

WORKING GRIEVANCE REDRESS MECHANISM FOR THE GROW PROJECT.

GRIEVANCE REDRESS MECHANISM

What is a Grievance?

Under GROW, a grievance is defined as a complaint, an issue, concern, problem, dispute or claim (perceived or actual) that an individual, community, group or institution wants project proponents (in this case MGLSD and PSFU), contractors, service providers to address, redress or resolve at any time of the project implementation until one year after project or a sub-project closer.

What is a Grievance Redress Mechanism?

A Grievance Redress Mechanism (GRM) is a system or set of structures, procedures or processes by which complaints, queries or clarifications about a project are reported, received, attended to and feedback provided. One of the components of the GRM is the Grievances Redress Committee (GRC) which comprises individuals with the specific task of analyzing grievances to provide a solution or recommend a referral.

The World Bank ESF, ESS 10 requires that concerns and grievances of project-affected parties related to the environmental and social performance should be addressed and responded to by the developer/project proponent in a timely manner. Additionally, ESS 7 emphasizes that grievance mechanism should be culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.

The GROW Project GRM

Principles of the GROW Project GRM

- a. **Appropriateness and Proportionality:** It should be proportional to the level of environmental and social risk and the expected number and complexity of grievances or complaints about the project
- b. **Legitimacy and independence:** The mechanism should be clear, transparent, with sufficiently independent governance structures to ensure that there is no bias or interference and that the process can be conducted fairly with respect to all parties
- c. **Fairness and objectivity:** There should be no bias in discussing and resolving grievances
- d. **Simplicity and accessibility:** There should be an easy procedure for lodging grievances and the office for lodging grievances should be accessible.
- e. **Responsiveness, effectiveness and efficiency:** It should be quick to resolve grievances
- f. **Upholds the survivor centred approach (SCA):** GBV including SVAC survivors(complainants) should be supported to access the Minimum Package of Services (MPS)S delivered in accordance with principles of the SCA
- g. **Participation and inclusion:** Listen to the complainants, support the voiceless and marginalized to lodge grievances and consider their vulnerabilities in resolving such grievances

- h. **Non-Retaliation:** Complainants should not face any sanction or other negative consequences for lodging grievances.
- i. **Partnerships:** There should be well established working arrangements with different entities which are important for managing different types of grievances including complex and sensitive ones such as SEA and SH.

Objectives the GRM

- I. Receive and resolve project related grievances in the most effective and efficient manner
- II. Build trust between the project and the stakeholders including communities in general
- III. Provide feedback to project affected persons on resolution of their grievances.
- IV. Use grievances as feedback for improving project implementation arrangements

Scope of the GRM

The GRM will handle all complaints arising from the activities of the proposed Project as well as the losses and damages caused by technical/construction works, and any direct or indirect adverse environmental and social impacts. The GRM will be established prior to implementation and will remain operational for the duration of the project. The project will continue to strengthen and revise the Grievance Redress Mechanism (GRM) through the appropriate institutional structures for Project management at national, district and community levels.

Anticipated Grievances

Anticipated grievances include those related to:

- Grant and loan applications not selected for funding;
- Delayed disbursement of approved grant and loan funds;
- Cancellation of approved grants and loans;
- Grievances related to bank charges levied by PFIs;
- Applicants not selected for training or skilling;
- Workers of contractors not paying for goods and services supplied by community members;
- Poor pay and other unsatisfactory working conditions for workers employed by contractors;
- Community members not being employed by contractors;
- GBV and other related grievances triggered by economic empowerment of women;
- Sexual harassment as women seek to access project benefits;
- Sexual violence against children (SVAC) and other violations children's rights such as child labour; school absenteeism and school dropout;
- Grievances related to accidents and injuries;
- Damage to community infrastructure;
- Recent change of asset ownership;
- Crop damage;
- Family wrangles;
- Noise pollution;
- Waste Management;
- Wrongly recorded personal or community details;
- Wrongly recorded assets including land details and/or affected land area/crops;

- Recent change of asset ownership;
- Incorrect computation of compensation;
- Names missed out of RAP register, and
- Dissatisfaction with outcomes of GRM processes

Responsibility for Grievance Management

As is the case with stakeholder engagement, MGLSD PIU in collaboration with PSFU PIU supported by their safeguard's teams, will have overall strategic responsibility for management of grievances under the project. The MGLSD PIU Social Development Specialist supported by PSFU PIU Social Development Specialist will support other entities to put in place GRM structures.

The support will include training in grievance management. In execution of its responsibility, the MGLSD and PSFU PIU supported by their E & S teams will establish the overall program wide GRM for the GROW project prior to implementation of activities and, and prior to project effectiveness and thereafter maintain and operate the mechanism throughout Project implementation. The role of MGLSD and PSFU in grievance management will include supporting other entities that will take part in implementing GROW to establish GRMs. The GRM system at different levels will be established as part of preparation of the SEP. To the extent possible, existing systems and structures for managing grievances will be used for the same purpose under GROW. Orientation on management of GROW related grievances will however be done by MGLSD and PSFU PIU safeguards teams.

Tiers of GROW Project GRM

GROW project has diverse implementers each will have a role in grievance management. GROW project will therefore not have a single spine GRM. The Tiers of GROW Project GRM/GRC are as follows:

- i. **Tier 1:** This is the village level and comprises the LC 1 Executive as the GRC. Where necessary, it will co-opt other members when handling GROW related grievances. This level may address complaints such as non-criminal complaints of GBV that may be reported by a woman entrepreneur because of receiving funding from GROW. Others relate to grantee and loanee operations and the behavior of workers of contractors. Grievances at this level will be resolved within 15 working days of lodging the grievance and during this time frame, a written response will be given to the complainant. The complainant may appeal if not satisfied with the decision of the GRC.
- ii. **Tier 2:** This is at the Parish level. The Parish Development Committee (PDC) under the Parish Development Model (PDM) will be the GRC for GROW at this level. The PDC comprises the following members who shall be elected by communities in accordance with PDM guidelines:
 - LCII Chairperson – Chairperson (1)
 - Parish Chief-Secretary (1)
 - Members of the parish executives holding the following portfolios (6): Secretary for Production & Environment, Secretary for Information Representatives of the special interest group in the executive (Youth, PWD, Women)
 - CSOs, NGOs, CBOs (1)
 - Opinion Leaders (Male and Female) such as retired civil servants (2)
 - Business/Private Sector Representatives (1)
 - Chairpersons LC1 Per Parish (TBD)

This Tier will receive appeals from Tier 1 but may also be the GRC of first instance for lodging grievances. Grievances at this level will be resolved within 15 working days of lodging the grievance and during this time frame, a written response will be given to the complainant. The complainant may appeal if not satisfied with the decision of the GRC.

- iii. **Tier 3:** This is at the Subcounty Level. The GRC will be the technical team of public servants chaired by the Subcounty chief and the Community Development Officer performing the role of Focal Person for grievances and secretary to the GRC. It may co-opt other relevant community members when handling GROW related matters including grievances. This Tier will receive appeals from Tier 2 but may also be the GRC of first instance for lodging grievances. Grievances at this level will be resolved within 15 working days of lodging the grievance and during this time frame, a written response will be given to the complainant. The complainant may appeal if not satisfied with the decision of the GRC.
- iv. **Tier 4:** This is at the district level. The District Technical Planning Committee (DTPC) chaired by CAO will be Tier 4 GRC for GROW. The DCDO will be the Focal Person for grievances and secretary to the GRC. The Members of the DTPC include: the DCDO, District Health Officer, Labour Officer, Production Officer, Land Officer, Natural Resources Officer, Commercial Officer, Gender Officer, Probation and Welfare Officer, Culture Officer, and District Planner. This Tier will receive appeals from Tier 3 but may also be the GRC of first instance for lodging grievances. Grievances at this level will be resolved within 20 working days of lodging the grievance and during this time frame, a written response will be given to the complainant. The complainant may appeal to Tier 5 at MGLSD if not satisfied with the decision of the GRC.
- v. **Tier 5:** MGLSD and PSFU will establish a GRC at the national level (MGLSD). This will be the GRC of first instance for reporting grievances related to direct actions, inactions or decisions of project management structurers at MGLSD and PSFU PITs. Such grievances include grant award decisions under subcomponent 2 A, award of skilling contracts under sub component 1C. In addition, this tier will be the last referral point for all grievances initially handled at other levels before complainants choose to go to court if not satisfied with the decision of the MGLDF/PSFU GRC. MGLSD and PSFU Social Development Specialists will be the Focal Persons for grievances. The GRC will comprise:
 - a) MGLSD and PSFU PITs: Senior Technical members of MGLSD and PSFU PITs (Project Management Team) led by the National Project Coordinator (MGLSD), the Project Coordinator (PSFU) and comprising the Environmental Specialists, Social Development Specialists, Gender Specialists, Financial Management Specialists, Monitoring and Evaluation Specialists, Construction Engineer, Grants Specialists, Skills Development Specialists and Work Based Learning Specialists among others will constitute a GRC to receive and resolve grievances within the mandate of the PITs and refer others as appropriate . MGLSD and PSFU PITs will hold joint GRC meetings where necessary but may also convene separate meetings where the grievances specifically relate to the mandate of each entity (MGLSD or PSFU) and a joint meeting is not necessary. The MGLSD and PSFU PITs (GRC) will resolve grievances within 30 working days of lodging the grievance and within this time frame, written communication given to the complainant.

Complainants not satisfied with decisions of MGLSD and PSFU PITs (GRC) may appeal to the PTC.

- b) **The PTC:** The ToR for the PTC will include functioning as the GRC for the project. The PTC will be the GRC of first instance for some grievances but will also be a referral point for others such as those from MGLSD and PSFU PITs, PFIs, local governments, contractors, etc. The PTC will hold meetings as and when necessary to attend to grievances. It may form subcommittees that include technical officers from MGLSD and PSFU among other entities, for the purpose of assisting in resolving grievances. The PTC will resolve grievances within 30 working days of lodging the grievance and within this time frame, its decision will be communicated to the complainant by GROW Project Coordinator or Deputy Project Coordinator (PSFU PIU) if the grievances relate to sub-components IC, 2B and 2C. Complainants not satisfied with decisions of the PTC may appeal to the PSC.
- c) **The PSC:** The ToR for the PSC will include functioning as the final GROW project GRC. It will attend to grievances on referral (by PTC) or appeal against decisions of the PTC by complainants. The PSC will hold meetings as and when necessary to attend to grievances. It may form subcommittees that include technical officers from MGLSD and PSFU among other entities, for the purpose of assisting in resolving grievances. The PSC will resolve grievances within 30 working days of lodging the grievance and within this time frame, its decisions will be communicated to the complainant by GROW Project Coordinator or Deputy Project Coordinator (PSFU PIU) if they relate to sub components IC,2B and 2C. Complainants not satisfied with decisions of the PSC may seek legal redress through courts of law.

Other Entities to Establish GRMs/GRCs

Other entities that will participate in GROW implementation will also establish structures (GRMs/GRCs) for receiving and resolving grievances related to their GROW project funded operations. The principle is that, to the extent possible, the entity whose, actions, inactions or decisions triggered the grievance, should be given the first opportunity to resolve the grievance. The tier 1-5 GRM system should come into play only when the issue is beyond the capacity or mandate of the entity GRM or the complainant is not satisfied with the decision of the entity GRM. This saves time lost in managing simple grievances and promotes harmony between the entity and the community or stakeholders. Principle of appropriateness and proportionality will be followed in establishing the GRMs/GRCs. To the extent possible, existing structures or offices of the entity should serve as the GRM/GRC.

a) Makerere University Business School

Expected GRM/ GRC level of first instance¹⁴ for grievances related to MUBS responsibilities in executing tasks under subcomponent 1B. The GRM/GRC will be put in place or elaborated before executing the assigned tasks. Grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainants not satisfied with the decision of the GRC, may appeal to one of the tiers, 1-4 as appropriate (the course will be held in the community- or as close as possible to the women entrepreneurs). The grievance may be escalated to Tier 5 as part of the appeal or referral process. For different reasons, complainants may choose another level of the GRM/GRC for reporting grievances.

b) Participating Financial Intermediaries (PFIs)

Expected GRM/C level of first instance for grievances about PFIs actions, inactions or decisions related to subcomponents 2B and 2C. The GRM/GRC, which will be part of the PFI ESMS will be put in place before inviting applications for loans and grants by PFIs. Grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainants including refugee complainants not satisfied with the decision of the PFI GRC may appeal to tier 5 GRM at MGLSD. The PFI GRC may also refer the grievance to Tier 5.

c) Providers of Trade /Sector Specific Skilling

Institutions to provide sector /trade specific skills under sub component 1D (work placement initiative) will also put in place GRMs/GRCs as points of first instance for lodging grievances about the skilling by beneficiaries and other parties who may be adversely affected by the skilling activities. Grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainant not satisfied with the decision of the GRM/GRC may appeal to tier 1-4 as appropriate or as advised by the Institution or any other party. The Institutions may also refer the grievance to Tiers 1- 4 as appropriate. The grievance may be escalated to Tier 5 as part of the appeal or referral process.

d) Hosting Organizations for Work Based Learning

Hosting Organizations under sub-component 1 D will put in place GRMs/GRCs to be the point of first instance for lodging grievances. Grievances may be about or by beneficiaries of the Work Based Learning Programme. The GRM/GRC will be part of the criteria for selecting hosting organizations by MGLSD with PSFU technical support. This may include the procedure for reporting and managing sexual harassment grievances. Grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainant not satisfied with the decision of the GRM/GRC may appeal to tier 1-4 as appropriate or as advised by the Hosting Organization or any other party. The Hosting organization may also refer the grievance to Tiers 1- 4 as appropriate. The grievance may be escalated to Tier 5 as part of the appeal or referral process.

e) Grantees and Loanees

Expected GRM/C level of first instance for grievances related to their sub project activities as they implement them. The GRM/GRC will be put in place before signing the agreement for loans and grants with PFIs or MGLSD. Grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainant not satisfied with the decision of the GRC may appeal to tier 1-4 as appropriate or as advised by the grantee, loanee or any other party. Grantees and loanees may also refer the grievance to Tiers 1- 4 as appropriate. The grievance may be escalated to Tier 5 as part of the appeal or referral process.

f) Refugee Hosting Districts (RHD) and Refugee Resettlements

Existing Structures shall be used in management of grievances related to GROW project. The 15 Refugee Hosting districts (RHD) will be managed through existing GRM structures in Refugee Resettlements or the host community or district as explained below.

All GROW project related grievances outside the Refugee Resettlement, will be managed through the Host District GRM, tiers 1- 4 as appropriate (see above) with possible escalation to tier 5 through referral or appeal. The management of project related grievances where a refugee is the complainant or the one being complained about, will be managed in consultation with the relevant Refugee Resettlement Commandant (refugees are allowed to take part in various activities such as employment and business outside of the Refugee Resettlement).

Where grievances related to GROW funded activities of refugee women entrepreneurs are localized within the Refugee Resettlement, existing mechanisms within the Refugee Resettlement, namely, the Refugee Welfare Committee (RWC) will be used to address the grievances. This Committees already handle issues such as non-criminal GBV by or against refugees within Refugee Resettlement.

Composition of the Refugee Welfare Committee: The 11-member RWC is constituted through an election and comprises:

- a) A Chairperson
- b) Vice Chairperson (Woman)
- c) General Secretary
- d) Publicity
- e) Women Affairs
- f) Health
- g) Education
- h) Production
- i) Security
- j) Youth
- k) Persons with Special Needs (PSN) such as PWD

Tiers of the RWC:

The RWC has three tiers, 1-3. Issues that cannot be handed at tier 1 are escalated to tier 2 and those that cannot be handled at tier 2 are rescaled to tier 3. Those that cannot be handed at tier 3 will be escalated to the Refugee Department of OPM.

Time Frame for Resolving Grievances by RWCs and OPM.

At tiers 1-3 of the RWC, GROW related grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainant not satisfied with the decision of any level of the RWC (GRC) may appeal to the next level RWC (GRC).

At OPM level, grievances will be resolved within 30 working days of being lodged and a written response given to the complainant within this time frame. At all levels of the RWC, consultation with relevant MDAs including local government departments will be undertaken in resolving grievances as is the case with other issues handed by RWCs. UNHCR will also be consulted, especially by OPM, where necessary.

Referral to MGLSD-PSFU GRM/GRC will occur if complainants are not satisfied with the decision of the OPM Refugee Department may appeal to MGLSD-PSFU GRM/GRC. Grievances on referral or appeal from OPM, will be resolved within 30 working days of being lodged and a written response given to the complainant within this time frame. Complainant not satisfied with the decision of MGLSD -PSFU GRM/GRC may seek legal redress through courts of law.

RWCs will be oriented on GROW including environmental and social risks and impacts associated with the project, potential grievances and the mitigation measures. The orientation will be done by MGLSD and PSFU PIT Social Safeguards teams at the commencement of GROW project.

g) Contractors

Contractors such as those who will be engaged for works under component 3 will put in place a mechanism for managing workers' grievances and grievances of other stakeholders related to their activities such as damage to community infrastructure. This is expected to be the GRM of first instance for reporting and managing such grievances. The GRM will be put in place before contract commencement. The workers Committee (GRM/GRC) which will be separate from the community GRM will be put in place as soon as workers report to site (election of members of Workers' GRC). The structure and procedures of the workers' GRM will however be elaborated in the Contractor's Labour Management Plan to be approved by MGLSD/PSFU and World Bank before commencement of works.

Grievances will be resolved within 15 working days of being lodged and a written response given to the complainant within this time frame. Complainants not satisfied with the decision of the Contractor's GRC may appeal to the District GRM/GRC, Tiers 1-4 as appropriate or as advised by the Contractor or any other party. The grievance may ultimately be escalated to Tier 5 as part of the appeal or referral process.

The Grievance Value Chain

At each GRM/GRC tier or entity, the management of grievances will be a two-stage process.

a) The first stage will involve the following main steps:

- i. Uptake of grievances;
- ii. Screening of grievances; and
- iii. The GRC Hearing Procedure.

b) The second stage will involve the following steps:

- i. Implementing the agreed actions to resolve the grievance
- ii. Closure of grievances;
- iii. Grievance monitoring data base; and
- iv. Feedback to complainants and other stakeholders

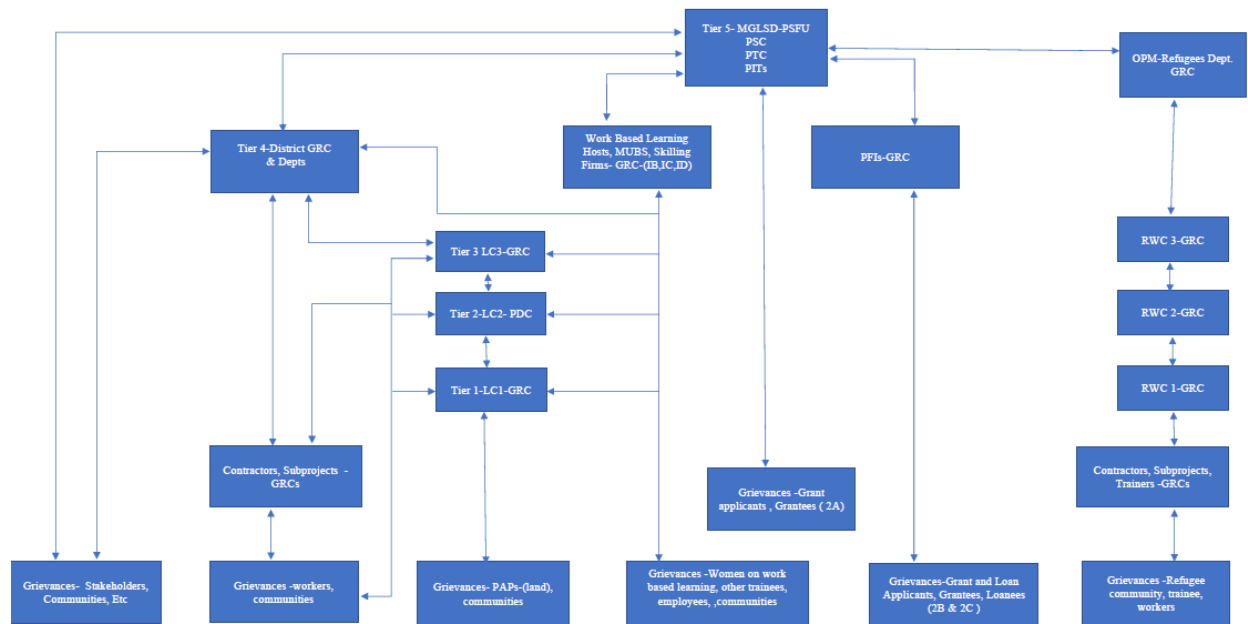
The steps above are detailed below.

Uptake of Grievances

Any aggrieved party may lodge a grievance or complaint. The Focal Person will receive grievances and complaints by email, telephone, letter, WhatsApp or walk in and assess them to determine if they are related to GROW and within the mandate of the GRC/GRC tier or Entity. Grievances not related to GROW will not be received but guidance will be provided to “complainants”. For written grievances, the complainant who can read and write will complete a grievance registration form (See Annex 1) that will be available at designated places or offices, sites at community (village or parish), sub-county, district and national levels, district land offices, Project/MGLSD website(s), and in implementing entities offices.

The Grievance Officer/Focal Person for grievances will review the received grievances and record them in a Grievance Register. To simplify the process of lodging a grievance, a variety of grievance log-in-channels will be used, such as a dedicated phone number, websites, e-mails, in-person, anonymous, suggestion box, among others. A copy of the logged grievance will be signed by aggrieved person and the Grievance Officer/Focal Person for Grievances.

Figure 3: Uptake and Referral of Grievances under Grow Project



Grievance Screening

All grievances will be screened by the Focal Person for Grievances for to ensure they are appropriately managed. This includes being channeled to the right offices. Some grievances may be resolved and responded to without a meeting of the GRC by the responsible action officers while others may need to be referred to other tiers of the GRM. Information needs for resolving grievances and the need to work with other partners in resolving different grievances will also be determined at this stage. The urgency of addressing different grievances will also be assessed.

This will determine which grievances will be attended to first, keeping in mind the maximum time frame for addressing all grievances received.

The Grievance Resolution Process

Once a grievance has been logged and screened, the GRC will be engaged to define a solution to the grievance. The GRC at all levels will be fair, objective, transparent and gender sensitive in resolving grievances. Retaliation of any kind against a complainant will not be tolerated. Where necessary, confidentiality will be observed especially when requested by the complainant even at the time of submitting a grievance or complaint to the Focal Person or any other entry point selected by the complainant. Anonymous grievances will therefore also be investigated by the GRC and appropriate action taken. Internal procedures of the GRC include but are not limited to reviewing reports and other relevant documents and interacting with the complainant and other parties who may assist the process of finding a solution. Where necessary, the GRC will consult with district officials and other Government Ministries, Department and Agencies (MDAs) to ensure a well-informed decision is made. For each grievance, the GRC will determine whether additional investigations are warranted. If so, additional information will be collected before the next GRC meeting.

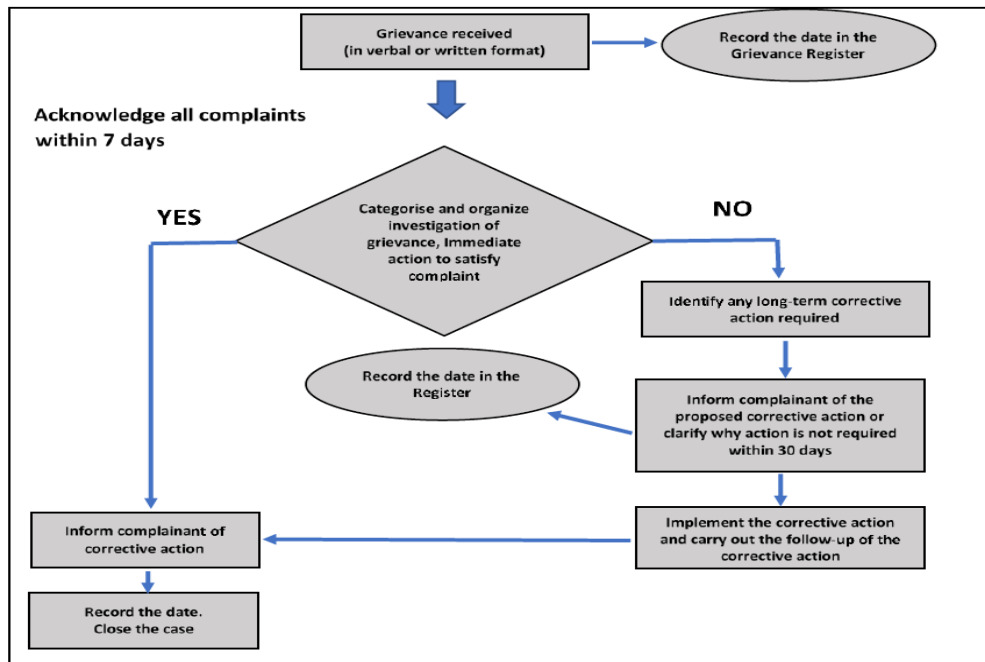
The GRC members prepare and sign the minutes on the meeting which include their actions for resolving the grievance. The GRC through the appropriate office will communicate the decision of the GRC to the complainant within the stipulated time frame upon receipt of the grievance (refer to GRM Tiers and Entity GRM/GRCs)

Implementation of the Agreed Actions

The solution to the grievance agreed with the complainant will be implemented. Some actions agreed on may require working with other partners, hence the need to build partnerships with state and non state actors as part of the strategy for managing project related environmental and social risks and adverse impacts. The time frame implementing the agreed actions will depend on the nature of the actions. This should however be done as soon as possible.

Closure of Grievances

A grievance will be considered “resolved” or “closed” when a resolution satisfactory to both parties has been reached and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project or project implementer and the complainant, the time needed to implement it will depend on the nature of the solution. Once the solution is being implemented or has been implemented to the satisfaction of the complainant, a complaint closure form will be signed by both parties and appropriately witnessed. It will (closure form) state that the complainant considers that his/her grievance is closed. The grievance will then be archived in the Project Grievance database. The Entity may however consider the grievance as closed if all the necessary procedures have been followed even when the complainant has not agreed but has not lodged an appeal. Grievances where an appeal has been lodged cannot be considered to be closed.



The Process Flow Chart of Grievance Redress Mechanism

Grievances of a Criminal Nature

Grievances of a criminal nature such as SEA will NOT be resolved by the project GRM at any tier or by any entity or implementer but referred to law enforcement agencies of Government such as police. In addition, non-criminal GBV related grievances will be managed in a manner that is consistent with principles of the survivor centred approach (SCA). The SCA also applies to referral of GBV cases of a criminal nature to providers of the minimum package of services (MPS) in the MGLSD GBV Referral pathway. Confidentiality (keeping name and identity of survivor confidential) and survivor self-determination are among the key pillars of the SCA. The MPS includes psychosocial support, medical care, safety/ and security and legal /justice for GBV survivors who on their own will, opt for legal redress. The District Probation and Welfare Officer will be engaged as soon as possible on issues related to violation of children’s rights including sexual violence against children (SVAC). The MGLSD and PSFU PIT Safeguard teams will ensure that all GRMS/GRCs are trained in the basics of the SCA as soon as the GRMs/GRCs are put in place.

Grievance Monitoring and Data Base

The Project GRM focal points at all levels will also be responsible for ensuring the GRM is monitored and reported on by all GROW implementers who have established GRM/GRCs. All implementers of GROW including grantees, loanees, contracts and Supervising Consultants where needed, in their monthly monitoring reports, will provide information on grievance management. Grievance monitoring and reporting will also be included in quarterly and annual reports. Indicators for this purpose will be agreed. MGLSD PIT Social Development Specialist and PSFU PIT Social Development Specialist will work hand in hand with the M & E Specialists at both PITs to ensure effective management of data on grievances. GROW project MIS at MGLSD will have a provision for a grievance database for keeping the record of all grievances. The database will contain the name of the individual or organization lodging a grievance (if

confidentiality was not requested by the complainant), the date and nature of the grievance, any follow-up actions taken, the solutions and corrective actions implemented by any relevant party, the outcome and how and when this decision was communicated to the complainant. Codes (not names) to be used for GBV survivors who are attended to including those referred to providers of the MPS.

Feedback to complainants and other stakeholders.

This will involve the users of the GRM and the public at large being informed about the results of investigations and the actions taken on grievances. This will be done as part of ongoing stakeholder engagement using approaches stated in the stakeholder engagement plan (SEP), following the timelines also stated in the SEP.

Disclosure of the GRM by MGLSD and PSFU

During SE exercises or meetings organized in each project beneficiary areas at the start of implementation of the project, the Project Team (MGLSD and PSFU PIT Safeguards teams) working with various officials at different levels, will explain to stakeholders, the alternative ways of lodging grievances and resolving them. The GRM procedures will also be disclosed through the Project's website and will be advertised on billboards/posters in each district/sub-county offices, clearly visible to the public. Information material on GRM will also be made available at different locations in districts/sub-counties, Refugee Resettlements covered by the project. The GRM will be disclosed as early as possible, with reminders throughout the Project lifecycle. It will be disclosed in a culturally appropriate manner in English and other local languages in respective districts in a format that is understandable to all stakeholders, stating the following specific information:

- i. Anyone can raise complaints, grievances, concerns, ask questions or make comments or suggestions related to the Project;
- ii. Anyone can contact the GRM focal point using the GRM focal point's contact details provided;
- iii. The GRM focal point is responsible for receiving complaints, grievances, concerns, questions, comments, suggestions, and for responding to the person or generally via the Project's website on an anonymous basis;
- iv. The GRM focal point will confirm receipt of the complaint, grievance, concern, question, comment, suggestion, either providing a preliminary answer or confirming the expected, timing to provide an answer; and by using this grievance mechanism, the complaint, grievance, concern, question, comment, suggestion with respect to GROW Project will be received and every effort will be made to answer the complaint, grievance, concern, question, comment, suggestion and engage with the complainant to mitigate any complaint, grievance, concerns to the extent possible.

Local governments will also be advised on the GRM so that they can communicate the step-by step process to other project stakeholders.

Disclosure of GRM by Other Implementers

Other entities that will access GROW project funds to implement subprojects or other project activities will also disclose their GRMs/GRCs that will be used to manage grievances related to their subprojects or activities in the subproject or activity area of influence. They will do so as part stakeholder engagement during subproject/activity preparation and before subproject or activity implementation.

World Bank Grievance Redress System

Any Project Affected Person may submit complaints to existing project-level or community level grievance redress committees, through the various grievance redress mechanisms or the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project related issues. Project workers may also submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of World Bank's 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/projectsoperations/products-and-services/grievanceredressservice>. For information on how to submit complaints to the World Bank Inspection Panel, please visit; www.inspectionpanel.org.