- GRM hotlines |                               |

. The GRM will be in place and functional throughout the project life cycle, until completion of all construction activities to the point that the project is decommissioned after achieving all expected deliverables. A separate mechanism will be developed to address worker grievances, which will be referred to as the Workers GRM. Grievances under the Workers GRM will be resolved by the contractors GRM has been established as early as possible in project development and supported by appropriate human and financial resources before start-up and function throughout project life, including operation and decommissioning.

The GRM will be a project wide GRM that will also be available for use by PAPs. The GRM will work inter-connectedly with local level actors at the FMS, Regional, Community, District, and municipal levels. This is to ensure that all measures are taken to address the grievance. The GRM will be housed at MoEWR (FGS) 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) has been established and is composed of the Director of Energy Department, project Legal Aid, Gender Specialist, Environmental and Social Safeguard Specialists of the project (see Annex VIII). State, Municipality and Community Level GRCs 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. NB aspect of gender representation shall be taken into consideration to ensure no gender is disadvantaged.

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

**Toll Number: 487**

**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, these complaints shall be documented in the separate GBV and SEA /HS Action Plan.

The GRM implementation process will involve the following steps:

- The safeguards specialists at MoEWR (FGS) 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 a period not later than 30 days for serious cases and 60 working days for catastrophic cases. The complainant shall be given an opportunity for appeal if not satisfied with resolution approach, findings or recommended remedy.
- 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, they are within their discretion to refer the complaint to the court of Law.
  -

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),
- GRM specialists, E&S 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 Costumer Care hotlines

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

**Toll Number: 487**

**Telephone:** +252610850613 / +252628850613

**WhatsApp:** +252610850613 /+252628850613

**Email:** grm.sesrp@gmail.com

### 3.2 Grievances Risk Rating

The potential grievances that may emerge from SESRP have different rating in terms of effects the grievance may have on the various stakeholders of the project and the Project Affected Persons (PAPs). Grievance rating may be weighed based on the Project Affected Person (PAP) or institution affected (beneficiary, government, or World Banks) and the nature of effect (degree of intensity and geographic spread). The rating based on nature of effect may variably scaled across the various categories of grievances.

For example, an effect could be rated based on:

- Acuteness depending on whether it causes fatality (death) or casualty (injuries)
- Rights violated (consider the constitutional bill of rights and fundamental freedoms), and
- Administrative concerns (abuse of office, negligence of duty) among others.

SESRP will need to identify and rate all the potential risk-based grievances See Table 3-2 below:

Table 3-2: Grievance Rating

| Category of grievances | Rating (1-5)      | Effects  |  |  |
|------------------------|-------------------|--|--|--|
|                        |                   | Beneficiaries  | Government   | World Bank   |
| Basic information      | 2-3<br>Indicative | <ul style="list-style-type: none"> <li>• Lead to discrimination</li> </ul> | <ul style="list-style-type: none"> <li>• Reputation</li> </ul> | <ul style="list-style-type: none"> <li>• Reputation</li> </ul> |

| Category of grievances                             | Rating (1-5)     | Effects  |   |  |
|--|------------------|--|---|--|
|  |                  | Beneficiaries  | Government  | World Bank   |
| Public administrative justice                      | 3-4 Serious      | <ul style="list-style-type: none"> <li>• Poor standard of services</li> <li>• Discrimination</li> <li>• Marginalization</li> </ul>                             | <ul style="list-style-type: none"> <li>• Reputation</li> <li>• Effectiveness</li> </ul>   | <ul style="list-style-type: none"> <li>•</li> </ul>  |
| Violation of human rights and fundamental freedoms | 4-5 Catastrophic | <ul style="list-style-type: none"> <li>• Fatality</li> <li>• Causality</li> <li>• Discrimination</li> <li>• Marginalization</li> </ul>                         | <ul style="list-style-type: none"> <li>• Bad governance</li> <li>• Violation of human rights and freedoms</li> <li>• Reputation</li> </ul>            | <ul style="list-style-type: none"> <li>• Violation WB policies</li> <li>• Supporting violation of human rights</li> <li>• Reputation</li> </ul>    |
| Corruption and economic crimes                     | 4-5 Catastrophic | <ul style="list-style-type: none"> <li>• Poor services</li> <li>• Discrimination</li> <li>• Marginalization</li> </ul>   | <ul style="list-style-type: none"> <li>• Credibility issues</li> <li>• Wastage of taxpayers' monies, economic burden</li> <li>• Reputation</li> </ul> | <ul style="list-style-type: none"> <li>• Funds ineffectiveness</li> <li>• Supporting bad governance</li> <li>• Reputation,</li> </ul>              |
| Labor relations                                    | 3-4 Serious      | <ul style="list-style-type: none"> <li>• Fatality</li> <li>• Causality</li> <li>• Unfairness</li> <li>• Human rights</li> </ul>                                | <ul style="list-style-type: none"> <li>• Bad governance</li> <li>• Reputation</li> </ul>  | <ul style="list-style-type: none"> <li>• Violation of WB policies</li> <li>• Supporting violation of human rights</li> <li>• Reputation</li> </ul> |
| Environmental compliance violations                | 3-4 Serious      | <ul style="list-style-type: none"> <li>• Fatality</li> <li>• Causality</li> <li>• Human rights</li> <li>• Discrimination</li> <li>• Marginalization</li> </ul> | <ul style="list-style-type: none"> <li>• Bad governance</li> <li>• contravening international C&amp;I</li> <li>• Reputation</li> </ul>                | <ul style="list-style-type: none"> <li>• Violation of WB policies</li> <li>• Contravening international C&amp;I</li> <li>• Reputation</li> </ul>   |

| Category of grievances             | Rating (1-5)        | Effects  |   |  |
|------------------------------------|---------------------|--|---|--|
|                                    |                     | Beneficiaries  | Government  | World Bank   |
| Occupational safety and health     | 4-5<br>Catastrophic | <ul style="list-style-type: none"> <li>• Fatality</li> <li>• Causality</li> <li>• Human rights,</li> </ul> | <ul style="list-style-type: none"> <li>• Bad governance</li> <li>• Violation of human rights and freedoms</li> <li>• Contravening international C&amp;I</li> <li>• Reputation</li> </ul>    | <ul style="list-style-type: none"> <li>• Violation of WB policies</li> <li>• Supporting violation of human rights</li> <li>• Reputation</li> </ul> |
| Civil wrongs and criminal offences | 4-5<br>Catastrophic | <ul style="list-style-type: none"> <li>• Fatality,</li> <li>• Causality</li> <li>• Human rights</li> </ul> | <ul style="list-style-type: none"> <li>• Bad governance,</li> <li>• Violation of human rights and freedoms,</li> <li>• Contravening international C&amp;I,</li> <li>• Reputation</li> </ul> | <ul style="list-style-type: none"> <li>• Violation of WB policies</li> <li>• Supporting violation of human rights</li> <li>• Reputation</li> </ul> |
| .....<br>...                       |                     | •  | •   | •  |

Note that the Ratings 1-3 (Indicative), Ratings 3-4 (Serious) Ratings, and 4-5 (catastrophic) are based on frequency of occurrence and severity of the grievance. The bank and all relevant local authorities shall be notified of any catastrophic incidences within 24hrs upon first reach out while notification for serious events shall be done within 72hours. The resolution time for the various grievances shall depend on the nature of the grievance and the investigation approach required but shall not exceed 30 and 60 working days for serious and catastrophic cases respectively. Indicative cases shall be attended to immediately and risks managed within a period not exceeding 1week for remedies, which do not require financial resources. Those, which require financial interventions, shall be tabled to the management by the AP and SFP at various levels depending on the size of budget required.

### **3.3 GRM Training Program**

The GRM Training Program will cover the principles and elements of a GRM like effective communicating for understanding, emotions management. The program will target the community, the GRCs, the GRC focal persons, members of the MoEWR and any project stakeholders. The GRM training program is meant to enlighten project stakeholders on the how grievances are handled during the subsistence of the project. The overall goal of the program is to empower the PIU and other project stakeholders to view a GRM as an integral part of effective project management. The following issues will be taught during the GRM training program:

- The meaning of grievance and grievance redress mechanism
- The scope, principles, and objectives of GRM
- The GRM process – receiving, registering, screening, assessing a grievance, formulating a response to a grievance, implementing the response to a grievance, settling disputes, referring disputes to various organs in the GRM and appealing decisions from the GRM process.
- Identification of Focal persons in the GRM for the stakeholders to know where to direct grievances and complaints as well as the roll of the focal persons in the GRM process.
- GRCs and their role in the GRM
- Monitoring and Auditing GRM processes

Adult learning principles will be used to facilitate the learning of the participants. Where technology allows, the training will be conducted hybrid, through online and in person. Particularly, instruction techniques such as interactive lecture, exercises and group discussion will be used to enhance participants' learning.

The training program will emphasize on the understanding of background issues, politics, sensitivities, precedents, local history, language, and culture as well as having detailed information and a survey of relevant perceptions (as well as facts) related to the project and to any cases associated with it. Additionally, the focus of the training will be on the guiding principles governing treatment of affected persons (APs), relevant legislation, each stakeholders' role in the process, and the limits of GRMs.

#### 4. GRM IMPLEMENTATION STEPS

The GRM implementation process needs to ensure that grievance redress is timely responsive and effective. 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’s Social Safeguards specialists will manage the fully operationalized project GRM.

The process of implementing a GRM involves the following steps:

- Assign focal points,
- Receive and register complains,
- Screen and refer the complaints,
- Coordinate with the GRMs,
- Formulate the response,
- Select the resolution approach,
- Implement the approach,
- Settle the issues, and
- Track, document, and evaluate the process and results.

##### 4.1 Step 1: Focal Point Persons

The GRM envisions multiple focal points/levels to receive and register grievances. The choice of the level to submit and resolve grievances depend on the nature of concerns, understating of the aggrieved party, and institutional credibility (see Table 2-1). Since each of these levels have implications on the project, the level at which the grievances may be submitted will be established and operationalized. *If the project level GRM levels fail to resolve a case, the complainant is free to seek redress from other mechanisms such as the Somali legal / judicial systems or the World Bank’s GRM, which includes the Grievance Redress Service (GRS).* However, whatever level is chosen, care will be observed not to obstruct justice including referral of concern to institutions considered credible.

**Table4-1: GRM Resolving Levels**

| <b>Tiers Levels</b>   | <b>Proposed Tiers Membership</b>  |
|---|---|
| <b>Tier 1</b> <ul style="list-style-type: none"> <li>• Community Level</li> <li>• Contract/ activity</li> </ul> | 1. Community Elders (Xeer)<br>2. Village Courts<br>3. Resident Engineer             |
| <b>Tier 2</b> <ul style="list-style-type: none"> <li>• SESRP Project level</li> </ul>                           | 1. Project implementation unit (PIU) Safeguards Team<br>2. GRM Specialist / Officer |
| <b>Tier 3</b> <ul style="list-style-type: none"> <li>• National Level</li> </ul>                                | 1. Project coordinator<br>2. Director General of MoEWR                              |

The focal point persons in the GRM at each level are qualified to handle (receiving and registering) grievances. 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 identify the focal point persons from community to national level and their tasks formulated accordingly.

The GRM focal point persons shall be drawn from different state agencies such as valuation officers, engineers, contractors and land officers or from the community opinion leaders. This team would not be having the essential skills and the capacity to engage in the effective grievance resolution process. The GRM focal point persons will be provided with adequate training and orientation on grievance resolution. Such capacity building should start immediately after setting up the GRM and be integrated during the project implementation. The subject matter for the training and orientation programs should include the following:

- Procedural training on receiving, registering, and sorting grievances,
- Conduct of initial grievance assessment;
- Effective communication, negotiation, and facilitation skills;
- Management of grievance redress process (developing flow chats, assigning roles, monitoring performance of staff dealing with complaints, and their respective parameters, standards, and techniques;
- Reporting Timelines ranging from near miss, incidents and and
- Documentation and reporting, including the use of “customer feedback” as part of an ongoing organizational learning process for the implementing agency.

Table 4-2: Stakeholders Responsibilities in the Grievance Redress Mechanism

| <b>Step</b> | <b>Responsibility</b>  | <b>Remarks</b>   |
|-------------|------------------------|--|
| 1.          | Complainant            | <ul style="list-style-type: none"> <li>• Aggrieved / Project Affected Person (PAP) raises complaint to Scheme GR Committee (SGRC).</li> </ul>  |
| 2.          | Contract GRM Committee | <ul style="list-style-type: none"> <li>• Formed at the contract / activity level, includes members of 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.</li> </ul> |
| 3.          | Contractor             | <ul style="list-style-type: none"> <li>• The Contractor resolves issues under his control.</li> </ul>  |



|    |                |   |
|----|----------------|---|
|    |                | <ul style="list-style-type: none"> <li>Any un-resolved issues are elevated to Project Committee. (Contractors are contractually obliged to establish functional GRM)</li> </ul>   |
| 4. | Project PIU    | <ul style="list-style-type: none"> <li>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</li> </ul>                                   |
| 5. | MoEWR          | <ul style="list-style-type: none"> <li>Arbitrate grievances of aggrieved parties and refer issues to relevant Government institutions at the appropriate level whenever necessary.</li> </ul>   |
| 6. | Regional court | <ul style="list-style-type: none"> <li>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.</li> </ul> |

**4.2 Step 2: Receiving and Registering Complaints**

Any grievance can be brought to the contract/ activity (the lowest project implementation unit) grievance mechanism committee in writing, calling, Hotline **number:478, WhatsApp (+252610850613 /+252628850613), SMS (+252610850613 /+252628850613)**, verbally in a face-to-face situation, **email (grm.sesrp@gmail.com)**, or by filling in the complaint/grievance register form (Annex I & Annex XII). Complainants can choose to identify themselves or to remain anonymous or use third parties to report the complaint/grievance on their behalf. In addition, grievances may be reported to the local police stations. Where a complaint is registered to the local police authorities, the complaint should be redirected to the project GRM.

The project GRM is also open to receive complaints directly from APs or via third party. Whatever the source and the form in which the complaint is received, it shall be accepted by the focal points and registered in a grievance / complaint register (Box 1).

It is also recommended that uniformity be maintained in the complaint registration systems across different sections and agencies of the project. Annex I & XII provides a format to record and register a complaint.

The grievance logbook will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The information to be recorded will include:

**Box 1: The complaint register:**

Each PIUs shall maintain a public complaint register (book) in which complaints received by project staff, either in written or verbal form, are entered.

A complaint register includes:

- Reference number,
- Date of the complaint,
- Name, age, gender of the complaint/s,
- National identification number/s,
- Address of the complainant/s,
- Summary of the complaint,
- Date information on proposed corrective action sent to complainant (if appropriate),
- The date the complaint was resolved and closed,
- Date response was sent to complainant, and
- Signature of the complaint/s.

### **4.3 Step 3: Screening, Assessing and Referring Complaints**

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 of the complaint received. The following criteria shall be used to assess and verify eligibility:

- The complainant is identifiable and has provided a name and contact details.
- The complainant is affected by the project.
- The complainant 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.

A further assessment is recommended of the *seriousness* of the complaint – classified in terms of high, medium, or low Indicative, serious or catastrophic– and its impact on both the complainant and the project. To assess the seriousness of the complaint; the following criteria will be used:

- Severity of the problem,
- Potential impact on the well-being of the individual or group,
- Potential impact of the project and
- Public profile of the issue.

Assessing the severity of a complaint will require additional data to be collected through field visits to the sites, discussions and interview with complainants and other relevant persons or groups in the community, and crosschecking the information already provided.

Once a grievance passes the eligibility criteria, the focal point person in the level at which the grievance was reported will start investigations on the complaint. If the complaint is not eligible, the complainant shall be informed of the reasons, and be informed accordingly.

#### **4.4 Step 4: GRM Coordination**

GRCs do not operate in a vacuum. They are embedded in networks of agencies and actors, and in the course of their operations may relate to PAPs, GRM implementers, their executing and support agencies, project implementers, intermediaries used for presenting complaints, and World Bank. Coordination among different actors in GRM process, as well as among other external agencies and actors with whom the GRMs interact in their operations. PIUs will be the central point of coordination, the coordination functions of such a central body could include:

- Facilitation of case referrals to appropriate agencies;
- Tracking and monitoring grievance resolution processes and their outcomes by different agencies;
- Maintaining a central database of complaints received and their current status;
- Analysing data and preparing regular updates and progress reports for the involved agencies with proposed follow-up activities
- Establishing feedback loops with relevant agencies and the APs to communicate and report case progress and status;
- Identifying capacity building needs of the GRM members, and overseeing the conduct of such capacity building training
- Identifying awareness creation needs among relevant agencies and communities, and overseeing the conduct of such awareness building programs
- Liaising with media and monitoring media reports; and
- Giving feedback to project management.

In the SESRP, a number of GRCs will be formulated and shall be coordinated by the SESRP Environmental and Social Safeguards Team and their coordinating functions include conducting periodic meetings and workshops (sometimes with the participation of the PAPs) to review GRC performance and address the problems and issues encountered by GRCs, making appointments and replacements of the GRC members, providing feedback to relevant agencies and authorities, facilitating financial requirements of the GRCs, and maintaining a central database of the grievances dealt with by the GRCs. The following GRCs will be established:

##### **4.4.1 Level 1: Community Level GRCs**

At the community level, the GRC members are selected by the community and from each project community. The community level GRCs will be made up from members of the clan elders (*xeer*) and other prominent members of the village. Each clan in the project area will submit one clan elder to be part of the GRC at the community level. The chairperson of this GRC will be appointed

by the rest of the GRC members. The one third-gender rule will be applied to ensure gender and ethnic balance and representation of women.

#### **4.4.2 Level 2: District Level GRCs**

The district level GRCs will consists of a representative from the community level GRC, a member of the business community in the district, religious leader's representation and at least 2 members of the district council. The chairperson of this GRC will be the mayor of the district of the project area or a person appointed by the mayor. The one third-gender rule will be applied to ensure ethnic and gender balance and representation of women.

#### **4.4.3 Level 3: Regional Level**

The regional GRC will comprise members of the regional council, representatives of the business and religious leaders at the regional level. The Regional level GRC will have a representative from each District Level GRC. The chairperson of this GRC will be the Governor of the Region or a person appointed by the Governor. The one-third rule will be applied to ensure the participation of VMGs and women.

#### **4.4.4 Level 4: State Level GRCs**

Somali has about 6 federal states which are made up of regions. The federal states are semi-autonomous and in the case of Somaliland and Puntland, the states have their own Presidents and claim to be independent from Somali.

The GRCs at this level include representatives from the Ministries dealing in energy and infrastructural projections. These members will be supplemented with a member for the regional level GRC from each region of the state. The chairperson of the GRC will be the Minister in the relevant energy and infrastructural development ministry or a person appointed by the Minister. The one-third rule will be applied to ensure the participation of VMGs and women.

#### **4.4.5 Level 5: National Level GRCs**

The National PIU in collaboration with Ministry will identify from the implementing and executing agencies to form the National GRC. At PIU, the Project Coordinator, Environment and Social Safeguards Officers, Communication Officer, Component Coordinator and Representatives of the PAPs among others will form the National Level GRC. The one-third rule will be applied to ensure the participation of VMGs and women.

#### **4.5 Step 5: Formulate a Response**

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

- Acceptance or rejection of the complaint;
- Reasons of acceptance or rejection;

- Next steps-where to forward the complaint;
- A time frame; and
- (If accepted) further documents or evidence required for investigation, e.g., field investigations.

#### **4.6 Step 6: Grievance Redress Resolution Approach**

This GRM has presented the multiple approaches for grievance redress. The approaches are easy, culturally and socially acceptable to the PAPs. This GRM will provide people with avenue to participate in the grievance redress process comfortably and without any fear of intimidation or retaliation. The grievance redress approaches have created adequate space for the active participation of the PAPs, including vulnerable groups. The proposed approaches to grievance redress include:

- Mediation through local and traditional institutions such as Clan leaders, Village elders, Imams, temple priests, or community-based organizations that have a close understanding of the issues affecting their community members; these local institutions shall be integrated into the formal GRMs; for example, the GRCs in the SESRP shall draw members from among village organizations or Clan leaders so that they would provide the community perspective on the issues been addressed;
- Negotiation: Parties seek to confer together to settle differences over a matter. They may disagree over some or all the terms of the deal or agree on most of the terms.
- Facilitation of settlements among disputants through mediation boards;
- Direct negotiations and dialogue between the PAPs and the relevant agency or agencies;
- Arbitration / Facilitated negotiations through a third party: the disputes are resolved outside the courts. One or more persons, who renders the “arbitration award”, make the decision.
- Investigation of the complaint through review of documents, field investigation, assessments from technical agencies, and/or interviews of different parties; and
- Legal remedies: A legal remedy, also judicial relief or a judicial remedy is the means with which a court of law, usually in the exercise of civil law jurisdiction, enforces a right, imposes a penalty, or makes another court order to impose its will.

Depending on the nature and the severity of the complaint/s, the chairpersons of the grievance GRM, in consultation with the PAPs, shall identify and decide on an approach for grievance resolution.

Where appropriate, PAPs shall be given the choice of selecting an affordable approach with which they are comfortable and confident and that is beneficial to them.

Approaches and processes adopted by GRM depends on the nature of complaints. For SESRP project based GRM, PAPs should be informed of the following:

- Who constitutes the GRM?

- Where is the GRM located?
- How should the complaint be reported or referred to the GRM?
- Who can accompany the complainant to the GRM?
- What steps are followed in the inquiry or resolution process?
- What documents and evidence are needed in support of the complaint?
- How much time is needed to initiate and conclude the grievance redress process?

This information should be part of a simple brochure that explains the different grievance redress possibilities for PAPs.

#### **4.7 Step 7: Implement the Approach**

The following are important aspects shall be considered in the implementation of SESRP GRM:

- Creating a conducive environment for the PAPs to relate their grievances without fear of intimidation;
- Allowing the PAPs (if necessary) to be accompanied by a third party, e.g., a family member or a fellow villager with whom they feel comfortable to present their grievances;
- Undertaking field inspections (if necessary) to assess and verify the grievance reported;
- Referring the complaints for technical assessments (if necessary) to validate and establish the real causes of the grievances,
- Minimizing investigative processes and unnecessary referrals to other parties;
- Avoiding delays;
- Referring to the relevant laws, rules and regulations that bind the decision-making processes, e.g., technical officers, to provide additional information required;
- Creating opportunities for negotiation and exchange;
- Setting clear and objective criteria for decision making, e.g., different compensation rates for people living in different evacuation zones, i.e., dangerous zones vs. inconvenient zones, rather than having a flat rate for everybody; or compensation packages for different losses as prescribed in the payment matrix;
- Assuring the PAPs that decision –making processes are independent and fair;
- Documenting the grievance redress process and its outcome; and
- Communicating the grievance redress outcome to the PAP and the relevant agencies (Box 2).

#### **Box 2: Documentation and Communication in the SESRP:**

In the SESRP, the following formats are currently being used for documentation and communication:

- Format in annex I and Annex XII: is filled in by the secretary of the grievance redress mechanism (GRC) for recording the grievance redress process and its final outcome and recommendations immediately after the GRC proceedings are over. All GRC members sign

this report, and copies are forwarded to GRC members, deputy project directors, project managers, all SESRP PIUs, and other relevant parties such as project engineers and environmental specialists. However, the project-affected persons (PAPs) are not given a copy of this report. Instead, the decisions of the GRC are communicated by the GRC secretary to the APs in a separate letter.

#### **4.8 Step 8: Settle the Issues**

A contract/ activity grievance redress committee (GRC) shall be set chaired by the Social Safeguard Specialist who will ensure complainants are able to register their grievances easily. The committee will assess the grievance and try to resolve it. In the event the matter is beyond the committee to deal with, the same will be referred to the project Implementation Unit. Project – based GRM has proposed a variety of strategies to settle grievances, including:

- Requesting the relevant agencies responsible for the grievance to take appropriate measures to remove the cause of grievance,
- Signing agreement between PAPs and the project for solutions mutually agreed upon;
- Assuring the PAPs to address their grievances at the end of completing the project related work e.g., the assurance letters are issued by the contractors or the project executing agency in Somalia; and
- Initiating a monitoring process to assess any further impacts of project-related work on the properties and livelihoods of the APs.

#### **4.9 Step 9: Track, Document, and Evaluate the Process and Results**

The GRCs have the responsibility for tracking and monitoring the process of grievance redress and the implementation of the decisions made and of seeing that redress is granted to PAPs in a timely and efficient manner. They also have the responsibility for giving regular feedback to the complainant about the progress of the grievance redress process. The monitoring shall include the progress of implementation of grievance resolutions and the timeliness of grievance redress, follow up grievance to be sure they are attended to, and document details of complaints received and the progress in solving them. Grievances provide information to project managers about project implementation and actual and potential problems.

In the SESRP, the PIUs, apart from its other roles, has been effectively used for tracking and monitoring the progress of complaint – handling processes. The engineers, supervision consultants, and the Safeguards Team will jointly monitor the status of handling project related grievances by the contractor at the monthly meetings. Progress reports on the status of the complaint resolved and on new complaints received by each party are presented for review and follow up at these monthly meetings. In addition, databases on complaints resolved and on new complaints received shall be maintained and updated by both SESRP.

An evaluation system shall assess the overall effectiveness and the impact of the GRCs. Such evaluations can take place either annually or biannually, and their results shall contribute to improving the performance of the different GRCs and provide valuable feedback to project management. The following questions can be addressed in such evaluations:

- How many complaints have been raised?
- What types of complaints have been raised?
- What is the status of the complaints (rejected or not eligible, under assessment, action, agreed upon, action being implemented or resolved)?
- How long did it take to solve the problem?
- How many PAPs have used the grievance redress procedure?
- What were the outcomes?
- Are the GRCs effective in realizing the stated goals, objectives, and principles?
- Are the GRCs capable of responding to the range of grievances specified in their scope?
- Are the GRCs equipped with adequate and diverse set of resolution approaches?
- Have the GRCs adopted measures to improve the resolution approaches, e.g., capacity building, consultation, with technical experts, etc.?

The above information is important for project management to see trends of complaints, detect flaws in implementation, take timely corrective action, and make strategic changes where needed. It also provides valuable feedback about PAPs' satisfaction with the project and thus contributes to a good reputation for the implementing and executing agencies.

#### **4.10 Dealing with 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 survivor 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.

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 I- & Annex XII).

The GM Operators will be trained on key protocols including referral, reporting and informed consent protocols and on the survivor centered approach to receive those cases in an appropriate manner and immediately forward it to the GBV/SEA/SH referral system.

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:

1. 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.
2. Psychological support for victims and witnesses, which may need to include trauma counseling for victims of sexual violence or harassment
3. Legal advice for victims, whistleblowers, witnesses, and alleged perpetrators
4. Measures that support reintegration into the workforce (e.g., counseling)
5. Child-protection support services and/or expertise for reports involving children.

NB: These multi-sectoral 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.

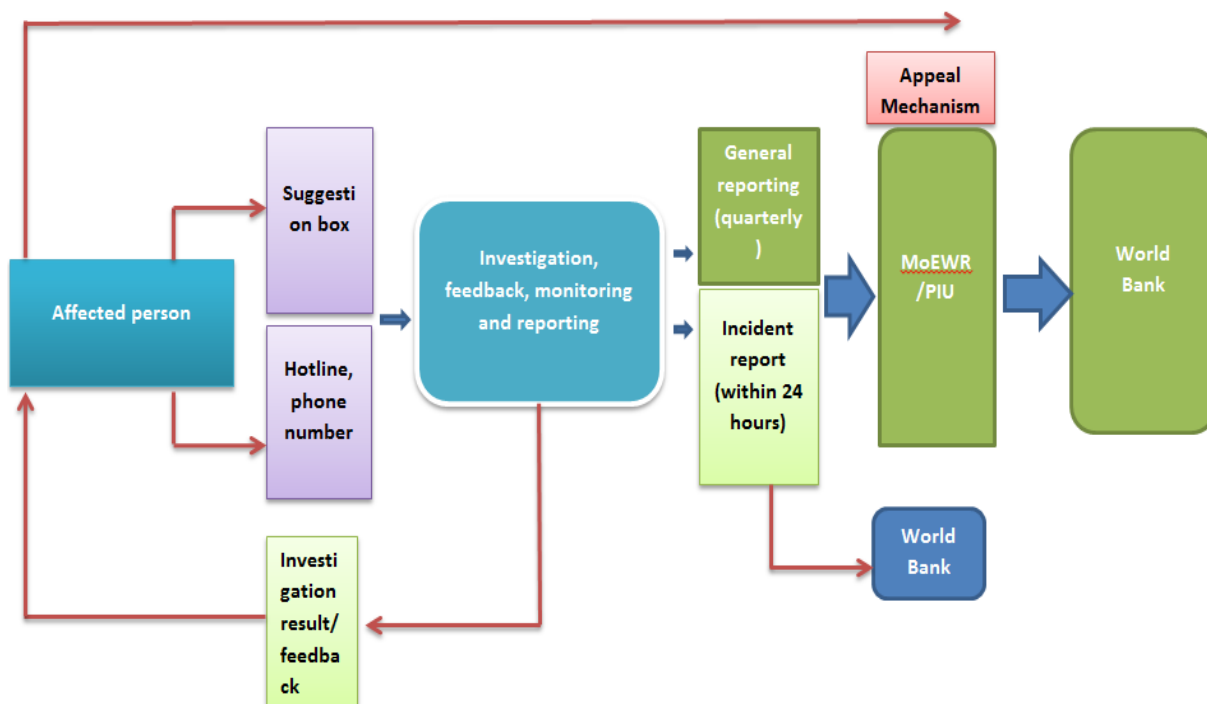


Figure 4-1: GBV Complaints to the PIU and World Bank

**Toll Number: 487**

**PIU: Telephone: +252610850613 / +252628850613**

**WhatsApp: +252610850613 /+252628850613**

**Email: [grm.sesrp@gmail.com](mailto:grm.sesrp@gmail.com)**

#### **4.11 Workers GRM**

Workers in the project are a special category of project stakeholders who may face unique grievances during the project. A separate mechanism will be developed to address worker grievances., which will be referred to as the Workers GRM. The primary purpose of the Workers GRM shall be to provide for all workers with an avenue to raise workplace concerns. This shall be implemented in line with the Project Labour Management Plan that has been developed. The scope of the Workers GRM which will be developed shall be to create a systematic approach to improving the management of risks and impacts related to labor and working conditions in projects. The Workers GRM shall seek to engage project workers and their representatives on labor issues, including with representatives of workers organizations where they exist; helps inform the assessment of labor risks and impacts, by providing useful context and additional information.

The detailed objectives of the workers GRM are as follows:

- To promote safety and health at work.
- To promote the fair treatment, non-discrimination, and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, migrant workers, contracted workers, community workers, and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

The project workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.

The Workers GRM will be run by the contractors and consultant involved in the project. The Project GRM will be run and maintained by the PIU as well as the consultant

The grievance mechanism shall have a different approach to worker related cases and shall be the responsibility of the contractor

Each contractor shall nominate a dedicated officer for the handling and reporting of grievances, the GRM Focal Point, and should appoint a GRM Team, which will be drawn into identifying solutions for relevant grievances

The project coordinator under the Consultant should be informed in a case a worker grievance is reported to them, the only information they should establish is if the incident involves, the worker(s) involved in the grievance, and the nature of the grievance. The nature of grievances for the workers can be categorized as either:

- Grievances relating to working conditions or working hours.
- Grievances relating to wages.
- Sexual harassment grievances
- Grievances amongst co-workers

The grievances by workers will be addressed by the project coordinator.

**Toll Number: 487**

**PIU: Telephone:** +252610850613 / +252628850613

**WhatsApp:** +252610850613 /+252628850613

**Email:** grm.sesrp@gmail.com

#### **4.12 Referral of Grievances to State GRM**

In the likely event that the AP is not satisfied with the recommended remedy up to the regional level, the grievance shall be forwarded to the State GRM focal point (SFP) in the form of the Grievance Registration Form (GRF) and the Grievances Investigation Report (GIR).

The SFP upon receiving the referral of a complaint must conduct investigations and complete his own GIR and communicate to the AP within 30 working days for serious grievances and 60 working days for catastrophic events. Indicative grievances shall be managed immediately preferably within a period not exceeding one week. An updated grievance register shall be kept including all the three categories of grievances and availed as required. The SFP in his recommendation shall take into consideration the reasons why the AP rejected the remedies offered by the lower-level 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 up to 10 working days to agree or disagree with the investigation findings and 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). The incident register shall be updated as appropriate and monitoring and reporting done on the recommendation measures.

If the AP is not agreeable to the remedy, they have 10 working days to issues the SFP with a notice of rejecting the offer. The SFP shall within 10 workingdays of receiving the notice of rejecting the offer from the AP compile all the necessary documents regarding the grievance 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.

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.

#### **4.13 World Bank's Grievance Redress**

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org). It is however recommended that a project level grievance mechanism that has been agreed upon by all stakeholders is put in place early, to prevent small matters from snowballing into conflicts that may lead to delayed disbursement and implementation.

#### **4.14 Stakeholders Responsibilities and Consultation in the Grievance Redress Mechanism**

##### **4.14.1 Stakeholders Responsibilities in the Grievance Redress Mechanism**

Table 4-3 below gives the role of the stakeholders' responsibilities in the grievance redress mechanism:

Table 4-3: Stakeholders Responsibilities in the Grievance Redress Mechanism

| STEP | RESPONSIBILITY        | REMARKS   |
|------|-----------------------|---|
| 1.   | Complainant           | Aggrieved Project Affected Person (PAP) raises complaint to GR Committee (GRC).   |
| 2.   | Contract GR Committee | Formed at the contract/ activity level, includes members (project legal specialist, project technical expert and the contractor), and tasked with: <ul style="list-style-type: none"> <li>• Assessment, Categorization of grievances,</li> <li>• Reviewing and investigating of grievances and</li> <li>• Providing of solutions.</li> </ul> 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.  |
| 4.   | Project PIU           | Consisting of the Project Implementation Unit 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.   |
| 7.   | World Bank Somalia    | If a grievance has been raised with the PIU, and no satisfactory response has been received, as a second option through GRS, the complainant can reach out to WB Somalia.<br>Email: somaliaalert@worldbank.org  |
| 8.   | World Bank Washington | If no satisfactory resolution has been received from the World Bank Country office, grievances can be escalated to the World Bank Office in Washington.   |

#### 4.14.2 Stakeholder Engagement / Consultation and Disclosure

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. For this reason, stakeholders' engagement started early in the

project cycle because it guarantees the ‘social license to operate’ by signaling to communities and other local stakeholders that their views and well-being are considered important.

In this section, consultations with key stakeholders with regards SESRP, and the implementation of project components.

First round of Stakeholder consultations was held on April 28th 2021 (Somaliland) and on 22nd, 24th to 26th May, 2021 for FGS (Somalia). Additional Stakeholder Engagement was held during the month of June as from 15th to 30th 2021 in the FMS, all this have been and has been documented. Stakeholder consultations is a continuous process built in to project design and will continue throughout the project implementation. Subsequent E&S assessment operations will ensure that stakeholder concerns are taken into account.

Stakeholder consultation were made with the following government institutions: Federal Ministry of Energy and Water Resources, Directorate of Environment & Climate Change at the OPM, Puntland Ministry of Public Works, Ministry of Environment Puntland, Puntland Ministry of Labour and social affairs, South West Directorate of the Environment, South West - Ministry of Energy and Water Resource, South West – Ministry of labour and social affairs, South West – Ministry of Public Works, Jubaland – Ministry of Energy, Jubaland Ministry of Environment and Jubaland Ministry of Public Works. . In Somaliland, consultations were held with Ministry of Environment and Rural Development, Ministry of Energy and Minerals, Ministry of Public Works and the Somaliland Lawyer Association, Hargeisa Water Agency. More consultation was done with the Electricity Service Providers including: Blue Sky, WESCO, NEPCO, Baidoa Electric Company, Solar chain technology, Safa Energy, Tamarso, Solar Chain Tech, Dalsan Power and SunMax. The Leaders of the IDPS at several camps were also consulted as one of the vulnerable groups. Summary of the outcome is documented on Table 4-4:

Table 4-4: Stakeholder Engagement on Labour Related issues

|   |   |   |   |
|---|---|---|---|
| <p>Labor and Work and Grievance Redress Mechanism</p> | <p>1. What are the existing mechanisms and who is responsible for solving labour related issues?<br/>                 2. The role of the Ministry of Labour<br/>                 3. Labour inspections at field levels e.g. forced labour</p> | <p>Ahmed Ali, from the Federal Ministry of Labor and Social Affairs working for the Department of Legal and Labor Relations responded to several question related to the major concerns of the labor and related issues. He provided overall explanation of this sector in which he highlighted the existing challenges and the recent achievements including the development of key labor, work and social protection related policies and strategic plans.<br/><br/>                 Despite these achievements, still huge gaps exist in terms of the Ministry’s capacity to</p> | <p>Support the Ministry’s capacity to control, monitor and develop the workers’ rights, dispute resolution and their protection.<br/><br/>                 Develop, implement and</p> |
|---|---|---|---|

|  |   |   |   |
|--|---|---|---|
|  | <p>4. The kind of support the Ministry provides to the workers e.g. occupational health and safety.</p> <p>5. Child labour and labour influx.</p> <p>6. The existing mechanisms for social protection and the support they expect from the project.</p> | <p>control, monitor and develop the workers' rights, dispute resolution and their protection.</p> <p>He also shared that ILO is supporting the Government of Somalia in conducting country child labor situational assessment and development of national action plan.</p> <p>The Federal Ministry of Labor and Social Protection under the Department of Labor Relations have resolved many labor disputes including the recent airport workers and its employers, Favori LLC.</p> <p>While responding to labor-related risks, he pointed out that women and youth are selected for daily labor works on local construction sites. Construction companies may rely on the fact that they are vulnerable and needy, and because they don't understand their rights, they are often abused, they are paid low wages compared to other</p> <p>Mrs. Abshira A. from the Ministry and Labor, Youth and Sport (MoLYS), responded to several questions as she explained the labor related issues in Puntland. She explained that, Puntland's labor law No.65 usually governs the labor related issues and concerns and his is also in line with ILO labor conventions. In addition, Low No. 65 is also referred during the labor and work related grievances and disputes.</p> <p>In addition, she explained the confusion that exists between the national and international standards regarding the child labor as Children aged 15 are not normally employed and are not regarded as a child labor. On the other hand, she expressed their concerns with regards to balancing the conflicting demands of child labor and the need for income</p> | <p>monitor GRM for the project</p> <p>Develop and implement LMP and OHS Plan for workers.</p> <p>Conduct regular supervision and regular labor inspections of construction works to identify potential OHS risks and compliance with OHS plan</p> <p>Provide necessary personal protective equipment (PPE) to all field officers directly involved in construction activities.</p> <p>Set-up and operate a Labor specific GRM for workers, as per LMP</p> |
|--|---|---|---|



|  |  |   |  |
|--|--|---|--|
|  |  | <p>especially the poor households who are usually female headed households. And finally she admitted that they allow certain jobs – usually light work- and supportive role to be assigned for such children.</p> <p>Mr. Faisal also pointed out that, the labor inspection units are not functional. Usually, the PIU of the World Bank funded project are responsible to inspects the workers condition such as OHS and remuneration, working hours, wages, timing and forced labor.</p> <p>He also added that, at project level, usually the contractors provide labor management plan; this stipulates the labor rights and code of conducts.</p> | <p>Impacts of labor influx driven by the small medium scale infrastructure works will be managed by the LMP, including a code of conduct for project workers</p> |
|--|--|---|--|

#### **4.15 Institutional Arrangements:**

The PIU coordinator has the main responsibility for the implementation of the GRM. The GRM Team within the PIU consists of the Environmental Safeguard Specialist, Social safeguards Specialist and the Project Coordinator. The GRM will be facilitated implemented and monitored by the Social Safeguards Specialist. The GRM specialist will receive, and process grievances directed to the PIU, manage appeals mechanisms, monitor the implementation of the GRM through the Hotline Operator and the contractors, manage the Hotline Operator, and register and file all GRM reports incoming from contractors, as well as compile all relevant GRM data and include reports on the GRM in the regular reports to the WB. The Specialist is further responsible for the monitoring of GRM implementation, and the identification of trends and analysis of the GRM reports to be able to flag key issues with Project Management.

Each GRM Focal Point is responsible to create awareness of the GRM at its locality of operation; roll-out information dissemination; prepare and man help desks at project sites; run a suggestion box at the project site (nearest office of administration); receive and handle grievances addressed at the contractors (through help desks, suggestion boxes and directed by the Hotline Operator). The PIU's Social Safeguards Specialist will be sharing all necessary information with the contractors on this matter, and will monitor the contractor's awareness, creation of their own GRM system, the implementation of help desks at project sites and the handling of grievances by the contractors.

## 5. GRM BUDGET AND WORK PLAN

### 5.1 GRM Budget

SESRP GRM has developed a realistic budget that will sufficiently cover the costs of its operations such as facilitation, operationalization, disclosure, awareness campaigns, capacity-building training, field inspections, meetings, and documentation. This GRM budget has been developed to guide the implementer in planning for the same. For this case, Table 5-1 below is the proposed GRM Annual Budget:

**Table 5-1: Typical GRM Budget**

| S/No. | ACTIVITY  | QUANTITY                       | BUDGET (USDs) |
|-------|---|--------------------------------|---------------|
| 1     | Awareness campaigns (how many? Frequency? No. of persons involved? No. of days, stationery, transport/fares, allowance)                                   | 40                             | 20,000        |
| 2     | Establishment of GRM Committees (how many? Frequency of establishment meetings? No. of persons involved? No. of days? Stationery, fuel/fares, allowances) | 20                             | 10,000        |
| 3     | Capacity building sessions (how many? Frequency of trainings/ meetings? No. of persons involved? No. of days? Stationery, fuel/fares, allowances)         | 4 training @ with 30 delegates | 30,000        |
| 4     | Disclosure (printing of materials, stationery, mapping of the disclosure points, allowance, transport/fares, etc)   | Bulk Printing lump sum         | 20,000        |
| 5     | Field inspections (how many? Frequency? Persons involved? Allowances, transport/fares, stationery, etc.)  | 20 visits 10 delegates         | 30,000        |
| 6     | Management meetings (frequency? How many persons? Allowances? etc.)   | quarterly 15                   | 25,000        |
| 7     | Documentation/Reporting (lump sum annual)   | 5                              | 5,000         |

|   |   |                  |         |
|---|---|------------------|---------|
| 8 | Coordination and facilitation (lump sum-annual) | 5                | 70,000  |
|   | Contingency Cost                                | 10% of Total sum | 20,000  |
|   | Grant Total                                     |                  | 230,000 |

**5.2 GRM Work plan**

The status of the development of the GRM 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, use of the mechanism, and recommend improvements as necessary.

**Table 3-2: GRM Implementation Plan**

|    | Activities   | Time frame |   |   |   |   |   |   |   |   |   |   |   | Responsibility / Accountability |   |
|----|--|------------|---|---|---|---|---|---|---|---|---|---|---|---------------------------------|---|
|    |  | Months     |   |   |   |   |   |   |   |   |   |   |   |                                 |   |
|    |  | J          | F | M | A | M | J | J | A | S | O | N | D |                                 |   |
| 1. | Ensuring that all GRM channels are ready and up to date to be used before the project’s operations started.  |            |   |   |   |   |   |   |   |   |   |   |   |                                 | GRM Specialist / Social Safeguards Specialist / PIU |
| 2. | Appointing GRM committee by the coordinator  |            |   |   |   |   |   |   |   |   |   |   |   |                                 | GRM Specialist / Social Safeguards Specialist / PIU |
| 3. | The safeguards specialists at respective MoEM (FGS) will man the GRM platform for Project level to ensure that all grievances are handled with integrity and are timely and effectively resolved |            |   |   |   |   |   |   |   |   |   |   |   |                                 | GRM Specialist / Social Safeguards Specialist / PIU |
| 4. | Assign a focal person (s) from OE, Contractors and local GRC for grievance uptake and reporting  |            |   |   |   |   |   |   |   |   |   |   |   |                                 | GRM Specialist / Social Safeguards Specialist / PIU |





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| 14. |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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### **3. MONITORING AND EVALUATION**

Monitoring and evaluation are critical to the success of any GRM. 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

#### 4. ANNEXES

##### 5.3 Annex I: Complaint Register for Individual

| COMPLAINT/GRIEVANCE REGISTER   |   |
|--|---|
| Unique Reference No. Pre-Printed   | Date:   |
| Name of Complainant or Representative of group of complainants   |   |
| Contact Details of complainant or representative of group of complainants (if available), Anonymous complaints are also allowed. | Residence:  |
|  | Telephone:  |
| Location where complaint is received:  | Location the grievance is related to:                 |
| State  | State   |
| Region   | Region  |
| District   | District  |
| Grievance is related to (nature of complaint):   |   |
|  |   |
|  |   |
|  | Other   |
| Description of Complaint:  |   |
| Grievance  | Non-grievance (grievances not related to the project) |
| Name of Complainant:   | Signature/Thumb print of Complainant                  |
| Name of witness (If available)   | Signature/Thumb print of witness (If available)       |
| Name of recipient  | Signature of recipient                                |
| Mode of receipt  | Phone:  |
|  | Letter:   |
|  | Verbal:   |

#### 5.4 Annex II: Investigation Outcome / Resolution

| <b>INVESTIGATION OUTCOME/RESOLUTION</b>   |   |
|---|---|
| <b>Reference no of registered complaint:</b>  | <b>Date:</b>  |
| <b>Name of complainant or representative of group of complainants:</b>  |   |
| <b>Contact details of complainant or representative of group of complainants (if available):</b>                          | Residence:  |
|   | Telephone:  |
| <b>Location where complaint is received:</b>  | <b>Location where complaint is related to:</b>  |
| County:   | County:   |
| Sub-County:   | Sub-County:   |
| Division:   | Division:   |
| Location:   | Location:   |
| Sub-location:   | Sub-location:   |
| Village:  | Village:  |
| <b>Project</b>  |   |
|   |   |
|   | Other   |
| <b>Complaint is related to:</b>   |   |
|   |   |
| <b>Response to complainant (investigation outcome and resolution proposed)</b>  |   |
| <b>Acknowledgement of resolution by complainant</b>   |   |
| <i>I hereby acknowledge that the resolution provided by.....is acceptable to me and/or to the group that I represent.</i> |   |
| <b>Name / Thumb print of complainant or representative of group of complainants:</b>                                      | <b>Signature / Thumb print of complainant or representative of group of complainants:</b> |
| <b>Name/thumb print of witness (if available)</b>   | <b>Signature/thumb print of witness (if available)</b>                                    |
| <b>Name of personnel</b>  | <b>Signature of personnel</b>   |

## 5.5 Annex III: Incident Classification Guide

As per World Bank Standards<sup>1</sup>, the concerns and grievances that arise in connection with a project makes the following distinctions:

- **Project-related complaints and grievances:** These focus on Project-related complaints and grievances. The different steps of handling such are defined.
- **GBV/SEA/SH related complaints and grievances:** Complaints and grievances relating to Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH), given their sensitivities and considerations related to a survivor-based approach, are reported to the available GRM grievance recipients, but the grievances follow a different process. This counts for complaints and grievances from PAPs, as well as workers deployed by the project.
- **Labour-related complaints and grievances:** Complaints from project workers raising from workplace concerns, terms of employment and other related concerns are registered through a separate (Workers’) GRM.
- **Second tier / escalated complaints and grievances:** This concerns complaints and grievances that cannot be solved by the first tiers (Project-wide and workers’ complaints and grievances) or have been escalated by users dissatisfied with the resolutions from the first tiers. This GRM describes procedures how these grievances shall be addressed through an appeals mechanism.

### Categorization of Grievances:

The grievances will be categorized using the guidance summarized below:

| Categories of Grievances                          | Details   |
|---|---|
| <b>1. Basic Information</b>                       | <ul style="list-style-type: none"> <li>• Access to information</li> <li>• Correction and deletion of untrue or misleading information that affects the person</li> </ul>  |
| <b>2. Ethics and Conduct</b>                      | <ul style="list-style-type: none"> <li>• Government entities and staff</li> <li>• Implementing Partner staff</li> </ul>   |
| <b>3. Violation and Breach of Codes of Ethics</b> | <ul style="list-style-type: none"> <li>• Violation of codes of ethics</li> <li>• Breach of the code of ethics by government officers</li> <li>• Breach of Code of Conduct and Ethics by staff of Implementing Partners</li> </ul> |

<sup>1</sup> <https://mof.gov.so/sites/default/files/Publications/270121%20SCRP%20GRM%20Manual%20approved%20from%20WB.pdf>

|  |  |
|--|--|
| <b>4. Violation of Human Rights and Fundamental Freedoms</b>   | <ul style="list-style-type: none"> <li>• Gender equality and general equality matters. <ul style="list-style-type: none"> <li>❖ Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities in political, economic, cultural and social)</li> <li>❖ Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment)</li> <li>❖ Non-discrimination of special needs groups.</li> </ul> </li> </ul> |
| <b>5. Corruption and Economic Crimes</b>   | <ul style="list-style-type: none"> <li>• Unethical conduct</li> </ul>  |
| <b>6. Labor &amp; Working Conditions</b>   | <ul style="list-style-type: none"> <li>• Termination/Summary Dismissal</li> <li>• Breach of Employment Contract Terms</li> <li>• Conflicts with Trade Unions</li> <li>• Work Injury</li> <li>• Discrimination</li> <li>• Sexual Harassment 9</li> <li>• Remuneration</li> <li>• Wrongful termination</li> <li>• Suspension</li> <li>• Waiver of Claims</li> </ul>  |
| <b>7. Environmental Compliance Violations</b>  | <ul style="list-style-type: none"> <li>• Violation of environmental standards laid out in the ESIA's, ESMPs, and ESMF.</li> </ul>  |
| <b>8. Occupational Health and Safety (OHS)</b>   | <ul style="list-style-type: none"> <li>• Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs</li> </ul>   |
| <b>9. Gender-Based Violence (GBV) / Sexual Exploitation &amp; Abuse (SEA) / Sexual Harassment (SH)</b> | <ul style="list-style-type: none"> <li>• Gender based violence committed by project personnel or any worker on the Project, or GBV committed in relation to the Project.</li> <li>• Sexual Exploitation and Abuse committed by Project staff or any worker of an IP associated to the Project.</li> <li>• Sexual Harassment committed by Project staff or any worker of an IP associated to the Project.</li> </ul>  |

**Incident Classification Guide:**

The following criteria (as also represented by the colour codes) shall be used when classifying the incidents during the project cycle:

| <b>Incident class</b> | <b>Details</b> | <b>Notification time</b> | <b>Resolution period</b> |
|-----------------------|----------------|--------------------------|--------------------------|
|-----------------------|----------------|--------------------------|--------------------------|

|                                     |  |  |  |
|-------------------------------------|--|--|--|
| <p><b>Indicative</b></p>            | <ul style="list-style-type: none"> <li>• Relatively minor and small-scale localized incident that negatively impacts a small geographical area or small number of people.</li> <li>• Does not result in significant or irreparable harm</li> <li>• Failure to implement agreed E&amp;S measures with limited immediate impacts</li> </ul>  | <ul style="list-style-type: none"> <li>• No notification, required as cases are resolved with project</li> </ul> | <ul style="list-style-type: none"> <li>• Within 1 week for cases not requiring financial resources</li> <li>• Cases needing finances shall be discussed by management</li> </ul> |
| <p><b>Serious</b></p>               | <ul style="list-style-type: none"> <li>• An incident that caused or may potentially cause significant harm to environment, workers, communities, or natural or cultural resources</li> <li>• Failure to implement E&amp;S measures with significant impacts or repeated non-compliance with E&amp;S policies incidents</li> <li>• Failure to remedy indicative non-compliance that may potentially cause significant impacts</li> <li>• Is complex and/or costly to reverse</li> <li>• May result in some level of lasting damage or injury</li> <li>• Requires an urgent response</li> <li>• Could pose a significant reputational risk for donor (World Bank)</li> </ul> | <ul style="list-style-type: none"> <li>• Within 72 hours</li> </ul>  | <ul style="list-style-type: none"> <li>• Depend on the nature of the grievance and the investigation approach required</li> <li>• Shall not exceed 30 working days</li> </ul>    |
| <p><b>Catastrophic / severe</b></p> | <ul style="list-style-type: none"> <li>• Any fatality</li> <li>• Incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources</li> </ul>   | <ul style="list-style-type: none"> <li>• Within 24 hours of occurrence</li> </ul>                                | <ul style="list-style-type: none"> <li>• Depend on the nature of the grievance and the investigation approach required</li> </ul>  |

|  |   |  |  |
|--|---|--|--|
|  | <ul style="list-style-type: none"> <li>• Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed.</li> <li>• Failure to remedy serious non-compliance that may potentially cause severe impacts which is complex and/or costly to reverse</li> <li>• May result in high levels of lasting damage or injury</li> <li>• Requires an urgent and immediate response</li> <li>• Poses significant reputational risk to the donor (World Bank)</li> </ul> |  | <ul style="list-style-type: none"> <li>• Shall not exceed 60 working days</li> </ul> |
|--|---|--|--|



## 5.6 Annex IV: Guidelines for Empathetic, Survivor Centric Recording of Complaints

A survivor centered approach aims to create a supportive environment in which a survivor's rights are respected and in which s/he is treated with dignity and respect. The approach helps to promote a survivor's recovery and his/her ability to identify and express needs and wishes, as well as to reinforce his/her capacity to make decisions about possible interventions<sup>2</sup>. Key of the survivor-centered approach is that no steps can be taken without the survivor's informed consent.

The principal guideline is for an empathetic, non-judgmental listening to a survivor when recording a complaint. The following additional guidelines should be used:

| <b>Call Answering Protocol for GBV/SEA/SH Cases</b>  |   |
|--|---|
| 1.   | Answer call according to standard script  |
| 2.   | Ensure confidentiality  |
| 3.   | Collect intake information  |
| 4.   | Provide emotional and psychological support   |
| 5.   | Detect if there is immediate danger for the survivor                                |
| 6.   | Explain informed consent, obtain if survivor agrees                                 |
| 7.   | Provide contacts for referral services and assistance to access them where required |
| <b>Guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint</b>  |   |
| <ul style="list-style-type: none"><li>❖ Listen, inquire, validate enhance safety and support</li><li>❖ Be patient and give compassionate responses to the caller, particularly because the caller is likely to be upset and in distress</li><li>❖ Responses should be dealt with in a calm way</li><li>❖ Do not make judgements or ask inappropriate questions</li><li>❖ Be sensitive to cues survivors may give</li></ul> |   |

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<sup>2</sup> Global Protection Cluster, Guidelines for Integrating Gender Based Violence Interventions in Humanitarian Action

### 5.7 Annex V: Informed Consent Process:

The informed consent process will apply to the Hotline Operator. The following shall apply:

| <b>Informed Consent Process/Questions for Hotline Operator</b> |  |
|--|--|
| <b>1.</b>  | Tell a survivor what is going to happen to him/her.  |
| <b>2.</b>  | Explain to him/her the benefits and risks of an intervention (investigation).  |
| <b>3.</b>  | Explain that s/he has the right to decline or refuse any part of an intervention.  |
| <b>4.</b>  | Explain that pressure will not be exerted in any form.   |
| <b>5.</b>  | Explain that if the survivor does not want to be interviewed about the event or does not agree to any further investigations, this will NOT affect access to health and other services and does not preclude participation in future proceedings related to legal justice. |
| <b>6.</b>  | Inform the survivor that there is no mandatory reporting in the setting.   |
| <b>7.</b>  | Inform the survivor that information about him/her will be discussed in the team.  |
| <b>8.</b>  | Inform that the identified data will be used for program information purposes.   |
| <b>9.</b>  | Emphasize the security of client information.  |
| <b>10.</b>   | Ensure that the survivor understands what you have told him/her.   |

## 5.8 Annex VI: GBV/SEA/SH Case Registration Form

|  |   |
|--|---|
| <b>Administrative Information</b>                    | <ol style="list-style-type: none"> <li>1. Grievance ID</li> <li>2. Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)</li> <li>3. Date of grievance registration</li> <li>4. Date of Incident</li> <li>5. Reported by survivor or an escort of the survivor, in the presence of the survivor</li> <li>6. Reported by someone other than the survivor without survivor present</li> </ol>  |
| <b>Survivor Information</b>                          | <ol style="list-style-type: none"> <li>1. Gender / age</li> <li>2. Location / Residence</li> <li>3. Current civil/marital status</li> <li>4. Occupation</li> <li>5. Is the survivor a person with mental or physical disabilities?</li> <li>6. Is the survivor an unaccompanied or separated child?</li> <li>7. Was the perpetrator related to the project?</li> <li>8. Has Informed consent been provided? yes/no?</li> <li>9. Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?</li> </ol>   |
| <b>Sub-Section for Child Survivor</b>                | <ol style="list-style-type: none"> <li>1. If the survivor is a child (less than 18 years), does he or she live alone?</li> <li>2. If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)</li> <li>3. What is the caretaker's current marital status?</li> </ol>  |
| <b>Details of the Incident (in survivor's words)</b> | <ol style="list-style-type: none"> <li>1. Details of the incident</li> <li>2. Incident location and time</li> <li>3. Were money, goods, benefits and/or services exchanged in relation to the incident?</li> </ol>  |
| <b>Alleged Perpetrator Information</b>               | <ol style="list-style-type: none"> <li>1. Number of alleged perpetrators</li> <li>2. Sex of alleged perpetrators</li> <li>3. Age group of alleged perpetrator(s)</li> <li>4. Indicate relationship between perpetrator(s) and survivor</li> <li>5. Main occupation of the alleged perpetrator(s)</li> <li>6. Employer of the alleged perpetrator(s)</li> </ol>  |
| <b>Planned Actions / Actions Taken</b>               | <ol style="list-style-type: none"> <li>1. Was the survivor referred by anyone?</li> <li>2. Was the survivor referred to a safe house / shelter?</li> <li>3. Which services does the survivor wish to be referred to? <ul style="list-style-type: none"> <li>❖ Psychosocial services</li> <li>❖ Legal services</li> <li>❖ Police</li> <li>❖ Health services</li> <li>❖ Livelihood program</li> </ul> </li> <li>4. What actions were taken to ensure the survivor's safety?</li> <li>5. Describe the emotional state of the client at the beginning of the report</li> <li>6. Other relevant information</li> </ol> |

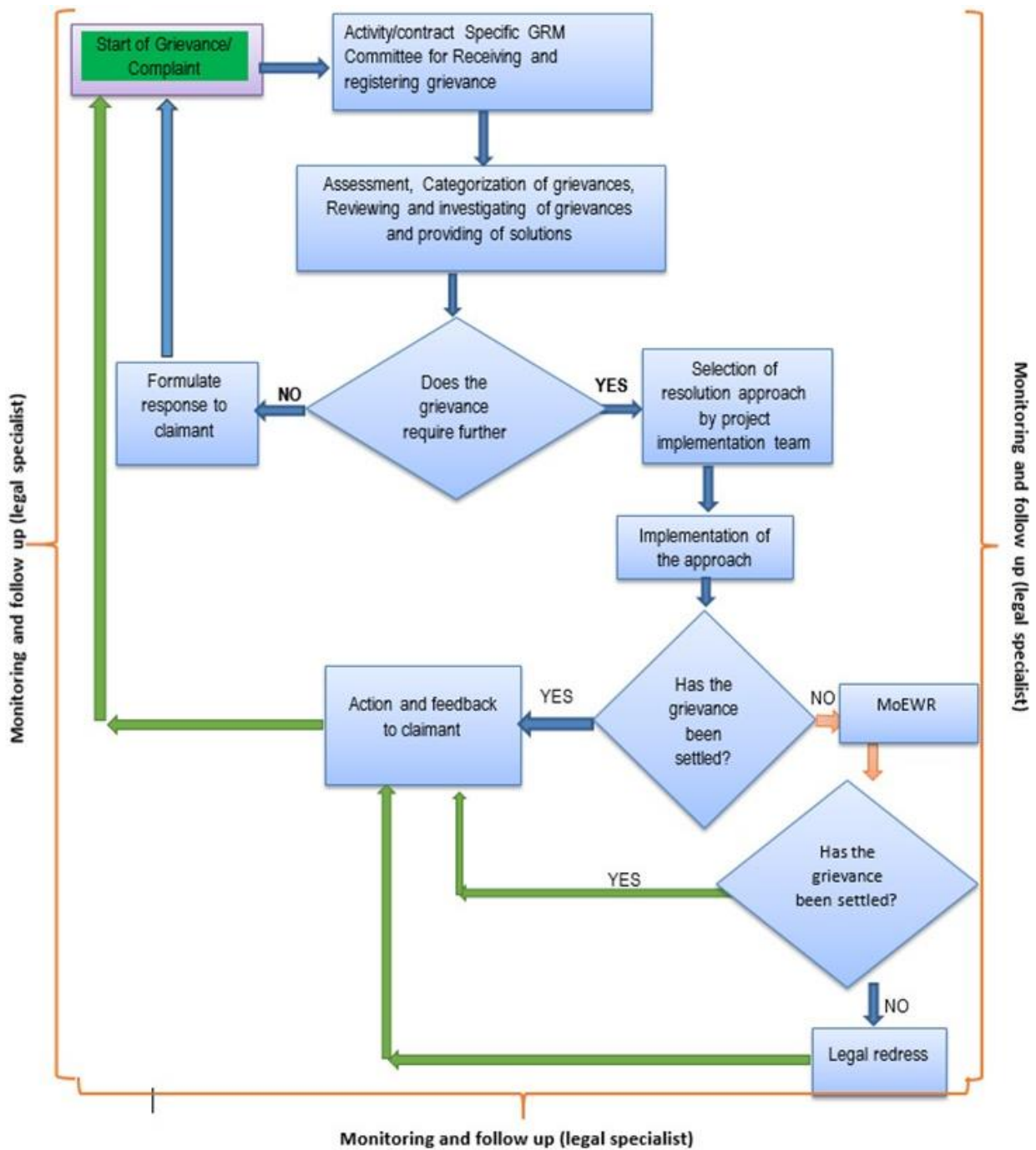
## 5.9 Annex VII: GBV/SEA/SA Referral Services

### IMPORTANT NOTE:

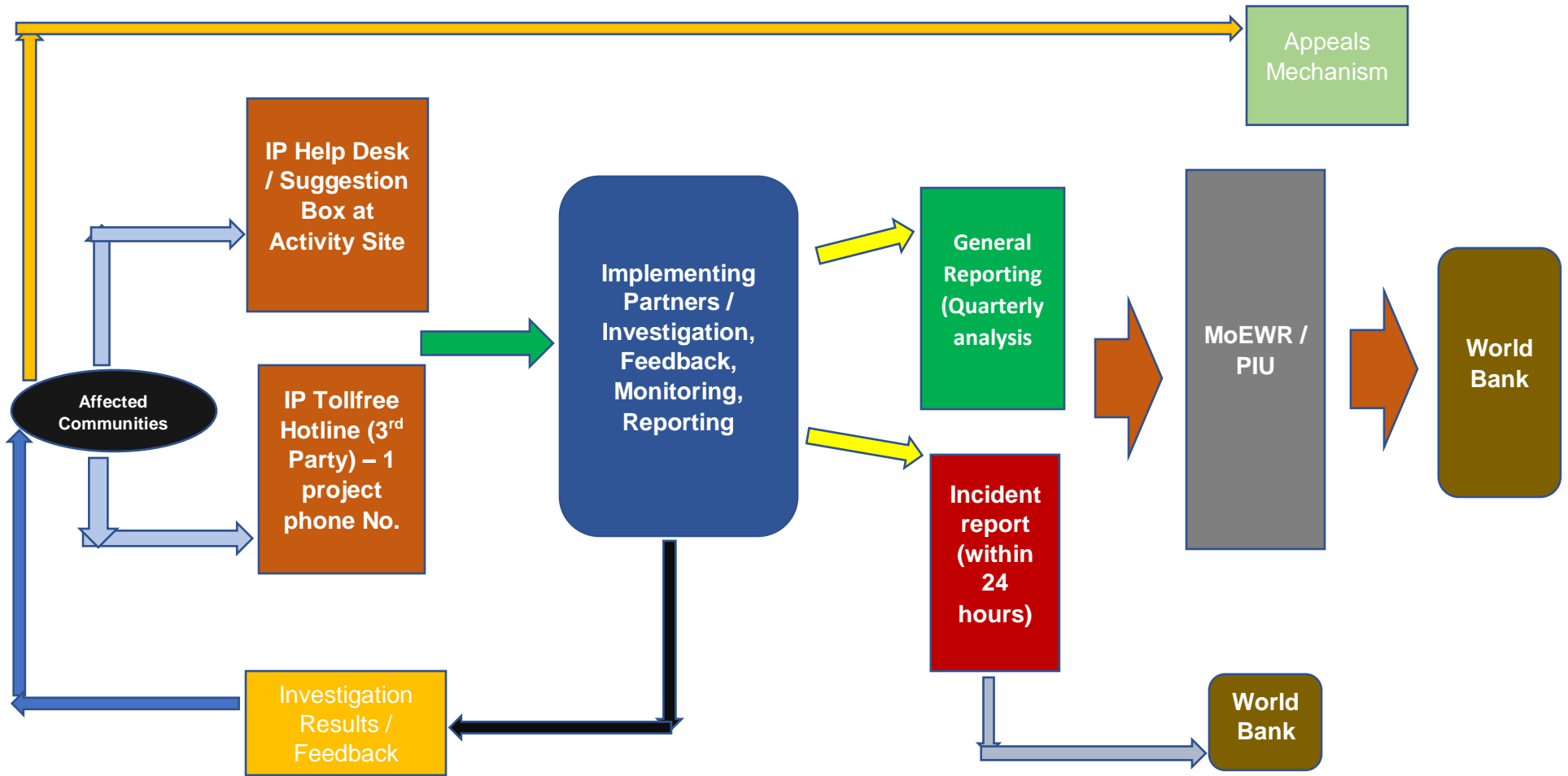
- ❖ Needed here is a **list of the actors working on GBV service provision and referral pathways** in SESRP project areas.
- ❖ The names of service providers, the type and quality of key services they provide will vary significantly from one location to another.
- ❖ This list will, therefore, only be possible to develop upon physical verification during fieldwork by the Consultant to the project areas.
- ❖ Alternatively, the PIU can give a suggestive list to be adopted at this point, but latter modified as necessary during implementation in consultation with actors in the GBV sub-cluster.

## 5.10 Annex VIII: Grievance Redress Mechanism Process

General flow:



**SESRP Grievance Redress Mechanisms Flowchart:**



## 5.11 Annex IX: TOR for the Grievance 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.



## **5.12 Annex X: TOR for Grievance Redress Specialist**

The GRM Specialist operates at the Project level. The GRM Specialist acts as a liaison between the GRC at the Tier 1 and 3 levels. The GRM specialists guides the Tier 1 GRCs on how to conduct GRM processes and procedure and acts as the supervisor for the Tier GRM processes. At the Tier 3 level, the GRM Specialist informs on the dispute submitted before them and why it was not solved at both Tier 1 and Tier 2 levels. The GRM Specialist becomes acts as an expert when a grievance is submitted to Tier 2 and 3 GRCs.

Some the tasks expected from the Grievance Redress Specialist are listed below.

- Respond to written/verbal grievances, complaints, appeals and disputes submitted by the community through the GRC committees
- Ensure cases are accurately classified and categorized.
- Determines if additional information or documentation is needed to make appropriate decisions.
- Process appeals and grievances to facilitate the accurate administration of benefits; ensure compliance of the appeal and grievance process with all regulatory requirements.
- Prepare comprehensive case histories for presentation and consideration at committee meetings and audits.
- Work as an effective interface between different levels of GRCs
- Prepare appeal cases to send to a higher GRCs and even to the Somali legal system should the grievance not be solved.
- Present appeal case information to a multi-department committee.

### **5.13 Annex XI: TOR for GRM Hotline Operator**

The GRM Hotline Operators are people designated to receive complains from community members or any other stakeholders as the initial point of the GRM. The operators may receive such complaints through telephone calls, telephone messages and any other messaging forum.

The Hotline Operators have to be familiar with the SESRP Project as a whole; with all partners implementing the SESRP (including their key contact persons and contact details); the content of the different GRM; and the GBV/SEA/SH referral pathways and required responses for such cases.

Furthermore, the Hotline Operators should understand that grievances relating to different risk levels may be treated differently; that GBV/SEA/SH cases have special procedures for redress and require a high level of sensitivity and confidentiality. Furthermore, Hotline Operators should be familiar with the incident reporting system laid out in the ESMF. A dedicated training will be provided initially to the Hotline Operators by the PIU.

The hotline operator is tasked with report any received grievances to the relevant GRC and communicating the decisions of the GRCs to the aggrieved party.

Some the tasks expected from the GRM Hotline Operator are listed below.

- Respond to helpline calls from potential callers with grievances.
- Conduct follow-up on helpline calls using protocols and referral databases.
- Communicate and follow up with relevant GRCs
- Keeping information about callers with confidentiality
- Assist in developing training and tools for helpline.
- Assist in updating, maintaining and expanding helpline network, resources and databases.
- Provide general relevant administrative support.
- Participate in regular meetings such as staff meetings, debriefings and trainings in GRM matters.
- Responsible for handling incoming phone calls by person of concern through dedicated helpline.
- Record calls and caller's information by completing provided forms.
- Register complaints from person of concern and follow up with concerned departments.
- Provide the information for person of concern regarding GRM services

**5.14 ANNEX XII: Grievance / Complain Log / Register**

| <b>Date</b> | <b>Reference Number of the Complaint</b> | <b>Name of Complaint and Sign</b> | <b>Description of the Grievance / Complaint</b> | <b>Officer Receiving Complaint</b> | <b>Nature of Complaint/ Service Issue, e.g. Delay</b> | <b>Remedy Granted</b> | <b>Corrective/ Preventive Action to be Taken</b> | <b>Date of the Corrective Action Taken</b> | <b>Feedback Given to Complainant</b> | <b>Status of the Complaint (Ongoing, Closed)</b> |
|-------------|--|-----------------------------------|---|------------------------------------|---|-----------------------|--|--|--------------------------------------|--|
|             |  |                                   |   |                                    |   |                       |  |  |                                      |  |
|             |  |                                   |   |                                    |   |                       |  |  |                                      |  |
|             |  |                                   |   |                                    |   |                       |  |  |                                      |  |
|             |  |                                   |   |                                    |   |                       |  |  |                                      |  |