

Draft overview of the Abaar-Tir Project Grievance Mechanism, July-2024

COMPLAINTS CHANNELS

GW4R GRM & GBV EMAILS

EMAILS	LOCATION	REMARKS
FGS Main Email		
gw4r.grm@gmail.com	FGS level	Main grievance email for GW4R Project
GBV/SEAH Main Email		
gw4r.gbv@gmail.com	FGS level	Main email for GBV/SEAH Complaints
JUBALAND		
js.gw4r.grm@gmail.com	Jubaland State of Somalia	State Level
jl.gw4r.gbv7@gmail.com	Jubaland State of Somalia	State Level
SOUTHWEST STATE		
sw.gw4r.grm@gmail.com	Southwest State of Somalia	State Level
sw.gw4r.gbvs@gmail.com	Southwest State of Somalia	State Level
HIRSHABELLE		
hs.gw4r.grm@gmail.com	Hirshabelle State of Somalia	State Level
hs.gw4r.gbv1@gmail.com	Hirshabelle State of Somalia	State Level
Galmudug State		
gm.gw4r.grm@gmail.com	Galmudug State of Somalia	State Level
gm.gw4r.gbv@gmail.com	Galmudug State of Somalia	State Level
Puntland State		
pl.gw4r.grm@gmail.com	Puntland State	State level
pl.gw4r.gbv@gmail.com	Puntland State	State level
HOTLINE NUMBER (FREE)		9992
		The free hotline number functions within 24 hours in all Project Locations.

Awareness raising

Awareness raising on how and where to raise grievances will be carried out at the community, FMS, and FGS level in order to reach all stakeholders as outlined in the stakeholder engagement plan using posters, leaflets, providing this overview on the website, and other means as appropriate. Grievance awareness is conducted through community engagement sessions, field visits, posters displayed at water points and district offices, and publication of GM contacts at FMS and FGS levels, ensuring information is shared in accessible language and formats. Hard-to-reach groups, including traditional minorities and seasonal users, are reached through targeted consultations aligned with seasonal movements, engagement of trusted local leaders, and trained site-level GM/GBV focal points who remain accessible within the community to receive and manage complaints confidentially. The GM should be accessible to all groups including those who have limited access to technology, are illiterate or vulnerable, or marginalized.

Overview

1. *An accessible and functional grievance mechanism is important in addressing community or stakeholder concerns as well as receiving feedback on a project so that it can be improved.* It is a requirement for all World Bank projects and the responsibility of all project staff, any of whom may receive the grievance.

2. It is *preferable that grievances are resolved in person at the lowest level*, however, different levels and channels of registering grievances should be available so that *even the most marginalized person feels comfortable raising a grievance*. *GBV/SEAH-related complaints should be referred immediately to the GBV focal points at FMS or FGS level*.
3. Grievances should be dealt with *confidentially, on a need-to-know basis only, and without fear of backlash*. The designated GM/GBV focal points made every effort to ensure confidentiality and protect complainants from any form of retaliation. All grievances are managed under strict confidentiality protocols, with complaints recorded without public disclosure of personal identifiers and accessible only to designated GM personnel on a need-to-know basis. Sensitive cases, particularly those related to GBV/SEA/SH, are handled through a separate confidential channel with a trained GBV specialist.
- 4.
5. Grievances can be raised by *community members, workers, and other stakeholders* concerning project implementation including adverse social or environmental impacts, misuse of funds; staff behavior, workers' conditions or safety, quality of service issues, sexual exploitation and abuse, forced or child labor etc.
6. Confidentiality and timelines: Grievances can be submitted anonymously by any complainant, and personal data should be anonymized for all complainants. Grievances will be *acknowledged within a week (7 days) of receipt and resolved if possible, within 21 days including feedback to the complainant*. The complaint will be addressed as fully and precisely as possible focusing on specific facts and events, *showing understanding and never dismissing or belittling a complaint*.
7. Cases of GBV/SEAH: Such cases will be only handled by GBV focal points trained in survivor-centric complaints handling and treated with *utmost confidence, respect, and empathy and managed in line with the complainants' express wishes*, including whether the complaint is registered and referred. All complaints will be anonymised, indicating a reference number rather than the name of the complainant.
8. Project fully assumes a survivor-centered approach, no information can be passed on without the survivor's consent.
 - Information regarding channels for receiving incidents of GBV/SEAH should be displayed in the project office and infrastructure sites at all times.
 - The GBV focal person is responsible to make a list of functioning GBV services and distribute it to all staff of the project, VDC GBV focal points and contractors' GM focal points, so they are aware of where to refer complaints.
 - 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 involved with the project, the nature of the incident, the age and sex of the complainant and if the survivor/complainant was referred to services below*.
 - The complainant should be informed about available confidential health, psychological, legal, and safe house or other support, including the importance of receiving PEP and PREP within 72 hours and if possible provided transport support to reach them. *The complainant's wishes to report and access services should be respected at all times*.
 - AN ALLEGATION OF GBV SHOULD NEVER BE INVESTIGATED AS IT MAY DO MORE HARM TO THE SURVIVOR AND REQUIRES SPECIALIST HANDLING. If the complaint is against a worker involved in the project, *the incident should be immediately reported to the GBV specialist who will provide further guidance after consulting with the World Bank*.

MOEWR will have the responsibility of overseeing the resolution of all grievances related to the project activities in accordance with the laws of FGS, FMS, and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all general grievances will be with the social specialists at the FGS and FMS levels who will receive grievances by phone, text or email to publicized free toll-free mobile phone lines and email addresses at both FMS and FGS levels. Based on the learning from NGOs, the free toll-free lines are not often used to report serious cases for fear of retribution or the assumption that there will be no up follow-up. Limited awareness is also another issue, thus

widespread awareness raising on the GM to promote an understanding and trust in the system. The social specialists will acknowledge, log, forward, follow up on grievance resolution, and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistle-blower protection for complaints raised in good faith will be ensured. The FGS social specialist will carry out training of all Government staff involved with the project, and contractors on receiving complaints, referral referrals, complaints handling, and reporting, and will oversee awareness raising on the GM at the national level.

A grievance redress committee (GRC) will be established at FMS and FGS levels 6 months after project effectiveness chaired by the Project Managers. The relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation, GBV advisor and communication). The social specialists will compile minutes for the meetings and follow up on the grievance resolution process. The GRC will meet monthly to review minor complaints, progress on complaints resolution, review the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the MOEWR NPCU and FMS SPIU. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment, or those which may pose a risk to the project reputation, the FMS social specialist should immediately inform the FGS social specialist or head of the NPCU, who will inform the World Bank within 24 hours as per the Environmental and Social Commitment Plan.

All contractors and suppliers will be expected to have a separate workers GM the functionality of which should be monitored. They should also sensitize their workers about the Project GM and have a focal person to receive complaints regarding the construction and their workers and put in place complaints structures specific to the workers (as detailed in the LMP).

At the community level, local committees with strong representation of disadvantaged groups will receive complaints directly from the community, contractors, etc., and forward to the FMS social specialist or support resolution and follow up.

The social specialist is responsible for noting and reporting critical trends emerging in the GM process such as an a lack of grievances from certain areas or groups and increase/decrease in types of grievances to share with the GRC, as well as tracking complaints expressed on social media and whether and how these should be addressed. Throughout the process, the safeguards specialists will receive support from the PIU. The social specialist will use the GEMS form to register every complaint. Grievances are recorded and formally registered at the FGS level by the Social Specialist to ensure trust, confidentiality, and consistent reporting . The FMS Social and GBV Specialists liaise on all state- and site-level complaints, coordinating their submission to the FGS for logging and oversight. In addition, the FMS specialists lead GM awareness activities at state and community level, educating stakeholders on available reporting channels and processes, with support from site-level VDC members who serve as liaison and outreach focal points.

email to the FMS PM and FGS social specialist.

In summary:

1. **Grievance focal points in the VDC:** Grievances are logged at the FGS level to ensure centralized tracking and consistency in reporting. At community level, the VDC serves only as a liaison point, coordinating with community members and channeling site-level concerns and complaints to the respective PIU. The PIU reviews and formally submits the grievances to the FGS Social Specialist, who is responsible for logging the complaint in the official Grievance form);
2. **Contractor:** deal with minor info complaints or issues that can be resolved locally and communicate all complaints to the FMS safeguards specialist, initially via the toll-free line (who will log using the Grievance form in Kobo), although contractors could be oriented to do that directly in future if easier;

3. **FMS E&S focal points for implementing agencies:** deal with complaints due to lack of information or minor issues that can be resolved locally and communicate all complaints to the FMS Social safeguards specialist, initially via the toll free line (who will log on the Grievance form in ODK/kobo), although contractors could be oriented to do that directly in future if easier;
4. **FMS social/GBV specialist** refers all complaints to the FMS GRC, is secretary of the GRC, and follows up, GBV specialist provides information on GBV services if they have and should immediately liaise with FGS GBV focal point;
5. **FGS social/GBV specialist:** refers all unresolved or serious complaints to the FGS GRC, is secretary of the GRC and follows up resolution and feedback to the complainant. The GBV specialist should liaise with the WB GBV specialist on how to handle GBV/SEAH complaints.
6. **Project Coordinator:** Received serious incidents directly and forwards to the WB TTL within 48 hours. Chairs the FGS GRC and oversees the functioning of the GM.

Toll-free lines, the social specialist will be responsible for operating the toll-free lines, registering the complaints in Kobo and in the Excel logbook, forwarding the cases to the proper entities/persons, and following up on the resolution and feedback to the complainant (within 21 days). In the absence of the Specialist or when on leave, the GBV specialist will be responsible for receiving the calls and filling the gap for the social specialist. Before activating the hotline, the social specialist, the GBV focal point, and other PIU staff will be trained on GM, registering the complaints, handing the GBV cases coming in through the hotline, GBV service referrals, and caller management skills.

While the ESCP indicates a 24 hours, hotline, the number remains active and publicly accessible; however, it is not currently feasible to operate a fully staffed 24-hour call service. Instead, the Social and GBV Specialists directly manage incoming calls during the normal hours and extend availability into the evening where feasible. Calls received late at night may not be answered immediately; however, missed calls are logged and returned at the earliest opportunity during the next working period. This approach ensures continued accessibility within operational capacity, while maintaining confidentiality and timely follow-up.

REGISTERING A COMPLAINT:

Level	How to raise	Resolution	Type of complaints that can deal with	Awareness raising?
Village level: GRM focal person in Village Development Committee	Phone or in person	Resolve (in conjunction with VDC) or refer to FMS safeguards officer	Minor complaints that can be easily resolved, especially information or adjustments by contractor	Verbally at community meetings Poster (with toll free number) on community centre or central point
Contractor: site supervisor or designate	Phone or in person	Resolve or refer to FMS Social safeguards officer	Minor issues, adjustments in line with ESMP, dust, traffic etc.	Site handover and community meetings Overview in office and poster at site
FMS implementing agencies/contractors: E&S focal point	Phone or in person			

FMS level: social specialist (in conjunction with PM and GRC), GBV focal point for complaints related to GBV	Phone or email or toll-free hotline number in Puntland	Resolve (with PM/GRC) or refer to FGS	All complaints should be logged into GEMS and the information downloaded every month to produce a register which is sent to the FGS social specialist and FMS PM	Overview in FMS offices and poster in public place and on FMS website including of implementing agencies.
FGS level: social specialist (in conjunction with PM and GRC), GBV focal point for complaints related to GBV	Phone or email	Resolve (with PM and GRC) and inform WB (immediately or in quarterly report)		Overview in FGS offices and poster in public place and on FGS website.

Grievance Redress Committee (GRC)

A Grievance Redress Committee (GRC) will be established at FMS and FGS level and chaired by the project manager, and the relevant PIU staff will be included as necessary depending on the complaint (procurement, finance, M&E, GBV advisor and communications). The Social specialist will minute the meetings and follow up on the grievance resolution process including feeding back to the complainant. The GRC will meet once every month to review summaries of the number and type of complaints and ensure that they have been satisfactorily followed up and to address any problems in the projects that may be causing complaints, review the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Emergency meetings will be called at FMS or FGS level in case of significant complaints or incidences. For serious or severe complaints or incidences involving harm to people or the environment or those which may pose a risk to the project reputation, the FMS social specialist should immediately inform the FGS social specialist or head of the PIU, who will inform the World Bank within 24 hours as per the Environmental and Social Commitment Plan.

Publicly advertised procedures, are posted on website project/Ministry website

Suggestions, concerns and feedback are welcomed by the GW4R project to improve its performance. These can be communicated to project staff or via (9992) or sent to: (gw4r.grm@gmail.com). In the case of complaints relating to GBV these should be communicated anonymously with the informed consent of the complainant to the GBV expert training in survivor centred approaches on (9992) or (gw4r.gbv@gmail.com). All grievances should be treated confidentially, impartially and without retribution and can be submitted anonymously. Grievances will be acknowledged within 7 days of receipt and resolved within 21 days including feedback to the complainant. Complaints can also be raised via talk to loop mail info@talktoloop.org.

World Bank Somalia: If a grievance has been raised with the NPIU, and no satisfactory response has been received, an email can be sent to somaliaalert@worldbank.org

World Bank Grievance Redress Service: If no response has been received from the World Bank Somalia office the grievance can be raised with the World Bank Grievance Redress Service email: grievances@worldbank.org. For more information: <http://www.worldbank.org/grs>.

Serious incidents

A serious incident is one that caused or may cause significant harm to the environment, workers, communities, or natural or cultural resources, is complex or costly to reverse and may result in some level of lasting damage or injury; or failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies; or failure to remedy Indicative non-compliance that may potentially cause significant impacts.

Examples of serious incidents may include injuries to workers that require off-site medical attention, exploitation or abuse of vulnerable groups, consistent lack of Occupational Health and Safety (OHS) plans in a civil works project, and large-scale deforestation. Serious incidents require an urgent response and could pose a significant reputational risk for the Bank.

A severe incident is one that caused or may cause great harm to individuals or the environment, or present significant reputational risks that could hamper the Bank's ability to operate in a country or region. The Borrower's inability or unwillingness to remedy situations that could result in serious or severe harm would be a factor in classification. A severe incident is complex and expensive to remedy (if possible), and is likely irreversible. A fatality is automatically classified as severe, as are incidents of major environmental contamination, forced or child labour, abuses of community members by project security forces or other project workers (including GBV) violent community protests a project, kidnapping, and trafficking in endangered species.

WORKERS GM

Typical workplace grievances include fair and equal opportunity for employment; labour wage rates and delays of payment; disagreement over working conditions; and health and safety concerns in the work environment. Therefore, a GM will be provided for all Project workers including **direct workers, contracted workers** to raise workplace concerns. Such workers will be informed of the GM at the time of recruitment and the measures put in place to protect them against any reprisal for its use. Handling of grievances should be objective, prompt, confidential and responsive to the needs and concerns of the aggrieved workers, enabling them to prevent, mitigate, or resolve tensions and problems before they escalate into more serious issues that will require extra resources to address.

Procedures for Workers grievances

- The employee should approach their line manager first.
- If they do not feel comfortable doing that, they should approach someone else they feel comfortable talking to (such as GBV specialist, the Director General or the grievance committee of the FMOEWR or the HR leads).
- The employee with a non-urgent grievance should write an email that includes what the grievance is all about, any evidence, i.e. texts, voice mails, contracts, pay slips among others to whoever is most appropriate – this could be their line manager, HR manager, Grievance committee, the Director General or the senior program coordinator.
- For urgent grievances, such as SEAH/SH, fraud and corruption, the complainant or the survivor should contact the GBV specialist and social specialist to get support and guidance and help resolution of her/his grievance.

Wherever possible the FMOEWR member whether the Program Coordinator or Grievance committee member should make an initial attempt to resolve a grievance informally. This can include speaking to the employee who has made the complaint in order to understand how they would like the matter to be resolved. The aim of the informal approach is to try to prevent the matter from escalating and to settle the problem early on. It is important during this stage to listen and take account of what the employee has to say, to reassure them that the complaint is being taken seriously and that it will be addressed.

If an informal approach is not appropriate or it does not address the grievance, then the employer will revert to the formal process.

ii. A formal meeting with the complainant

This will involve holding a grievance hearing with an employee in order to give for the employee to explain the grievance and provide details, information, or evidence to support the complaint. The employer should aim to establish the facts such as who, what, where, when why, and how the issue came to be. After the employee has fully

explained their grievance, it may sometimes be possible at this stage, depending on the nature of the complaint, to resolve it.

iii. Grievance investigation

Not all issues qualify for a hearing. Generally, it is essential to review whether the grievance is valid or not. Inquire about the incidents or situations and gather any relevant information. It may not always be necessary but if the matter involves other staff, they will need to be informed and given a chance to explain themselves and put forward their own shreds of evidence.

iv. Grievance outcome

Once the investigation has concluded and all of the facts established and considered a decision will then be made about whether to uphold all or part of the grievance or if to reject it. The decision should be communicated to the employee. If the grievance is upheld, it may be resolved at this stage. However, if it is part upheld or rejected or the employee remains aggrieved, the process may move on to the next stage.

v. Grievance appeal

The employee might not accept the decision and has the right to an appeal. The employee should start with an appeal letter to the concerned person, informing them why she/he wants the decision to be reconsidered. To ensure impartiality, the appeal should be heard by another manager or supervisor who was not a part of the first meeting. An appeal hearing with new evidence should follow this. The decision of the same should be informed to the employee in writing. If your employee is still not satisfied, it can either be mediated or escalated to the employment tribunal.

END