



GOVERNMENT OF SOMALILAND

ENHANCING PUBLIC RESOURCE MANAGEMENT PROJECT



GRIEVANCE REDRESS MANAGEMENT (GRM) MANUAL

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Abbreviations

CoC	Code of Conduct
CSO	Civil Service Organization
CSO	Civil Society Organization
EMSF	Environmental and Social Management Framework
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GOSL	Government of Somaliland
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
IP	Implementing Partner
LMP	Labor Management Plan
MIS	Management Information System
MOFD	Ministry of Finance Development
NGO	Non-Governmental Organization
PIM	Project Implementation Manual
PIU	Project Implementation Unit
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SERP	Enhancing Public Resources Management Project
SH	Sexual Harassment
WB	World Bank

Definition of Terms

Term	Definition
Complainant	An individual, group or organization that submits a complaint
Complaint	A complaint is a statement (verbal or written) or expression of displeasure concerning an impact or effect arising from a sub-project as unsatisfactory or unacceptable to the complainant. For the purposes of the SERP, a complaint is a concern about a minor impact or effect that is short term, low in risk, often temporary, that typically does not require an investigation but does require a specific response to remove or remediate the unsatisfactory or unacceptable impact or effect. Unresolved complaints may become grievances if not dealt with appropriately and within a short timeframe (typically 2 days but a maximum of 14 days). Complaints that are dealt with on the spot or resolved immediately can be referred to as minor complaints
Grievance	A grievance is statement about an action, impact or effect originating from a sub-project that adversely affects the rights, health and/or wellbeing of an affected person or group of people to the extent that it forms legitimate grounds for grievance and if upheld, may result in compensation, legal action or a change to the sub-project in order to resolve the grievance. For the purposes of the SERP, a grievance will require specific response and potentially a formal intervention by the PIU for resolution and such resolution must be formally agreed and recorded.
Grievance Log	A database for maintaining information about complaints received.
Implementing Partner (IP)	An entity that is contracted by the SERP to perform project-related tasks
Project Affected Person (PAP)	A project affected person is a person that is adversely affected temporarily or permanently as a result of sub-project works under SERP.
Severe Incident	A severe incident is an incident <i>that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g. fatality, GBV, forced or child labor.</i>

Introduction

1. This document provides guidance for the management of complaints and grievances under the Enhancing Public Resources Management Project (SERP). The purpose is to provide a suitable, centralized grievance redress mechanism (GRM) for the SERP that can be applied to meet the World Bank's ESF and national requirement.
2. Under the World Bank Environmental and Social Standards (ESSs), Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances'.¹ This Project GRM should facilitate the SERP to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project.
3. As per World Bank standards, this GRM makes the following distinctions:
 - a) Project-related complaints and grievances: it focuses on Project-related complaints and grievances and defines the different steps of handling such;
 - b) 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 referred to the GBV/SEA/SH referral pathways, which are laid out in the GBV/SEA/SH Action Plan. This counts for complaints and grievances from PAPs, as well as workers deployed by the project;
 - c) Labor-related complaints and grievances: Complaints from project workers raising workplace concerns, terms of employment and other related concerns will be registered through the Workers' GRM, which is a separate GRM elaborated in this document;
 - d) 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.
4. This document provides a manual for the SERP GRM. It lays out clear processes and procedures (including resolution processes and timelines), defines the grievance uptake, sorting and processing, acknowledgement and follow-up, categorization, verification and investigation, monitoring & evaluation, and feedback. It focuses on solving grievances at the community level where possible, and if necessary, escalating them to the appropriate higher levels.

¹ World Bank, Environmental and Social Framework, 2018, p. 131.

Objectives

5. The key objective of the GRM is to establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from project stakeholders. It is designed to offer project stakeholders an opportunity to seek and receive grievance redress; to strengthen the project's team ability to identify, track, resolve and refer eligible grievances; and to enhance the Project's development results and outcomes. The GRM is expected to contribute to continuous improvement in performance of the SERP through an analysis of trends and lessons learned. The GRM does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

Core Principles

6. The GRM is based on six core principles:

Fairness: Grievances are treated confidentially, assessed impartially, and handled transparently.

Objectivity and independence: The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).

Simplicity and accessibility: Procedures to file grievances and seek action are simple enough that PAPs can easily understand them. Project PAPs have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.

Responsiveness and efficiency: The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.

Speed and proportionality: All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.

Participation and social inclusion: A wide range of PAPs, including community members, members of vulnerable groups, project implementers, civil society, and the media, are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

Categorization of Grievances

7. Grievances will be categorized using the guidance summarized below, including basic information communication; public administration ethics and conduct; governance; human rights; environmental compliance; corruption and economic crimes. Grievances outside the SERP mandate will be referred to the appropriate statutory institution.

Categories of Grievances
1. Basic information
- Access to information
- Correction and deletion of untrue or misleading information that affects the person
2. Ethics and conduct
- Government entities and staff
- Implementing Partner staff
4. Violation and breach of codes of ethics
- Violation of codes of ethics;
- Breach of the code of ethics by government officers:
- Breach of Code of Conduct and Ethics by staff of Implementing Partners
5. Violation of human rights and fundamental freedoms
- Gender equality and general equality matters.
- Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities in political, economic, cultural and social)
- Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment)
- Non-discrimination of special needs groups
6. Corruption and Economic crimes
- Unethical conduct
7. Labor and working conditions
- Termination/Summary Dismissal,
- Breach of Employment Contract Terms
- Conflicts with Trade Unions
- Work Injury
- Discrimination
- Sexual Harassment

- Remuneration
- Wrongful termination
- Suspension
- Waiver of Claims
8. Environmental compliance violations
- Violation of environmental standards laid out in the ESIA's, ESMPs, and ESMF
9. Occupational Health and Safety (OHS)
- Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs
11. Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)
- Gender based violence committed by project personnel or any worker on the Project, or GBV committed in relation to the Project
- Sexual Exploitation and Abuse committed by Project staff or any worker of an IP associated to the Project
- Sexual Harassment committed by Project staff or any worker of an IP associated to the Project

GRM Value Chain

Step 1: Grievance Uptake

8. Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

9. There are four distinct means that must be made available at the project locality for people to file a grievance:

- i. A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 8.00 am to 5.00 pm excluding the lunch and prayer time every day through a toll-free number. The hotline operator is set up and managed by the Project Implementation Unit (PIU). Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English. The Hotline Operator will register the grievance (see also annex 6 for more detailed information) in the grievance log (see below). The Hotline Operator will be initially trained by the PIU in a) the registration of a grievance; b) the interaction with complainants; c)

appropriate responses to GBV/SEA/SH related grievances; d) workers' GRM; and e) SERP project components and IPs. After providing first appropriate responses to the complainant, and registering the grievance, the Hotline Operator will transfer the grievance to the relevant IP responsible for the grievance-related activity.

- ii. A help desk must be set up by the respective IP during the implementation of sub-project activities in an area.² They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regards to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk. The staff manning the desk will register the grievance in a GRM log book. The staff will be trained in a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEA/SH related grievances; and d) workers' GRM. The help desk can be open at hours decided on by the IP, which must be clearly indicated in a public space, and the Help Desk must be set up at a public space easily accessible and in close proximity of the sub-project activities. The PIU will train relevant IPs in the GRM procedures, including the implementation of Help Desks.
- iii. Relevant personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor or IP. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance. Each relevant staff will be trained by the IP or PIU in: a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEA/SH related grievances; and d) workers' GRM. Each IP will appoint a focal person for the GRM during project activities. This focal person will be trained by the PIU and will be in direct contact with the PIU for any assistance.
- iv. A suggestion box must be installed at the nearest IP office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as SERP-related feedback and grievance mechanism. The IP in the respective area is responsible for the setup and management of the box. The GRM focal person of the IP will man the box and hold the key. On the box the IP has to clearly indicate the frequency at which the Box is emptied.

² The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

Details of Grievance logged

10. While grievances can be submitted anonymously, the more information is made available, the better the Project can respond to the grievances, investigate the matter where necessary, or provide feedback to the aggrieved party (with the exception of cases of SEAH for which limited information is sought due to sensitivity of SEAH matters as detailed in the SEAH section). The minimum information that should be made available, with the exception of SEAH grievance, is the following:

1) Name of complainant	
2) Information on whether the identity of the complainant should remain confidential or can be made available where necessary	
3) Contact details: physical address, telephone number, email address	
4) Details of the grievance: <ul style="list-style-type: none"> - What happened - Where did it happen - Parties involved - Time when it happened - Description of the case - Supporting documents if available. 	

Submission of incomplete information for a grievance, with the exception of SEAH grievance, may not allow a case to be investigated or may delay investigations.

Step 2: Sort and Process

11. All registered grievances will be transferred to the GRM Focal Point at the respective IP either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point will categorize the complaint according to the table above (section on 'Categorization of Grievance'). Worker-related grievances will be handed over to a workers' GRM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the IP has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff (see below).

12. For grievances handled under the general Project GRM, the GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

13. The GRM Focal Point will also transfer the grievance information into a more comprehensive grievance register (see annex 2). All IPs must maintain a grievance register. The format should be similar for ease of reporting to the PIU (see Step 5).

14. Where IPs have an existing GRM in place, the GRM will be assessed by the PIU as for its compliance with the SERP GRM, and streamlining requested where necessary. The PIU will maintain a central grievance register for the logging, management and monitoring of grievances. Where IPs wish for complainants to remain confidential, they only have to share the nature of the case and the outcome/resolution with the PIU.

15. It is likely that at the local level, IPs will use books to maintain a record of grievances. The information will then be migrated to a digital platform at IP headquarters or when reported to the PIU. The GRM will then be linked to the Project MIS where possible. All cases will be treated confidentially.

Incident Reporting

16. Severe incidents (an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, e.g. fatality, GBV, forced or child labor) will be reported by the IP - within 24 hours - to the PIU and the World Bank (see annex 4 for guidance). All staff involved and IPs will be trained in the detection of ‘incidents’ and in how to report an incident, including severe incidents (see annex 4 and 5).

Step 3: Acknowledgement and Follow-Up

17. The respective IP will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first points of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

18. At all times, the IP (the GRM Focal Point of the IP) will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

The responses will include the following elements:

Type of Case	Actions Required	Response Required
GBV/SEA/SH		See below

Straight-forward cases with little anticipated complications	Minimal checks and consultations	<ul style="list-style-type: none"> - Acknowledge receipt of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communicate outcomes and next steps based on outcomes - 1-3 days
Cases that require some minimal processes	Delete misleading information, collect information, analyses existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information.	<ul style="list-style-type: none"> - Acknowledge receipt of the grievance, detail the steps to follow, and provide the appropriate practical timelines - 7 -14 days
Cases that require investigation	Access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches.	<ul style="list-style-type: none"> - Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response - 14 to 21 days
Cases that require escalation to higher SERP implementation level	Transfer case to relevant higher level HQ of IP or PIU.	<ul style="list-style-type: none"> - Acknowledge receipt of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response - 7-14 days
Cases that require referral to other institutions	Transfer case to relevant institution (National Police Service, World Bank)	<ul style="list-style-type: none"> - Acknowledge receipt of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress. - 7 - 21days

All feedback is documented and categorized for reporting and/ or follow-up if necessary.

Step 4: Verify, Investigate and Act

19. The IP, the GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

Verification

- Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project. Refer to the SERP PAD, PIM, EMSF, ESMPs/ESIAs, sub-project agreements or other documentation to determine the validity of the grievance
- Escalate outright grievances that require high level interventions within the IP
- Refer outright grievances that are outside the IP jurisdiction (e.g. refer to PIU or relevant external institution)

Once eligibility is determined, the IP will categorize the complaint into the following categories:

Grievance Category	Required Action
Queries, comments and suggestions	Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation	Grievances should be handled and resolved by the immediate manager within the GRM structure, e.g. the GRM Focal Point or a dedicated staff. The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.
Complaints and concerns that involve allegations that require investigation or interventions of a different kind	As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc... The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.

20. Investigation:

- IP/GRM Focal Point to appoint an independent investigator (Safeguards Expert, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report.

21. Grievance Action Plan

- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- Undertake mutually agreed follow-actions
- Update of complainant IP GMR Team
- Provide users with a grievance redress status update and outcome at each stage of redress, (iii) update the IP team on grievance redress across the GRM value chain.

Step 5: Monitor, Evaluate and Provide Feedback**22. The IP/GRM Focal Point will provide feedback to GRM users and the public at large about:**

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

23. The IP will report on its GRM to the PIU on a monthly basis. Monthly reporting to the PIU should provide information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.

24. The PIU will undertake the following monitoring actions:

- develop indicators for monitoring the steps of GRM value chain;
- track grievances and assess the extent to which progress is being made to resolve them;
- conduct a stakeholder satisfaction survey for the GRM services;
- conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact;
- provide a report on grievance redress actions pertaining to the steps of GRM value chain.

25. The PIU will evaluate the GRM by
- analyzing grievance data to reveal trends and patterns;
 - sharing GRM analysis in management meetings; and
 - taking corrective action on project implementation approaches to address the grievance.

GBV, Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

26. Cases of GBV/SEA/SH can be reported through the general Project GRM, a GRM grievance recipient cannot reject a GBV/SEA/SH complaint. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All relevant staff of the PIU, Hotline Operator and IPs should receive training on receiving GBV complaints and referral systems during the initiation phase of their sub projects and as part of the staff welcome package. The GRM Hotline Operators will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward them to the GBV/SEA/SH referral system.

27. The PIU GBV and Gender Specialist will be the key focal point for any such grievances and concerns and will work closely with respective GBV Specialist counterparts at the IPs in the implementation of the GBV/SEA/SH Action Plan, which contains all information on the GBV/SEA/SH referral system.

28. The GRM Operator, and all other GRM case recipients (staff manning Help Desks, and local personnel) will ensure appropriate responses vis-à-vis the complainant/survivor by 1) providing a safe caring environment and respect the confidentiality and wishes of the survivor; 2) If survivor agrees, obtain informed consent and make referrals, 3) provide reliable and comprehensive information on the available services and support to survivors of GBV.

29. However, additional channels for reporting GBV/SEAH complaints are identified and integrated into the GBV/SEAH and Child Protection Risk Action Plan (see Environmental and Social Management Framework). Given the sensitive nature of GBV complaints, the GRM will provide different ways to submit grievances such as phone, text message and email.

30. Beneficiaries and communities should generally be encouraged to report all GBV/SEAH cases through the dedicated GBV/SEAH referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. The GBV/SEAH Action Plan referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so.

If such cases are reported through the described GRM pathway, the GRM Hotline Operator needs to report the case within 24 hours to the PIU, as the PIU is obliged to report any cases of GBV/SEAH to the World Bank within 24 hours following informed agreement by the survivor.

31. Furthermore, all GBV/SEA/SH related cases that are related to any type of Project workers (as defined in the LMP) must be reported by the grievance recipient to the respective employer, so internal PSEA procedures can be applied. They must also be reported to the PIU, to allow the PIU to follow up on the case and ensure that no worker that has been found guilty of a GBV/SEA/SH case remains on the project, and that appropriate punishments for the violation of CoCs applies.

32. All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Workers' Grievance Redress Procedure

Objectives of the procedure

33. The objective of this procedure is to settle the grievance between employer and employee or between employees bilaterally before the intervention of the formal court, except in cases where the grievance constitutes a criminal offense that requires notification of the law enforcement agencies.

34. Procedure

- i. All IPs only to contract sub- contractors with registered code of conduct or who sign an undertaking to comply with the provisions of the Employment Act for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.
- ii. Contractors induct the employee on the applicable workers' grievance redress mechanism, and on all relevant workers' rights. All records of induction shall be kept and made available for inspection by the PIU and/or the World Bank.
- iii. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
- iv. The supervisor will verify the details and seek to address the matter within the shortest time up to 48 hours.
- v. The supervisor will escalate the matter if not resolved within 48 hours until a resolution is found or not found.
- vi. Where no resolution is found, the employee can either escalate the matter to the 2nd Tier / Appeals mechanisms (see below), or to the sector specific institutions or courts

- to resolve the matter between employer and employee. The Supreme Court's decision is final.
- vii. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to the 2nd Tier / Appeals mechanism described below.
 - viii. The Contractor shall keep records of all proceedings of grievance redress that are within its jurisdiction and furnish the PIU as part of the periodic progress reporting to the PIU.
 - ix. All grievances of sexual nature (GBV/SEA/SH) experienced by a worker should follow the referral pathways and complaints resolution mechanism laid out in the GBV/SEA/SH Action Plan. A worker has the right to launch such complaint with any supervisor at any level, with the IP in the case of a sub-contractor, or directly with the PIU. All personnel shall be trained appropriately in the reception of such cases and in providing appropriate referrals.
 - x. All GBV/SEA/SH cases must also be reported to the IP Project Manager or the PIU GBV/Gender Expert to allow for appropriate follow-up of organizational SEA mechanisms and for follow-up on the potential violation of the CoC.
 - xi. In case of risk of retribution, the employee may immediately escalate to the court system [6] or to the PIU as noted under [7]. If confidentiality is requested, the PIU will ensure to avoid any risk of retribution, including in its follow-up actions.

Process for Escalation of Grievances / Appeals

35. Where affected parties are dissatisfied with the outcomes of the grievance process handled by the IP, or where workers are dissatisfied with the solutions provided by the employer (IP or sub-contractor), the parties have the right to escalate the matter directly to the IP (in the case of workers of sub-contractors) or to the PIU (in all other cases). For this purpose, a phone number, as well as an email address of the PIU will be disseminated. Alternatively, aggrieved parties that are dissatisfied with the grievance handling by the IP can contact the Hotline Operator and request to file the grievance directly and explicitly with the PIU, indicating its previous history.

36. Where a negotiated grievance solution is required, the IP/PIU will form a 2nd Tier Grievance Redress Committee, which will consist of one neutral external individual that commands legitimacy for the resolution of conflicts, the Social Safeguards Specialist, and the respective Project Manager. The Committee will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

37. Where a grievance is escalated to another institution or level, the complainant will be provided with the appropriate information, including the date it has been escalated, and a decision is expected. Any complainant who is still not satisfied may resort to arbitration or mediation, or the court as last resort.

38. Where aggrieved parties are dissatisfied with the response of the 2nd Tier / Appeals mechanism, they can report cases directly to the PIU.

39. A grievance is considered closed after an amicable solution has been reached between the complainant and the responding party. However, in some situations the IP or the PIU may 'close' a grievance, even if the complainant is not satisfied with the result. This is the case, for example, where the aggrieved party cannot substantiate the grievance, or where an obvious speculative or fraudulent attempt has been undertaken. In such a circumstance, all steps laid out above will be undertaken before reaching a conclusion. All information will be documented and communicated to the complainant without putting the lives of those who provided information in danger.

40. IPs and the PIU should not dismiss any grievance based on a hasty review and closure of an investigation before the complainant has been notified and given an opportunity to provide additional information. The decision to close such grievances required the endorsement of the GRM Focal Point in the IP organization, or the Social Development Specialist in the PIU.

World Bank Grievance Redress Service

41. Communities and individuals who believe that they are adversely affected by a World Bank 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/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

Institutional Arrangements

42. The PIU has the main responsibility for the implementation of the GRM. The GRM Team within the PIU consists of the Environmental Safeguard Specialist, Social Development Specialist and the Project Coordinator, related day-to-day tasks rest specifically with the Social Development Specialist (SDS). The GRM will be implemented and monitored by the Social Development Specialist. The SDS will receive and process grievances directed to the PIU, manage appeals mechanisms, monitor the implementation of the GRM through the Hotline Operator and the IPs, manage the Hotline Operator, and register and file all GRM reports incoming from IPs, 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 IP GRM implementation, and the identification of trends and analysis of the GRM reports in order to be able to flag key issues with Project Management.

43. Each IP/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 IP (through help desks, suggestion boxes and directed by the Hotline Operator). The PIU's Social Development Specialist will be sharing all necessary information with the IP on this matter, and will monitor the IP's awareness creation locally of the GRM, the implementation of help desks at project sites and the handling of grievances by the IP.

44. The IP should 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.

Annex 1: Online GRM Form

Reference No: _____

Details of Complainant:

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

Full name: _____

 I wish to raise my grievance anonymously I request not to disclose my identity without my consent Contact **By Mail:** Please provide mailing address:

Gender of Complainant:

Age of Complainant:

Contact InformationPlease tick how you wish to be contacted: - E-mail, Telephone, In Person By Telephone: _____ By E-mail _____**Preferred Communication:** Somali, English One time incident/grievance Date ____/____/____ Happened more than once (how many times) _____ On-going (currently experiencing problem)**Description of Incident or Grievance:**

Location of grievance:

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

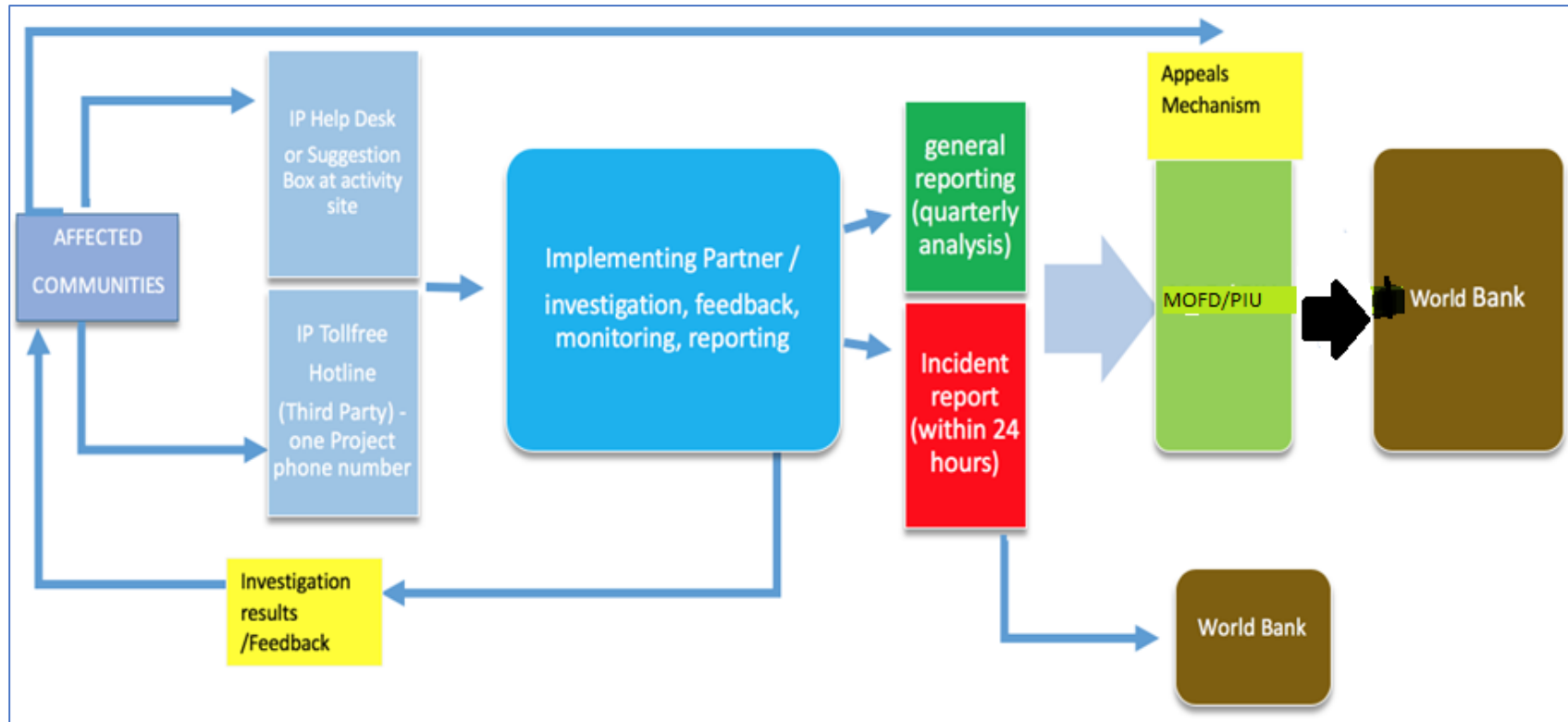
What would you like to see happen to resolve the problem?

Annex 2: Grievance Register

The grievance register will contain the following information (ideally in an excel file, or if at local level in a book) :

Type of Information	Response
Complaint/ Log number	
Reference document (s)	
Date complaint made	
Date complaint received	
Category of Grievance	
Method of Logging: Direct Communication; Suggestion Box; Toll-free Line;	
Complainant name (state if anonymous)	
Location in which complained action took place (district, village)	
Caller contacts for follow up	
Gender	
Age	
Parties against whom complaint is made (Unit/contractor/Agency etc)	
Nature of Complaint ["SEA/GBV"; "Timing of Payment"; "Amount of Payment"; "Inclusion or Issue regarding Project benefits" or create standard categories based on complaint type]	
Description of Complaint	
Nature of feedback (describe)[In case issue type is GBV/SEA immediate referral to the GBV referral system]	
Verification and investigation (describe)	
Recommended action (describe)	
Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	
Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date Resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

Annex 3: SERP Grievance Redress Mechanisms Flowchart



Annex 4: Incident Classification Guide

World Bank Incident Classification Guide:

Indicative

- Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people
- Does not result in significant or irreparable harm
- Failure to implement agreed E&S measures with limited immediate impacts

Serious

- An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources
- Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents
- Failure to remedy Indicative non-compliance that may potentially cause significant impacts
- Is complex and/or costly to reverse
- May result in some level of lasting damage or injury
- Requires an urgent response
- Could pose a significant reputational risk for the Bank.

Severe

- Any fatality
- Incidents that caused or may cause great harm to to the environment, workers, communities, or natural or cultural resources
- Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed
- Failure to remedy Serious non-compliance that may potentially cause severe impacts Is complex and/or costly to reverse
- May result in high levels of lasting damage or injury
- Requires an urgent and immediate response
- Poses a significant reputational risk to the Bank.

Annex 5: Incident Report Form

An incident report should contain the following information:

Incident Report Form

Please report any incident within 24 hours to the PIU

Implementing Partner	
Subproject / Activity	
Report Date	
Reported By (Name and Title)	

i. Details of Incident

Incident Date	
Incident Time	
Incident Place	

ii. Identification of Type of Incident and Immediate Cause

1. Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

Type of Incident: (and incident can cover more than one type):

Type of Incident – Health & Safety		Type of Incident – Social	Type of Incident - Environmental
Moving Machinery/vehicles at project site	Dust, Fumes, Vapours that impact the population and/or environment	Misuse of SERP property	Chemical/Oil Spill with impact on population and/or environment

Powered Hand tools	Noise	Damage to Cultural Heritage	Improper Disposal Waste
Hand Tools	Temperature or heat	Occurrence of infringement of labor rights	Disasters (Earthquake, Flood, etc)
Animals or insects	Overexertion	Occurrence of infringement of human rights	Water Pollution/ Sedimentation
Fire or Explosion at project site	Structural Failure	Strike, demonstration	Damage to ecosystems (e.g. damage to flora/fauna)
Trips & smaller falls	Chemical/biological	Other (please specify)	Odor air Emissions
Drowning	Stress	GBV/SEA or Child Risks	Dust, Fumes, Vapors, Air pollution with impact on population and/or environment
Borrow-pit Management	Other (please specify)		Other (please specify)

2. For each type of incident, select the relevant descriptor(s) from the list. You can select up to 5 descriptors for each type of incident. If a descriptor is not listed below, please type in short descriptor in "Other". Add more rows as necessary.

Incident Type	Descriptor 1	Descriptor 2	Descriptor 3	Descriptor 4	Descriptor 5	Other
H&S						
Social						
Environmental						

Provide a description of the immediate cause of the incident:

iii. Description of the Incident

Record all facts prior to and including the incident, if it was a planned activity, describe/list material, ecosystem and property damaged, etc:

iv. Root Cause Analysis

Select the root cause(s) of the incident from the list below. If 'Other', please specify:

Root Cause	Yes	No
Improper Planning		
Poor Maintenance		
Poor Supervision		
Poor Quality of Equipment		
No rules, standards, or procedures		
Lack of knowledge or skills		
Improper motivation or attitude		
Failure to comply with rules		
Other		

Additional Questions:

- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- What measures have been or are being implemented by the Implementers

Annex 6: Guidelines for Hotline Operators

The Hotline Operator has to be familiar with the SERP Project as a whole; with all IPs implementing the SERP (including their key contact persons and contact details); the content of these 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. For more details see the 'GRM Value Chain' above.

Receive incoming Calls

- Receive calls promptly; avoid keeping callers waiting unnecessarily
- Be pleasant when receiving calls and make callers feel that you are happy to be of service to them
- Greet callers when you receive calls, introduce yourself and indicate that they have reached the call-centre number which deals with grievances and complaints within the SERP project
- Request to know how you can be of help to them
- Inform the caller that they may identify themselves BUT that they can also choose not to

Receive Report / Behavior while recording

- Inform the claimant that (a) everything he or she says will be treated with utmost confidentiality and that (b) the information will be used strictly for the purpose of resolving any grievance or complaint reported
- Inform the claimant that you are recording what he or she will say and that he or she should TRY and speak slowly and clearly to facilitate this
- While recording:
 - (a) listen very keenly and make the claimant feel that you are concentrating on them and not dividing your attention
 - (b) ask the caller/claimant to repeat anything you do not hear well
 - (c) ask the caller to explain anything you do not understand or clarify anything that is not clear
 - (d) avoid expressing any opinion which may suggest that they are not speaking the truth
 - (e) ensure that what you record is substantively as stated or as close as possible to what the claimant states

Record Information

- Ensure that you record all the necessary information
- Where the claimant indicates that he or she needs to refer to something or somebody, give him or her reasonable time to do so
- Where the claimant indicates that he or she is thinking about something or trying to remember something, give him or her reasonable time to do so
- Where a claimant indicates that he or she do not have the information but can get it later, arrange for this after the session
- Record all the necessary personal information that the claimant *agrees* to give, but ensure that you get information that can facilitate a request for more information or feedback
- Personal:
 - (a) Name and ID number (both optional), contacts (telephone number, post office box number, e-mail address, geographical location)
 - (b) Whether the claimant wishes that his or her identity is kept confidential
 - (c) Activity
 - (d) Relevant IP
 - (e) Most appropriate feedback mechanism
- Grievance:
 - Nature of grievance: get as full a description as possible
 - Parties involved
 - Place/location, date and time of occurrence
 - Whether a one-off or recurring occurrence
 - Consequences and any suggested actions

