



INVESTING IN FORESTS AND PROTECTED AREAS FOR CLIMATE SMART DEVELOPMENT PROJECT (IFPA-CD)

GRIEVANCE REDRESS MECHANISM

**Department of Environment Support Services
Ministry of Water and Environment
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LIST OF ACRONYMS

DESS	Department of Environment Sector Support Services
DFP	District Focal Point
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IFPA-CD	Investing in Forests and Protected Areas for Climate Smart Development Project
MTWA	Ministry of Tourism, Wildlife and Antiquities
MWE	Ministry of Water and Environment
NEMA	National Environment Management Authority
NFA	National Forestry Authority
UWA	Uganda Wildlife Authority
VGRC	Village Grievance Redress Committee

1. INTRODUCTION

1.1 Background

The Investing in Forests and Protected Areas for Climate Smart Development (IFPA-CD) project is jointly developed and implemented by Ministry of Water and Environment (MWE) as the Lead Agency and Ministry of Tourism, Wildlife, and Antiquities (MTWA). Implementation of the project activities will be led by the MWE (User departments), National Forestry Authority (NFA), and Uganda Wildlife Authority (UWA) with the involvement of MTWA in tourism-related activities. Implementing agencies will collaborate with Office of the Prime Minister (OPM) and United Nations High Commission for Refugees (UNHCR) in activities implemented in the refugee-hosting areas. Implementation will be overseen by the Project Steering Committee, jointly chaired by the MWE and MTWA. The project closes on June 30, 2026, and it seeks to improve sustainable management of forests and protected areas and increase benefits to communities from forests in target landscapes.

The project geographic area includes the Albert Rift and West Nile region, with focus on target protected areas (7 National Parks - NPs, 4 Wildlife Reserves - WRs, 28 Central Forest Reserves - CFRs) and 18 refugee host districts¹. Activities under subcomponent 2.2 will have a national coverage.

The project is structured in four main components and eight sub components (Table 1-1).

Table 1.1: Project components and subcomponents

Component	Sub-component
Component 1. Improved management of forest protected areas	1.1. Improvement of infrastructure and equipment for the management of forest protected areas
	1.2. Increasing the involvement of local communities in the management of forest and wildlife areas by increasing their access and benefits from these areas
	1.3. Restoration of degraded natural forests and habitats in Wildlife and Forest Protected Areas
	1.4. Increased forest protection in CFRs and WRs in close proximity to refugee settlements
Component 2. Increased Revenues and Jobs from Forests and Wildlife Protected Areas	2.1. Investments in tourism
	2.2. Investments in productive forestry
Component 3. Improved landscape management in refugee-hosting areas	3.1. Increased tree cover on community and private land
	3.2. Supporting farm forestry for refugee fuel supply
Component 4. Project management and monitoring	

¹ Based on the July 2020 boundaries.

1.2 Definition of a Grievance under IFPA-CD project

A Grievance refers to a complaint, a feeling of dissatisfaction, an injustice, a wrong doing, an accusation, or criticism. It may include queries, suggestions and comments. A grievance may be mistaken to be “a case”, however, the two concepts are different. A case is a question contested before Courts of justice or an equivalent legal process. Examples of likely grievances are disagreement on boundary between a Protected Area (PA) and private land or damage to crops during construction of an electric fence around a PA. It is therefore important to establish a robust Grievance Redress Mechanism (GRM) for better management of project related grievances as well as serving as a channel for registering positive feedback on project implementation.

1.3 Justification for a robust GRM under IFPA-CD Project

The GRM is an inclusive and participatory entity that is aimed at facilitating communication between conflicting parties, promoting dialogue, and facilitating a reasonable agreement between the parties to a grievance. The GRM is expected to objectively determine facts and draw conclusions from them so as to provide the basis for action. The GRM is designed to contribute to conflict detection, prevention and resolution, as well as the transformation of the grievance into peaceful co-existence and community cohesion. It will help to channel grievances into an acceptable, institutionalized system for resolving conflicts that are likely to occur during project implementation. It focuses on dialogue and problem solving as an intermediate way for stakeholders to discuss and resolve grievances.

The implementation of GRMs is known to be influential in enhancing resilience and identifying and mitigating project risks and impacts from early in the project cycle. GRMs provide predictable grievances resolution processes that are regarded as effective and fair. The implementation of good practices coupled with a grievance management framework helps project implementers identify the key environmental and social management actions, community benefit provisions, and comprehensive decision-making processes that are required to avoid disruptions during project implementation.

It is also important to note that the Environmental and Social Standard ten (ESS 10) on stakeholder engagement and information disclosure under the World Bank’s Environmental and Social Framework (ESF) requires that an inclusive and responsive grievance mechanism accessible to all project affected parties and proportionate to project risks and impacts be established.

The IFPA-CD Project GRM aims to provide a fair, legitimate, reliable, and cost-effective redress procedure to enable PAPs and other interested parties present their grievances and find satisfactory resolutions. It is also a critical tool for promoting transparency and accountability in accordance with the ministry guidelines as well as for World Bank funded projects. It is therefore important to have a GRM to properly handle project related grievances.

Over-all, the GRM will provide the following benefits to the project and affected persons, among others;

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- a. Enhance information sharing about the project;
- a. Provide cost effective method for channeling complaints/ grievances;
- b. Provide an avenue for resolving grievances and disputes at the lowest project level;
- c. Community will be able to report their grievances with dignity and also receive a fair hearing;
- d. Facilitate speedy resolution of conflicts before they escalate;
- e. Facilitate access to information;
- f. It will help project implementers win the trust and confidence of the community;
- g. Prevent adverse impacts to the community; and
- h. Help to avoid project delays and cost overlaps thus improving quality of work.

1.4 Implications for not having a GRM

The consequences are numerous and adverse including inability to register and build on positive feedback, Project Affected Persons (PAPs) may seek redress/ resolution from judicial or administrative systems which are cumbersome or inappropriate to addressing project triggered grievances because they tend to be hostile or foment violent behavior towards the project or waste time and resources, derail benefits and possibly cause high cost overruns, deprive people's right to be heard in a just and fair manner, or cause adverse impacts on people and the environment which could lead to a risk of possible suspension or cancellation of the project.

2. THE IFPA-CD PROJECT GRM

2.1 The GRM

A grievance redress mechanism under IFPA-CD refers to the institutions, instruments, methods, and processes through which resolutions to grievances are sought and provided. It spells out the procedure for receiving, assessing and addressing grievances and complaints. It is premised on the anticipation that activities of the IFPA-CD project will generate grievances that may cause negative impacts on the Project Affected Persons (PAPs).

The GRM will provide an effective avenue for expressing concerns and achieving remedies for communities, promote a mutually constructive relationship and enhance the achievement of Project development objectives. It has been learned from many years of experience that open dialogue and collaborative grievance resolution simply represent good business practice both in managing social and environmental risk and in furthering Project and community development objectives. In voicing their concerns, they also expect to be heard and taken seriously. Therefore, MWE, UWA, NFA and districts have to assure people that they can voice grievances and the Project will work to resolve them without bias. The Project GRM will be augmented by the MWE and World Bank's Grievance Redress Services (GRS). The latter provides an easy way for Project-affected communities and individuals to bring their grievances directly to the attention of Bank Management. The GRS will ensure that complaints are directed promptly to relevant Bank Task Teams and/or Managers for review and action, as appropriate. The goal is to enhance the Bank's involvement, responsiveness, and accountability. For information on how to submit complaints to the World Bank's corporate 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.

An IFPA-CD Project specific GRM was recommended in the Projects Environmental and Social Management Framework (ESMF) and the Vulnerable and Marginalised Groups' Framework (VMGF). The frameworks provided an outline for developing a GRM and establishing Grievance Redress Committees (GRC) at various levels as appropriate.

The project GRM will provide a credible and accessible means for Project Affected Persons (PAPs) and other stakeholders to pursue grievances, allowing the Project to address genuine issues in a timely manner and to minimise on the chances of distractions to Project implementation and ownership from disgruntled PAPs/stakeholders. Grievances relating to any aspect of the IFPA-CD Project will be dealt with through negotiations aimed at reaching consensus between the Project and the PAPs, following agreed principles and procedures that will be discussed in later sections. Dedicated Information, Education and Communication (IEC) materials (GRM brochures, pamphlets, posters) will be created to help residents in the project areas to familiarize themselves with the grievance redress channels and procedures.

For effectiveness, the IFPA-CD Project GRM has been designed to encourage and ensure:

- Transparency, fairness and inclusiveness;
- Legitimacy and trustworthiness;
- Scaled to the risks and potential adverse social and environmental impacts of the project;
- It is publicized and accessible;
- Appropriately tailored to all potentially affected persons and communities and other interested parties, irrespective of their literacy levels;

- Free of cost for the PAPs and other stakeholders;
- Includes the anonymity option, where feasible, and guarantees confidentiality in handling requests, if so, requested by the complainant;
- Is guided by engagement dialogue; and
- Is Predictable in terms of process, timeliness, and access to information.

2.2 Purpose

The GRM is designed to act as recourse for situations in which, despite proactive stakeholder engagement, some stakeholders may have a concern about the project's potential impacts on them. Ultimately the purpose of the GRM is to find a win-win solution and in case the GRM fails, the parties to a grievance may resort to the formal courts at any stage of the grievance resolution process. It is intended to complement, not replace, formal legal channels for managing grievances (e.g. the court system, organizational audit mechanisms, etc.).

2.3 The Objective of GRM for IFPA – CD

The main objective is to detect and prevent the grievances before they occur, and mitigate their consequences when they occur, as well as prevent them from escalating. The Specific objectives are:

1. To receive and resolve project related grievances in a timely, appropriate and efficient manner;
2. To build trust among project staff and communities;
3. To promote community empowerment and participation in project decisions that affect them; and
4. To provide feedback mechanisms to project affected persons on resolution of their complaints.

2.4 Principles of Grievance Redress Mechanism

The GRM has been designed according to the following eight internationally accepted principles for the design of GRM:

1. **Accessibility** – provides adequate assistance to those who wish to access it, including specific groups such as children, women and the disabled accessibility needs to take into consideration language, literacy, awareness, finance, distance or fear of reprisal.
2. **Predictability** – offers a clear and known procedure, with timeframes for each stage, clarity on the types of processes and outcomes it can and cannot offer, and means of monitoring the implementation of any outcome.
3. **Fairness** – all decisions shall be perceived as fair and objective especially in terms of access to information and opportunities for meaningful participation in the final decision
4. **Rights compatibility** – it is with applicable national and international standards; should not restrict access to other redress mechanisms
5. **Transparency** – procedures and outcomes or decisions shall be made public and in a transparent manner
6. **Capability** – shall have required technical, human and financial resources to deal with issues at stake
7. **Feedback** – Should serve to channel citizen feedback to improve project outcomes for the people

8. **Legitimate:** has clear, transparent, and sufficiently independent governance structure to ensure that there is no bias or interference and the process can be conducted fairly with respect to all parties

In addition to the above principles, the following shall also be considered;

- The grievance redress procedure to be followed will consider existing and effective community and traditional dispute settlement systems.
- The GRM and its application will be widely disseminated to all stakeholders, through Local Council structures, NFA/UWA field offices, GRM structures, NGOs/CBOs;
- Grievance review will be done independently and impartially to foster the trust and confidence of all stakeholders.
- All methods and results of consulting the public including the management of grievances will be documented/recorded and be disclosed to the affected persons as appropriate.
- The principle of confidentiality of the issues/information and anonymity of the complainant will apply to GRM processes as appropriate.

3. THE GRM STRUCTURE

3.1 Introduction

The GRM will be grounded on existing local dispute management models/mechanisms that will involve the local leaders and technical staff in providing a forum for listening to, and resolving grievances. The GRM will be spearheaded by Grievances Redress Committees (GRC) established at appropriate levels.

The Composition of the GRC will take into consideration the technical competencies of the GRC members at all levels to receive and resolve grievances. The members shall be formally assigned responsibility to work with the respective committees. In choosing the members, consideration shall be given to the diverse stakeholder interests in the participating project areas and the need for balancing geographical and gender distribution. The GRCs shall co-opt members to the respective committees as and when the need arises.

It is expected that all grievances shall be received and resolved at the lowest level (village level). However, there is provision for referrals in the case of grievances escalating to the next level.

3.2 The GRM Structures

The IFPA-CD Project GRM has adopted a four level structure to ensure grievances emanating from all stakeholders are captured and resolved.

3.2.1 National level

The National Level GRC shall be chaired by the Commissioner, Department of Environment Sector Support Services (DESSS) and the secretary shall be the Social Risk Management Specialist. Other members shall include; the Environment Risk Management Specialist and nominated officers from MTWA, UWA, NFA and OPM. The National Level GRC will handle all appeals not resolved at district level.

3.2.2 Level 1: Village level Grievance Redress Committee (VGRC)

This will be the lowest unit upon which all grievances will be channeled and handled before escalating unresolved grievances to higher levels. Well aware that the motivation to seek for redress is critical, it is therefore important that the mechanism originates from the benefiting community members.

The committee will comprise of 7 members and shall be chaired by the Parish Chief in charge of the respective village. The Local Council 1 (LC1) chairperson shall be a member and the 5 members shall be elected in the village. One of the members shall be elected as secretary. The one third gender rule will be applied to ensure representation of women, youths and ethnic balance.

3.2.3 Level 2: The Sub county level Grievance Redress Committee

This will be established to deal with grievances unsettled at the village level. It will comprise of 7 members including; the LC 111 Chairperson (The chair, GRC), the Sub county chief, Sub county Community Development Officer (Secretary), Councilor in charge of Production, opinion/ religious leader, NGO/CBO representative and a representative of vulnerable groups (women etc.) as member

3.2.4 Level 3: District level Grievance Redress Committee

This will be established to deal with any grievances unsettled at the sub county levels. The GRC at the district will at a minimum comprise of 7 members; the Chief Administrative Officer (the Chairman), the District Community Development Officer (DCDO), District Forest Officer (DFO), District Lands Officer (DLO), District Agriculture Officer (DAO), District Environment Officer (DEO) and representative of NGO forum. The DCDO shall be the secretary to the District GRC.

3.3 Roles and Responsibilities of Grievance Redress Committees

The roles and responsibilities of the GRC are presented in Table 3-1

Table 0.1: Roles and responsibilities of GRCs

GRC	ROLES AD RESPONSIBILITIES
National Level GRC	<ul style="list-style-type: none">• Ensure grievance redress processes are developed and functional• Sensitize GRCs at all levels on their roles and responsibilities• Ensure complaints registers are up to date• Follow up on complaints that have been directed to the national level• Monitor implementation of resolutions made by GRCs at all levels• Share best practices and general guidance to the IFPA-CD project• Conduct sensitization and awareness outreach to relevant stakeholders• Maintain all records of grievances and redress• Analyze common grievances, lessons learning to inform effective program implementation and mitigation measures in future
District Level GRC	<ul style="list-style-type: none">• Sensitize Sub county GRC on rights and responsibilities and channels for registering a complaint• Follow up on complaints that have been directed to the district level and see that they are resolved• Conduct quarterly review meetings on Sub county GRC report• Forward unresolved complaints which may require higher level solving to national level GRC
Sub county level GRC	<ul style="list-style-type: none">• Sensitize village level GRCs and community members on rights and responsibilities and

	<p>channels for registering complaints</p> <ul style="list-style-type: none"> • Follow up on complaints directed to the Sub county level and see that they are resolved • Ensure complaints registered are properly logged and received appropriately • Ensure documentation specifically the log book, registers, forms etc. are properly filed and stored • Forward unresolved complaints which may require district level solving
Village level GRC	<ul style="list-style-type: none"> • Point of contact for beneficiaries and community to file or follow up on grievances • Sensitize community on rights and responsibilities and channels for registering a complaints • Follow up on complaints registered in the complaints boxes directing as appropriate • Log complaints received appropriately • Compile all complaints registered and forward to the Sub county level for review and solving for those that might have not been resolved at community level.

4. THE GRM PROCESS

The GRM is designed with the objective of solving grievances at the earliest possible time, which will be in the interest of all parties concerned. Therefore, the internal complaint resolutions systems (GRCs) of the IFPA-CD Project GRM will be strengthened to minimize on potential escalation of complaints to the national level or courts of law.

Those seeking redress and wishing to state grievances will do so by notifying any member of the GRC or the GRC contacts provided and publicized in the project areas. Should some PAPs register their complaints with project staffs, they should have them registered with the GRC. If the complainant's claim is unresolved, under the village GRC, the matter shall be brought before the Sub- County GRC.

The GRM process will involve the following steps: receiving, acknowledging and recording grievances; sorting and categorization; and giving feedback.

4.1 Receiving, Acknowledging and Recording Grievances

All grievances shall be received, acknowledged and recorded at village level. The secretary of the GRC will be in charge of receiving the grievance and recording in the Grievance Registration form (Annex I). Acknowledgement will be within 24 hours and will include; outlining the grievance process; providing contact details of the contact person that is responsible for giving feedback about the grievance; giving an indication of how long it is likely to take to resolve the grievance. Complainants shall be periodically updated on the status of their grievances.

4.2 Sorting and categorization

Acknowledgement of grievances received will be followed by sorting and categorizing it for appropriate action. The analysis and categorization will be based on the following criteria:

- a) Is the grievance within the scope of the project, i.e. is it attributable to project activities or staff?

A GRC has no role in addressing a grievance that is outside the scope of the project but should give a feedback on the same to the complainant, and where possible forward it to relevant offices

- b) Is it a sensitive or non-sensitive grievance?

Non-sensitive grievances are those that relate directly to the projects interventions and have a potential of being verified and resolved within the GRM structures according to the procedures laid out in these guidelines. Such include grievances related to the project activities, project funding, discrimination and communications.

Sensitive grievances are those that relate to the project but may require a more complex investigation and resolution processes. Such include: misuse of funds, corruption or fraud, conflict of interest, political interference, contravention of signed agreements, as well as gender and sexual based harassment or exploitation.

Further analysis of grievances will be undertaken to identify the specific nature of the grievances as per the following criteria:

- i. Non inclusive
- ii. Quantity of services
- iii. Quality of services
- iv. Timeliness of services
- v. Conflict of interest
- vi. Behavior of staff
- vii. Recruitment
- viii. Procurement of commodities or services
- ix. Political interference
- x. Bribery
- xi. Embezzlement
- xii. Fraud
- xiii. Data or information provision
- xiv. Environmental degradation
- xv. Environmental pollution
- xvi. Timeliness of services
- xvii. Access to sub project resources
- xviii. Resource based conflicts
- xix. Gender based violence
- xx. Child abuse

4.3 Verification and resolution

Verification of the grievances logged at village level will be done by the GRC to establish whether it is genuine or not and to ascertain its authenticity. The merit of grievances should be judged objectively against GRM principles.

Grievances that are straightforward (such as queries and suggestions) will be resolved on the spot or immediately by contacting the complainant. Whenever possible, GRC and project affected persons are encouraged to resolve grievances immediately. However, even if a grievance is resolved on the spot it must be recorded for knowledge management. If a grievance cannot be resolved immediately the complainant should receive a response within seven (7) working days

Grievances not resolved at village level will be escalated to the higher level of GRCs for further verification and investigation. GRCs will ensure neutrality in the process and outcome of the investigation. If after exhausting the project institutional structures, beneficiaries are still dissatisfied with explanations and solutions offered, they will have the option of seeking justice through courts of law.

4.4 Giving feed back

Feedback refers to the process of informing the complainant, all GRM users and the public at large about the result of the grievances investigated and resolved as well as the actions taken. Once a grievance has been resolved, the GRC will provide feedback to the complainant. The feedback shall have clarity in conveying the decision reached to allow the complainant whether to appeal or not. GRC will provide feedback to the complainant directly through verbal communication (if his or her identity is known) and/or by posting the results of cases in high profile locations, disclosure in public meetings or publish and circulating the resolutions or closure report. Both the date and the resolution shall be recorded in the grievance log register.

4.5 Safe handling of grievance records

The grievance forms and the grievance log register shall be kept in a safe place that is only accessible by the secretary to the GRC. The grievance records shall be archived at the end of the project and be subjected to the government data disposal guidelines.

4.6 Anonymous grievances

A grievance received anonymously needs to be assessed to identify whether it is substantial or not and if found substantial, actions shall be taken to resolve it. This may involve holding meetings with community members to disclose the resolution of the GRC. Despite lack of an avenue to acknowledge and respond directly to the complainant, such a grievance shall be considered as a warning signal to the project or an indication of underlying discontent. Such grievances including those found to be malicious shall be documented and taken into account during the general risk analysis of the project.

4.7 Right to Appeal

A complainant who is not satisfied with the response received despite having had the opportunity to request for further clarification or feedback, he/she has the right to make formal communication to the Social Risk Management Specialist. This shall happen within one month of receipt of the response and the case reviewed by the Specialist. The complainant shall be informed about the appeal process and notified that response to the appeal shall be final; however, the complainant is at liberty to pursue the matter legally if s/he is still unsatisfied with the decision.

5. IMPLEMENTATION AND AWARENESS CREATION

Awareness creation is a critical part of implementation of the GRM under the IFPA-CD project. Stakeholders need to be informed about the existence of the GRM, its structures and how it operates including mechanisms for channeling grievances. Information, Education and Communication (IEC) materials shall be developed to disseminate information to various stakeholders so that they are provided with information they require on GRC mandate, objectives and operational principles for effective delivery of their functions.

5.1 Disclosure of the GRM

The GRM for the IFPA-CD project will be disclosed in the project area as well as the MWE's website and on the World Bank website. Information leaflets and brochures about the GRM shall be presented during project related meetings and public consultations. Training of GRCs shall be undertaken as well as awareness raising within the project area. During these gatherings, it shall be emphasized that the GRM is aimed at quick and amicable resolution of complaints and does not substitute the legal process established under national legislation.

Various avenues (including radio talk shows and awareness campaigns shall be used to ensure people are made aware of the availability of the GRM, steps of grievance resolution as well as contacts and locations of focal persons to be approached in case of any grievance.

Various stakeholders including civil society, NGOs are considered as key actors of the GRM and play a crucial role in disseminating the information on GRM and facilitating quick and amicable resolution of complaints. The GRC District Focal Persons shall coordinate information dissemination activities in collaboration with the Social Safeguards Specialist of the Project Coordination Unit as well as Safeguards Focal Points in UWA and NFA on GRM and ensure that the posters providing details on GRM and contacts of grievance focal points are posted in publicly accessible and visible places such as trading centers, market, places of worship and health centers and in every affected community.

5.2 Setting up GRM structures

Establishing the GRCs shall be done formally with a letter of assignment by the appointing authorities at the various levels. Terms of Reference shall be shared with them as well as the various tools including complaints registers (Annex I, Complaints log (Annex II) and reporting templates (Annex III, IV and V).

Inducting of GRC members will be undertaken to ensure awareness on GRM and knowledge of appropriate procedures and steps for managing grievances. The DESSS will take lead in training National and District level GRCs. The District GRCs will train the Sub county GRCs with supervision from the National GRC. The Sub County CDO will take lead in forming and training the village level GRCs with support from the Sub county GRC members. The handouts on GRM will be developed from time to time and distributed among the various categories of project stakeholders and in the communities in the project area.

5.3 Grievance prevention

Grievance prevention is key and shall form part of the GRM implementation. The following measures shall be put in place to prevent grievances from occurring;

- a. Identify risk areas that are likely to cause grievances and possible mitigation measures.
- b. Provide sufficient and timely information to the community and other stakeholders. Many complaints arise as a result of lack of information or insufficient information. Therefore, providing accurate and adequate information about the project and its activities and implementation schedule shall be done regularly. Avenues for information dissemination shall be in form of radio talk shows, Information and Education Materials, and trainings.
- c. Conduct meaningful community and stakeholder engagements. Throughout the project implementation, the project shall continue sharing information, progress reports, providing opportunity to community members to raise their concerns, responding to their issues in a timely manner, as well as receiving feedback on interventions.
- d. Build capacity for the project staff. The project staff shall be equipped with information about the project such as project design, project activity implementation schedules, and institutional arrangements. They shall also have basic skills like effective communication, community dynamics, negotiation and conflict resolution. Building trust and maintaining good rapport by providing information on the project and responding to community needs will help solve issues before they become grievances.

5.4 Logging complaints

Locally available appropriate communication channels shall be established for logging complaints. Grievances shall be received through several ways ranging from formal verbal (including telephone) or written format. These could be from project affected persons, farmer groups, institutions and any other third parties. The aggrieved persons will contact the GRC members (preferably the secretary) either on phone or physically. The complaint will be registered in the grievance registration form (annex 1), and any supporting information shall be submitted within 48 hours. The GRC will convene a meeting to sort the grievances received within 7 days. For grievance that fall within the mandate of the GRC, a resolution shall be made or it shall be referred to the next level in case it cannot be handled at that level. Those that are outside the mandate of the GRC, it shall be referred to the respective institution. The village level GRC will give feed back to the complainant on the resolution. In the case of referrals, the GRC will have a minimum role to play other than referring the complainant to the respective institution. All complaints shall be registered in the grievance register and Complaints Logbook (Annex 2) by the GRC regardless of how they were received.

5.5 Options for settling complaints

The GRCs may use the following options to settle grievances

1. Document agreed actions; the complainant shall be given the resolution by the GRC in writing. This will give confidence to the complainant that issue raised was handled. The complainant will then decide on the next action especially if s/he is not satisfied with the resolution. A copy of the resolution shall also be kept by the secretary to the GRC for future reference.

2. Caution; The GRC may resolve to caution the project staff involved in the grievance. This may be done in the presence of the complainant.
3. Apology; The concerned project staff might be required to apologize to the complainant, preferably in writing.
4. Restitution/ restoration; in case of damage to the property of the complainant, there shall be restitution or restoration to the damaged property.
5. Giving information; sometimes grievances arise from lack of information or misinformation about the project. The GRC will give such missing information to the complainant.
6. Referral to the next level; where the grievance cannot be handled at the respective level, it will be referred to the next level. This decision will be given to the complainant within the stipulated time.
7. Determining reasonable compensation; where compensation is to be done, it shall be reasonable and in accordance with the laws of Uganda.

5.6 Track, document, evaluate and report results

The GRCs have a responsibility of tracking and monitoring the process of grievance redress and the implementation of the decisions made. They also have a duty to give regular feedback to the complainants about the grievance redress process (using Annex III). Evaluation procedures will also be put in place to assess the overall effectiveness of GRMs.

5.7 Timelines for grievance handling

Prompt handling of complaints is encouraged as they are received, and or addressed and records shall be kept. Where possible, complaints shall be handled instantly especially in cases where complaints are logged in through walk-ins and the toll free option. However, in cases where complaints have been logged through written format i.e. suggestion boxes or complaint logs, periodic analyses shall be undertaken and the corresponding timelines are elaborated below.

1. The village GRC will interrogate the complainant in the language conversant by the complainant and complete a Grievance Registration Form which will be signed by the chairperson of the GRC and the complainant. This will then be logged in the grievance log/register provided. The complainant shall expect a response from the GRC within **seven (7) days** of filing the complaint. If the issue is not resolved, the GRC will forward the complaint to the GRC at the Sub- County;
2. The GRC at the Sub-county will be given a **fourteen (14) day** notice to hold a meeting. Two days after the meeting, the sub-county GRC may call the complainant and village GRC for discussions and resolution. The resolution will be presented to the complainant in written form within the same day of the meeting. If there is no resolution to the grievance, the GRC at the Sub County shall then refer the matter to the GRC at the District
3. The GRC at the District will be given a **fourteen (14) day** notice to hold a meeting. Two days after the meeting, the GRC will call the complaint and Sub county GRC for discussions and resolution. The resolution will be presented to the complainant in written form within the same day of the meeting;
4. If there is no resolution to the grievance, the GRC at the district shall then refer the matter either to the National level GRC

5.8 Referral system

The Ugandan laws allow any aggrieved person the right to access justice through systematic administrative and judicial system. If the complainant remains dissatisfied with any of the structured levels of the grievance mechanism, he or she has a right of appeal to any legal authority.

In case of any referrals, the committee will receive a complaint, record it and provide written referrals within **fourteen (14) days** to the next level of structure. Copies of these referrals shall be kept in record file. Effort shall be made to follow-up on how the resolution of the project related complaints referred are being handled.

5.9 Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment(SH), and Sexual Violence Against Children (SVAC) Complaints

Gender based violence is a very sensitive aspect of conflicts in communities and families; and where it occurs, it leads to stigma to the affected persons/victims and families. This requires ethical and confidentiality to effectively support victims and affected families. It is therefore important that people both inside and outside the project operations have appropriate channels through which they can report GBV/ SEA, including options to report anonymously. GBV issues integrated into this GRM will require a specialized approach considering needed ethics, sensitivity, and confidentiality. Consequently, this GRM requires to adopt specified persons within the GRCs to create confidentiality and ease stigma when dealing with GBV issues. For this purpose, each GRC will select from the very start two people (female and male representative) among them to form a GBV complaints team that will attend to the project related GBV/SEA/SH/SVAC issues. In addition, Contractors will be required to sign a document (Code of Conduct) that clearly states the rules as regards to the vulnerable groups in the area. Further guidance on dealing with GBV grievances will also be provided by the Ministry of Gender, Labor and Social Development (MoGLSD) and/or the Departments of District Community Based Services of the respective District Local Governments.

a) GBV Referral Paths

Depending on the kind of abuse the following are the complaint referral paths:

- i) For all cases relating to physical assault without significant injuries, verbal/emotional abuse; will be reported to Village GRCs to initiate mediation. Failure to agree or the perpetrator is a repeat offender, a written referral will be made to police.
- ii) Report to Police - All capital offences including deaths, rape and defilement
- iii) Report to Medical/Health Practitioners for victims/survivors in critical conditions before reporting to police or other law and order institutions.
- iv) Report to Psycho - Social Service Providers (District Community Development Office, Legal Aid Clinics, relevant CSOs/CBOs). Victims also have an option of reporting directly to these community institutions.
- v) Report to the Magistrates Court - In adverse/extreme circumstances, even after having taken the above paths, the victim can report the matter to the magistrate's courts.

The training of GRCs will consider the need for a GBV/SEA specialist among the facilitators to ensure the delegated members (female and male representatives) on the committees responsible for dealing with GBV victims/survivors in any complaint are equipped with the necessary skills for purposes of sensitivity, confidentiality and ethics required in

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these cases. The IFPA-CD Project's GRM incorporates clear information on how feedback, concerns and grievances can be submitted by any Project Affected Person (PAP)/stakeholder, as well as highlighting the varied ways of submitting a complaint. It also provides information on the way the GRM committees work, both in terms of process and deadlines.

b) Handling GBV/SEA Complaints

The role of the GBV complaints team, among other duties as GRC members, will be to receive GBV complaints, handle them with the sensitivity and confidentiality they deserve; and refer them to appropriate referral paths such as Service Providers and/or Police as the case may be. Possible channels that function as part of the two grievance mechanisms could include:

- For workers: independent helplines, an email address or whistleblowing line, health and safety committees. It is important that these channels provide anonymity for the aggrieved persons.
- For service users or community members: feedback boxes, telephone numbers, a designated community organization, or local women's organization. Reporting channels need to include anonymous options.

The GRM aims to support GBV/ SEA victims by referring them to GBV/ SEA Services Provider (which can be a local/national NGO already working with GBV/ SEA) for support immediately after the GBV complaints team has received a complaint from a victim. Support options include:

- i) Protective homes for GBV victims/survivors,
- ii) 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.
- iii) Psychological support for victims and witnesses, which may need to include trauma counseling for victims of sexual violence or harassment,
- iv) Legal advice for victims, whistleblowers, witnesses, and alleged perpetrators,
- v) Measures that support reintegration into the workforce (e.g., counseling), and
- vi) Child-protection support services and/or expertise for reports involving children.

There are three key actors involved in handling GBV/ SEA complaints: (i) GRM system, (ii) GBV/ SEA Services Provider, and (iii) representative of NFA/UWA or MoWE. It is therefore essential that prior to GBV/ SEA complaints being received, it is clear who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, appropriate action to be applied to the perpetrator and verifying that the victim has received support.

While the process for grievance resolution and people involved may vary, the key guiding principle for resolution should be to ensure complete confidentiality of the victim, a victim centered approach and speedy resolution. The process for addressing complaints should entail:

- The GBV complaints team will keep GBV/ SEA allegation reports confidential and, unless the complaint was received through the GBV/ SEA Services Provider or other identified reporting channels, refer the victim immediately to the GBV Services Provider.
- If a case is first received by the GBV/ SEA Services Provider or through other identified reporting channels, the report will be sent to the GBV/ SEA Complaints team to ensure it is recorded in the system.
- The GBV/ SEA Services Provider provides the necessary support to the victim until it is no longer needed

c) Resolving and closing a GBV/SEA case

There are two elements related to resolving and closing a GBV/ SEA case:

- The internal project system, in which the case is referred to the GBV/ SEA Services Provider for victim support, and through the established GBV/ SEA resolution mechanism appropriate actions are taken against perpetrators, and
- The support that the victim receives from the GBV/ SEA Services Provider.

When a complaint is received, it should be registered in the project GRM and referred to the GBV Complaints Team with the consent of the complainant. The GBV/ SEA Complaints Team will initiate accountability proceeding (with the victim's consent), as follows:

- If the victim does not wish to place an official complaint with the project, the complaint is closed.
- When the victim proceeds with the complaint, the case is reviewed through the established GBV/ SEA resolution mechanism and a course of action is agreed upon.

A process to resolve GBV/ SEA complaints is shown in the figure below.

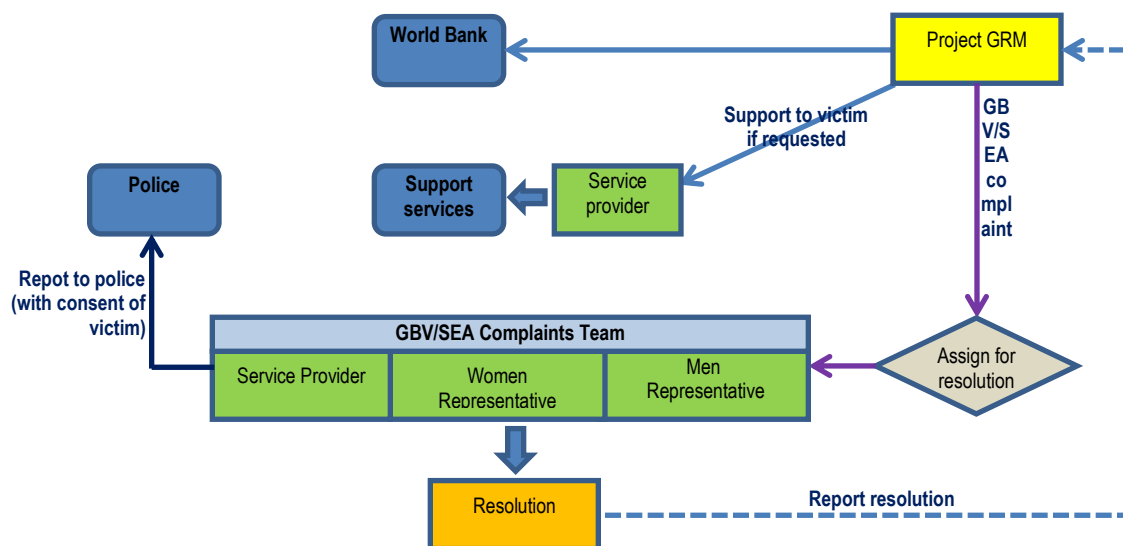


Figure 1: Process of resolving GBV/ SEA complaints

5.10 Monitoring and reporting in GRM

Grievances shall be captured for monitoring and reporting using the Grievance Registration Form, logbooks and reporting templates (annex III, IV, V and VI). The Grievance Registration Form (Annex I) shall be filled for each grievance case (relevant to the project) by GRM parties at District, Sub-County and village level where the grievance was logged.

The District Focal Persons will coordinate GRM activities with members of GRC at district, Sub-county, and village levels on a weekly basis to update GRC's database.

The District Focal Person (DFP) will coordinate the monitoring process. The DFPs will provide monthly reports on the status of handling and management of grievances within their respective districts. The respective reports will reflect a consolidated picture of the status of grievance handling at the district.

6. ANNEXES

ANNEX I: PROJECT GRIEVANCE REGISTRATION FORM

Grievance and Resolution Form

Name (Filer of Complainant): _____
 ID Number (PAP's ID Number): _____
 Contact Information (mobile number): _____
 Nature of Grievance or Complaint Submitted: _____

<u>Date</u>	<u>Individuals Contacted</u>	<u>Summary of Discussion</u>
_____	_____	_____

Signature: _____
 Signed (Filer of Complaint): _____
 Name of Person Filing Complaint (if different from Filer): _____
 Position or Relationship to Filer: _____

Review/Resolution

Date of Mediation Session: _____
 Was filer present? YES NO
 Was field Verification of complaint conducted? YES NO
 Findings of Field Investigation: _____

<u>Summary of Conciliation/Mediation</u>	<u>Summary Discussion</u>
Issues: _____	_____
Was agreement reached on issues? YES NO	_____
If agreement was reached, detail of agreement below:	_____
If agreement was not reached, specify points of disagreement below:	_____
_____	_____
_____	_____

Signed (Conciliator): _____ Signed (Filer): _____

Signed (Independent Observer): _____

Date: _____

6.2 ANNEX II. COMPLAINTS LOG

Location (District):.....

Sub County:.....

Village:.....

Ref No.	Date Received	Mode of Receipt	Name of Complainant	Contacts of Complainant	Description of Complaint	Action Taken

Notes

1. **Reference Number:** a unique number assigned to the complaint for easy tracking and follow up
2. **Mode of receipt:** how the complaint was received. This could be by Telephone, "SMS", Email, Written, In Person, verbal
3. **Contact of complainant:** to include phone number, P.O. Box number, e-mail
4. **Description of complaint:** a brief description of the complaint received, could include; fraud, land disputes, compensation, environment and social management issues service delivery, facilities, management etc
5. **Action taken:** includes remedies, resolution, agreed upon actions to the satisfaction of the complainant

6.3 ANNEX III: VILLAGE LEVEL GRC REPORTING TEMPLATE

VILAGE LEVEL GRC REPORTING TEMPLATE

District.....

Sub-county.....

Village.....

Indicators

SN	Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
1.	No of grievances related to project activities logged per month												
2.	Number of grievances that received timely response (within 7 days)												
3.	Number of grievances received and addressed at village level												
4.	Number of recurrent complaints received (over a period of 15 days)												
5.	No. of meetings held												
6.	Number of unresolved grievances												
7.	Number of grievances referred from village to sub-county level for addressing												
8.	Number of grievances referred to other legal institutions e.g. LCs, Police, Courts of Law												

Provide details on recurrent complaints raised (attach evidence where necessary)

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6.4 ANNEX IV: SUB-COUNTY GRC REPORTING TEMPLATE

District.....

Sub-county.....

Indicators

SN	Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
1.	No of grievances related to project activities logged per month												
2.	Number of grievances that received timely response (within 14 days)												
3.	Number of grievances received and addressed at sub county level												
4.	Number of recurrent complaints received (over a period of 15 days)												
5.	No. of meetings held												
6.	Number of unresolved grievances												
7.	Number of grievances referred from sub county to district level for addressing												
8.	Number of grievances referred to other legal institutions e.g. LCs, Police, Courts of Law												

Provide details on recurrent complaints raised (attach evidence where necessary)

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6.5 ANNEX V: DISTRICT GRC REPORTING TEMPLATE

District

Indicators

SN	Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
1.	No. of grievances related to project activities logged per month												
2.	Number of grievances that received timely response (within 14 days)												
3.	Number of grievances received and addressed at district level												
4.	Number of recurrent complaints received (over a period of 15 days)												
5.	No. of meetings held												
6.	Number of unresolved grievances												
7.	Number of grievances referred from the district to national level for addressing												
8.	Number of grievances referred to other legal institutions e.g. LCs, Police, Courts of Law												

Provide details on recurrent complaints raised (attach evidence where necessary)

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6.5 ANNEX VI: NATIONAL LEVEL GRC REPORTING TEMPLATE

Indicators

SN	Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
1.	No. of grievances related to project activities logged per month												
2.	Number of grievances that received timely response (within 14 days)												
3.	Number of grievances received and addressed at district level												
4.	Number of recurrent complaints received (over a period of 15 days)												
5.	No. of meetings held												
6.	Number of unresolved grievances												
7.	Number of grievances referred from the district to national level for addressing												
8.	Number of grievances referred to other legal institutions e.g. LCs, Police, Courts of Law												

Provide details on recurrent complaints raised (attach evidence where necessary)

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