The Republic of Uganda
MINISTRY OF GENDER, LABOUR, & SOCIAL DEVELOPMENT

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Grievance Redress Mechanism Handbook

Final Copy

Under

Generating Growth Opportunities & Productivity for Women Enterprises (GROW) Project (P176747)

Grow
Enterprises for Women

September 2025

LIST OF ACRONYMS

ACDO	Assistant Community Development Officer
CAO	Chief Administrative Officer
CBO	Community Based Organization
CDO	Community Development Officer
CSOs	Civil Society Organizations
DCDO	District Community Development Officer
ESS	Environment and Social Standard
GROW	Generating Growth Opportunities and Productivity for Women Enterprises
GROW-GRM	GROW Grievance Redress Mechanism
GROW-MIS	GROW Management Information System
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
ICT	Information and Communication Technology
IEC	Information, Education and Communication
IG	Inspectorate of Government
JLOS	Justice, Law and Order Sector
LC	Local Council
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MFI	Micro Finance Institution
MGLSD	Ministry of Gender, Labour and Social Development
MIS	Management Information System
NGO	Non-Governmental Organizations
OHS	Occupational Health and Safety
PAP	Project Affected Person
PCR	Physical Cultural Resources
PDO	Project development Objective
PIST	Project Implementation Steering Team
PITC	Project Implementation Technical Committee
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PSC	Project Steering Committee
PSFU	Private Sector Foundation Uganda
RWC	Refugee Welfare Committee
SAS	Senior Assistant Secretary
S/C	Sub County
SDS	Social Development Specialist
SEAH	Sexual Exploitation, Abuse and Harassment
SMS	Short Messaging Service
TC	Town Clerk
VAC	Violence against Children
WB	World Bank

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Definition of Terms.

Gender-Based Violence (GBV) is defined as any unlawful act perpetrated by a person against another person because of their gender that causes suffering on the part of the victim and results in, among others, physical, psychological and emotional harm and economic deprivation. GBV is a serious, sometimes life-threatening, human rights, health and protection issue that violates several universal human rights. The following are forms of GBV cases that may arise from implementation of sub-projects under GROW:

Sexual Violence includes acts like rape/sexual assault, sexual abuse of programme participants (beneficiaries and/or supervisors), sexual harassment, trafficking of women and girls and forced marriage and/or prostitution occurring within a beneficiary household.

Physical Violence involves acts such as hitting or beating (or battering, strangling, suffocating, throwing things at the victim), or any physical harm of programme participants, conducted by another beneficiary or a person in authority such as a committee member.

Economic Violence involves acts such as withholding or denial of access to resources, denying the beneficiary/participant independent decisions regarding benefitting from the programme and use of resources earned, whether from the programme or from participating in savings and loans initiatives, damaging property, and failure to comply with economic responsibilities.

Emotional and Psychological Violence, can take the form of provocation of the beneficiary/participant in ways that are likely to invoke an emotional reaction that can lead to other forms of GBV (e.g., physical violence) or personal harm and includes intimidation and threats, usually by persons in authority and/or non-participating community members directed at participants/beneficiaries, such as verbal abuse and psychological abuse.

Verbal Abuse, refers to the use of insulting or disrespectful language with the intention of undermining the beneficiaries/participants, defamation, or harassment.

Psychological Abuse, can include the manipulation and isolation of the beneficiaries/participants, setting the victim up so they are over-dependent on the abuser – such as threatening to remove the victim from benefitting from GROW, deprivation of liberty, or denial of access to services.

Violence Against Women and Girls (VAWG) is any act of gender-based violence that results in, or is likely to result in, physical, sexual, or psychological harm or suffering by women or girls, including threats of such acts, coercion, or the arbitrary deprivation of liberty, occurring in the implementation of GROW.

GROW ensures that women and men have equal access to and control over resources, benefits and decision-making at all stages. It supports gender mainstreaming using approaches and tools that encourage improved gender relations at the household level.

Foreword

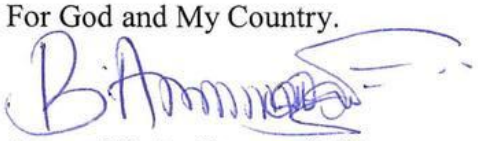
The Government of Uganda received financing from the International Development Association (IDA) of the World Bank for the implementation of the Generating Growth Opportunities and Productivity for Women Enterprises (GROW) Project. The Project is a nationwide initiative implemented in 135 Districts, 11 Cities, including Kampala Capital City Authority (KCCA), and 44 Municipalities. The Project Development Objective is to increase access to entrepreneurial services that enable female entrepreneurs to grow their businesses.

The GROW Project aims to support women entrepreneurs, enhance their productivity, and ensure they have access to the resources necessary for their businesses to thrive. The key objectives of the GROW Project include facilitating access to financial resources, training, and mentorship programs that enhance women's entrepreneurial skills and business acumen; supporting women-led enterprises to drive local economic development and create employment opportunities; improving the livelihoods of women and their families by promoting sustainable income-generating activities; and building the capacity of local communities to support women's economic initiatives and foster a culture of inclusivity and equality.

To enhance transparency, fairness, and accountability in all aspects of GROW Project implementation, a Grievance Redress Mechanism Handbook has been developed to establish clear pathways for managing concerns and feedback from the stakeholders under the project. This handbook serves as both a guide that ensures every grievance is addressed promptly, impartially, and with the utmost commitment to justice and confidentiality where necessary. This document results from collaborative efforts among experts, practitioners, and representatives of our valued stakeholders. By establishing clear procedures for grievance redress, the GROW Project upholds the rights of women entrepreneurs and reinforces the trust that is indispensable between the Project and its intended beneficiaries.

I extend my sincere gratitude to all who contributed their insights and expertise to the formulation of this handbook. Your dedication is a testament to our shared vision; a vision where issues under the GROW Project are resolved constructively, leading to an environment where every complaint or concern is transformed into an opportunity for learning and systemic improvement of the Project implementation. As you engage with this handbook, I encourage each beneficiary, stakeholder, and partner to actively participate in this grievance redress process. Together, we will foster a culture of continuous improvement, ensuring that our strategies remain responsive to emerging challenges and that our commitment to achieving the Project Development Objective. Together, let us move forward united, building a legacy of empowerment, innovation, and equitable growth for all women entrepreneurs.

For God and My Country.



Amongi Betty Ongom (MP)
Minister of Gender, Labour and Social Development

Preface

The Government of Uganda received financing from the International Development Association of the World Bank towards the implementation of the Generating Growth Opportunities and Productivity for Women Enterprises (GROW) Project. The Project Development Objective is to increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises. GROW Project is a nationwide project that is implemented in 135 Districts, 11 Cities, including Kampala Capital City Authority(KCCA) and 44 Municipalities and is therefore implemented under the Local Governments (as amended) Act, 2015.

Given its nationwide scope, the project is receiving varied feedback from the community. It is, however, the responsibility of the project to handle and manage the feedback received to ensure the satisfaction of the complainants. Therefore, the Ministry has developed a Grievance Redress Mechanism (GRM) handbook to offer a transparent structure for reporting and managing grievances. The GRM Handbook provides a structured approach to addressing grievances and ensuring that the voices of all stakeholders, including the Vulnerable and Marginalised Groups, are heard and respected. This mechanism not only enhances project accountability but also strengthens community trust and collaboration, which are essential for the success and sustainability of the GROW Project. This handbook has been developed through extensive consultations with community members, government agencies, development partners, and other stakeholders. Their valuable insights and contributions have shaped a robust and comprehensive grievance redress framework that is sensitive and responsive to the needs and contexts of women entrepreneurs.

This handbook outlines the principles, procedures, and responsibilities associated with the GRM, ensuring that all parties understand their roles and the steps involved in the grievance redress process. It is designed to be a comprehensive guide, providing clear and accessible information to all members of the community. As we implement the GROW Project, I urge all stakeholders to utilise this Grievance Redress Mechanism to ensure that the project remains responsive to the needs and aspirations of the communities we serve.

I extend my gratitude to all those who have contributed to the development of this handbook. Your dedication and collaborative spirit have been instrumental in creating a resource that upholds the highest standards of accountability and inclusivity within the Project.

For God and My Country



A.D. Kabenge

Permanent Secretary, Ministry of Gender, Labour and Social Development.

1.1. Project Background

Generating Growth Opportunities & Productivity for Women Enterprises (GROW) Project is a Government of Uganda project funded by the World Bank through a grant of USD 217 Million. *The Project Development Objective is "**to increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises in targeted locations, including in host and refugee districts**"*

The project has four components, namely:

Component 1: Support for Women Empowerment and Enterprise Development Services. This component has 3 subcomponents. Subcomponent 1A: Supporting creation and strengthening of women platforms, community mobilisation and mindset change, Subcomponent 1B: Support for core business development for micro and small enterprises, Subcomponent 1C: Support for trade/sector specific skills. Subcomponent 1D: Women's entrepreneurship work placement program.

Component 2: Access to Finance for Women Entrepreneurs. This component has 3 subcomponents namely, Subcomponent 2A: Grant support for micro-enterprises through business competition, Sub-component 2B: Facilitating access to performance grants for Women entrepreneurs, Subcomponent 2C: Sustainable and affordable loan products and processes for women entrepreneurs.

Component 3: Enabling Infrastructure and Facilities for Women Enterprise Growth and Transition. This component has 2 subcomponents namely, Subcomponent 3A: Multi-purpose service and production facilities to boost women's enterprise productivity, and Sub-component 3B: Enabling access to gender-inclusive workplace infrastructure.

Component 4: Program management support, policy innovation and evidence generation. This component has 2 subcomponents namely, Subcomponent 4A: Project management support for high-quality implementation, Subcomponent 4B: Policy innovation and evidence generation. The MGLSD is the overall coordinating ministry for the project in addition to being responsible for the implementation of subcomponents 1A, 1B, ID, 2D, 3A, 3B, 4A and 4B. The Private Sector Foundation Uganda (PSFU) is the implementing entity and will be responsible for implementing subcomponents 1C, 2B, 2C and part of 4A.

1.2. The GROW GRM[1]

The Project anticipates numerous grievances[2] for the different stakeholders and therefore needs to setup a standardized procedure for receiving, assessing, and addressing grievances. The main purpose of the GROW-GRM is to enhance project efficiency through a clear and transparent means of receiving, documenting and resolving complaints as well as providing feedback for reference and planning for improvement of the project.

Through the GROW-GRM, the project also creates awareness among beneficiary communities as a means of stakeholder engagement. The GRM framework also ensures that project-related complaints

[1] This GRM Handbook is designed to complement, not replace, other project documents, including the Project Operational Manual, component operational notes, and related manuals

[2] A grievance is a complaint, a concern, problem, disputes or claim (perceived or actual) of unfairness or dissatisfaction that an individual, community or group seeks the project, contractors'/service providers or project stakeholders to address at any time of the project implementation until one year after a sub-project or project closure

are resolved within a stipulated time frame, which is critical in managing social tension. The procedure outlines the method and/or process of submission, documentation, assessment, and resolution or redress of a grievance/complaint/issue/concern in a fair, just, reliable, prompt, transparent, and effective manner.

1.3. Guiding Principles for the GROW-GRM Design

The design of GROW-GRM is guided by the following principles:

- **Legitimate**: The mechanism must have clear, transparent, and independent governance structures to prevent bias or interference, ensuring fair conduct for all parties. It should be context-specific, trusted, and recognized by the community, and must include the participation of all key stakeholders.
- **Accessible**: Information about the mechanism should be widely publicized, providing multiple channels for submitting grievances, particularly for project-affected people, including specific groups such as children, women, and vulnerable and marginalized communities. Accessibility should consider language, literacy, awareness, financial constraints, distance, and protection against reprisal.
- **Responsive, Effective, and Efficient**: The mechanism should provide a clear and known procedure with time frames 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.
- **Equitable**: The mechanism must ensure that stakeholders have reasonable access to the necessary information, advice, and expertise to engage in the process on fair and equitable terms.
- **Transparent**: The mechanism should provide sufficient transparency of processes and outcomes to meet public interest concerns, with a presumption of transparency wherever possible.
- **Harmonization**: The mechanism should foster good collaboration and synergy within the project activities and with external stakeholders who run similar projects.
- **Engagement and Dialogue**: For an operational-level grievance mechanism, engaging regularly with affected stakeholder groups on the GRM's design and performance can ensure it meets their needs, is utilized in practice, and there is a shared interest in its success. Dialogue should be embraced as one of the best means of addressing and resolving grievances.
- **Continuous Learning**: The mechanism should identify lessons for improvement and prevention of future grievances and harms. Regular analysis of the frequency, patterns, and causes of grievances, strategies and processes used for resolution, and effectiveness should be provided to enable structures overseeing the GRM to improve performance and prevent future harm.
- **Process Simplicity**: The submission of grievances and suggestions should be simplified to encourage aggrieved/dissatisfied parties to share their grievances and trust the GRM structures in place.
- **Objective, Fair, and Independent**: The GRM should equally consider all grievances, irrespective of their nature, size, and complexity, without biases or prejudices.

- **Confidentiality and Responsiveness**: Confidentiality is integral to fairness. The identity and personal details of complainants should be disclosed only to those involved in the resolution of the grievance.
- **Linkage and Direct Referral**: For sensitive and unique cases of discrimination and exclusion, direct referral to Home-SREO Consulting should be established.
- **Upholds the Survivor-Centered Approach (SCA)**: Survivors of Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Sexual violence against children (SVAC), should be supported to access the Minimum Package of Services (MPS) delivered by the principles of the SCA.

1.4. Objectives of the GRM

The following are the specific objectives of GROW-GRM:

- Provide accessible, fair, prompt, transparent and accountable documented process for handling grievances
- To actively engage stakeholders, including vulnerable and marginalised groups in the grievance redress process
- To ensure compliance with the national and international standards.
- To use feedback to make continuous improvement to project implementation.
- To continuously monitor and evaluate the effectiveness of the GRM

1.5. Justification for a Robust GROW-GRM

In the absence of a formal Grievance Redress Mechanism (GRM), stakeholder concerns and complaints may remain unresolved, leading to pervasive dissatisfaction and frustration. This shortfall not only erodes trust and undermines the credibility of the project, but also creates a perception that the project is indifferent to the needs of those it impacts. Unresolved grievances can escalate into significant social tensions and conflicts within the community, disrupting project activities and weakening social cohesion. In extreme cases, such escalation may even manifest as hostility or violence, resulting in wasted time and resources, derailment of project benefits, and potential cost overruns.

Moreover, failure to address grievances can expose the project to legal challenges and regulatory non-compliance, particularly problematic for initiatives funded by institutions such as the World Bank. The ripple effects of unresolved issues can lead to stakeholders withdrawing their support or actively resisting the project. This disengagement not only delays implementation but also drives up costs and diminishes the overall financial performance of the project. Ultimately, not having a robust GRM in place can severely compromise the efficiency, sustainability, and success of a project. Establishing a comprehensive GRM is essential to ensuring that all stakeholder concerns are addressed promptly and equitably. A well-implemented GRM not only builds trust and enhances credibility but also fosters a cooperative environment that is vital for the project's long-term success.

Despite rigorous planning and execution, even the well-conceived projects can inadvertently have adverse impacts on individuals, groups, or the environment. Recognizing this, GROW-GRM has been established as a proactive mechanism designed to facilitate the early detection, thorough assessment,

precise documentation, and prompt resolution of grievances that may emerge both during and after project implementation.

The GROW-GRM provides a fair, legitimate, reliable, and cost-effective redress procedure to enable aggrieved/dissatisfied parties to present their grievances and achieve satisfactory resolutions/redress. This mechanism is crucial for promoting transparency and accountability for World Bank funded projects including the GROW project. Having a robust GROW-GRM in place ensures proper handling of project-related grievances, thereby enhancing the overall integrity and effectiveness of the project.

1.6. Preparation of the GROW GRM Handbook

The development of the GROW GRM Handbook was anchored in a participatory approach that emphasised inclusivity and collaboration. This process entailed a systematic review of pertinent literature including the Preliminary Grievance Redress Mechanism Handbook, the GROW Project documents, the GROW Environmental and Social Management Framework (ESMF), the GROW Vulnerable and Marginalised Groups Framework (VMGF), the Resettlement Process Framework (RPF), and Stakeholder Engagement Plan (SEP) coupled with extensive consultations with stakeholders such as Ministry of Finance Planning and Economic Development (MoFPED), District Local Governments (DLGs), and various other Departments and Agencies.

1.6.1. Potential Users of the GRM Handbook

The potential users of this GRM Handbook include; (i) GROW Project Beneficiaries; (ii) Contractors; (iii) District and Lower Local Governments; (iv) Project Implementation Unit; (v) Partnering Ministries, Departments and Agencies; (v) Consultants; (vi) Service Providers; (vii) Project related workers and; (viii) General Public.

1.7. Policy and Legal Requirements

The establishment of the GROW-GRM is hinged on several policy and legal instruments from both the Government of Uganda and the World Bank. Some of the instruments include, and are not limited to:

SN	Item	Description
1	International instruments	• International Covenant on Civil and Political Rights of 1966 • Conventionagainst Torture and Other Forms of Cruel, Inhuman or Degrading Treatment or Punishment 1984 (CAT) • Convention for the Elimination of Discrimination Against Women (CEDAW) • Convention on the Rights of a Child
2	World Bank Environment and Social Framework Standards	The GRM is structured to comply with the World Bank's Environment and Social Standards (ESS), which provide a robust framework for managing environmental and social risks throughout the project lifecycle. In particular, the GRM places a specific emphasis on ESS2 (Labour and Working Conditions), ESS7 (Indigenous Peoples), and ESS10 (Stakeholder Engagement and Information Disclosure) to ensure that these critical dimensions are rigorously addressed during project implementation.
3	Institutional Framework	The GRM is fully integrated within the existing institutional framework of the Ministry of Gender, Labour, and Social Development (MGLSD) to ensure stringent oversight and accountability. This integration extends to ancillary frameworks, such as the Social, Safety, and Health Safeguards Implementation Guidelines for Local Governments (2020), among others,

		thereby creating a comprehensive governance structure that supports effective grievance management at all levels
4	National Legislation	• The Constitution of the Republic of Uganda provides for the bill of rights under Chapter Four. Chapter four embodies the rights that are to be respected by all authorities, the state and individuals. It stipulates that no person shall be discriminated against on the basis of gender and that all persons shall be protected against any form of violence and that the project to be implemented without endangering human health and the environment. • In alignment with Uganda's national labour laws, the GRM ensures that any grievances related to labour issues are managed in strict accordance with legal standards. This compliance safeguards employee rights, ensures fair dispute resolution, and reinforces the project's commitment to maintaining best practices in labour management • Children Act Cap 59 • Domestic Violence Act 2010
5	National Policies	• National Gender Policy 2007 • National Policy on Elimination of Gender Based Violence, 2016 • The National Orphans and other Vulnerable Children's Policy 2004
6	National Strategy	• National Plan of Action for Sexual and Gender Based Violence and Violence Against Children 2019-2030
7	Access to Information Act , 2005	The Act operationalizes Article 41 of Uganda's Constitution, granting every citizen the right to access information held by public bodies. This legal right empowers project beneficiaries—especially women and marginalized groups, to demand transparency in project decisions, resource allocation, and grievance outcomes.
8	Whistle Blowers Protection Act, 2010	The Act ensures that individuals who report misconduct such as fraud, harassment, or exclusion—are protected from victimization, dismissal, or legal action. This encourages safe and fearless reporting, especially from women and marginalized groups who may otherwise remain silent due to fear of backlash.
9	Inspectorate of Government Act, 2021	The Act empowers the Inspectorate of Government (IG) to investigate corruption, abuse of office, and mal administration in public institutions. This provides a formal channel for escalating serious grievances especially those involving misuse of project funds or unethical conduct by implementing partners.
10	Anti-Corruption Act, 2009	The Act criminalizes a wide range of corrupt practices including bribery, abuse of office, influence peddling, nepotism, fraudulent accounting, and causing financial loss. Complaints involving misuse of project funds, favoritism in beneficiary selection, or unethical conduct by implementing partners fall squarely within this legal framework. The Act empowers police, Inspectorate of Government officers, and prosecutors to investigate and prosecute corruption. Serious grievances received through the GRM can be escalated to these authorities, ensuring legal follow-through and deterrence
11	Employment Act, 2006 & Labour Disputes (Arbitration and Settlement) Act, 2006	This Act governs individual employment relationships and sets minimum standards for labor conditions. Its relevance to the GRM includes: Provides statutory rights around wages, working hours, leave, termination, and protection from discrimination or harassment; GRM can reference these provisions when resolving complaints from project workers or contractors; Prohibits sexual harassment and discrimination in employment (Sections 6–7); Requires written contracts, clear terms of service, and pay statements (Sections 25, 59–61); GRM can verify claims using these documents, ensuring evidence-based resolution. This Act provides mechanisms for resolving industrial and employment disputes through arbitration and the Industrial Court.
12	Occupational Safety & Health Act , 2006	OSHA provides enforceable standards for workplace safety, health, and welfare. The GRM can use these provisions to: Validate grievances related to unsafe working conditions, lack of protective gear, or exposure to hazardous substances; Ensure accountability for employers and contractors who fail to meet safety obligations.

		The Act protects workers' rights to report unsafe conditions without fear of retaliation: Section 36–38: Workers can report dangerous situations and are legally protected from penalties when doing so; This aligns with World Bank ESS2 and ESS10, which require GRMs to be accessible, confidential, and non-retaliatory.
13	Persons with Disabilities Act, 2020	The Act affirms the rights of persons with disabilities to participate equally in social, economic, and political life. The Act mandates accessible buildings, communication formats, and assistive technologies (e.g., braille, sign language, large print; It prohibits discrimination in employment, education, and service delivery; The Act re-establishes the National Council for Persons with Disabilities (NCPD) and promotes local government councils for PWDs. The Act aligns with the UN Convention on the Rights of Persons with Disabilities (CRPD), which informs World Bank ESS10 on stakeholder engagement and ESS2 on labor and working conditions
14	Refugees Act, 2006	The Refugees Act, 2006 is deeply relevant to the Grievance Redress Mechanism (GRM) of the GROW Project Uganda, especially given the project's inclusive mandate and its implementation in refugee-hosting districts. This Act provides the legal framework for protecting refugee rights and ensuring their equitable access to services, which directly informs how grievances from refugee beneficiaries should be handled. The Act affirms refugees' rights to: Freedom of movement within Uganda; Access to employment, education, and health services; Protection from discrimination and arbitrary detention. For GROW's GRM, this means: Refugees must be able to submit grievances freely, without fear of reprisal or exclusion; Complaints about denial of services, discrimination, or exploitation must be addressed in line with these rights.
15	Data Protection Act , 2019	The Act provides a legal framework for safeguarding personal data, which is essential for building trust, ensuring compliance with World Bank safeguards, and protecting the dignity of beneficiaries. The Act applies to any entity that collects, processes, holds, or uses personal data in Uganda including development projects like GROW. GRM Implications: All grievance records, beneficiary details, and incident reports must be handled in line with the Act's principles of lawfulness, fairness, and transparency; Unauthorized sharing or misuse of personal data (e.g. names, contact info, gender, disability status) could lead to legal liability under Sections 35–38. The Act requires informed consent before collecting personal data and mandates that data be used only for the purpose for which it was collected. Special provisions exist for children's data and sensitive personal data, including health, ethnicity, and disability status. The Act mandates technical and organizational measures to secure personal data and requires notification in case of breaches. The Act gives individuals the right to lodge complaints about data misuse and seek compensation for violations
16	GROW Project Policies	The GRM adheres rigorously to the policies detailed in the GROW Project's Operations Manual, Environment and Social Framework, Environment and Social Commitment Plan, Stakeholder Engagement Plan, Resettlement Process Framework, and Labour Management Plan. This alignment not only reinforces consistency in project execution but also ensures that all grievance management procedures meet the established operational and strategic standards set forth by the project.

2.1. Grievance Categories

Project Affected Persons can report grievances related to people or the environment before, during, or after the implementation of activities. The expected grievances, complaints, issues, and concerns are categorized as follows. This list is not exhaustive, and additional grievances may arise as the project progresses. Examples are provided for each category.

2.1.1. General Complaints

- Environmental concerns
- Non-inclusion on the WEPs

- Data Privacy Breaches
- Exclusion from project opportunities
- Delayed disbursement of grant and loan funds
- Charging of illegal fees to access services
- Poor working conditions for site workers
- Delayed payment of service providers
- Delayed payment of site workers' wages
- Delayed or failed to pay for services and goods sourced from community-based members.
- General Misconduct
- Damage and effect on community assets/resources
- Others as applicable in a specific location

2.1.2. Access to Finance

- Grant or loan not selected for funding
- Cancellation of approved grants of loans
- Bank charges by the banks
- Applicants not selected for skilling or training.

2.1.3. Fraud and Corruption

- Charging informal fees
- Extortion
- Nepotism
- Bribery
- Influence peddling
- Procurement
- Provision of incorrect information by beneficiaries
- Others as applicable in a specific location

2.1.4. SEAH/GBV/VAC

- Gender Based Violence (Economic, Physical, Psychological, Emotional and Sexual)
- Sexual Exploitation, Abuse and Harassment
- Domestic violence
- Violence Against Children (Neglect, sexual, bullying, psychological aggression, corporal punishment, child labour, assault, denial of child development services such as education) etc.

2.1.5. Discrimination and Exclusion

- Discrimination of vulnerable marginalized and disadvantaged groups such as Ethnic minorities, PWDs, Elderly, People living with HIV /AIDS etc.

- Exclusion of vulnerable marginalized and disadvantaged groups such as Ethnic minorities, PWDs, Elderly, People living with HIV/ AIDS etc.

2.1.6. Incidents and Accidents

- Social Incidents such as displacement, abuse of vulnerable groups, destruction of cultural resources, violence of any form, Mistreatment, Social Conflicts, Workers Protests, Human Trafficking, Child Labour etc.
- Environment incidents such as Pollution or contamination resulting from project activities, damage to local ecosystems and improper waste management, improper use of chemicals, spillages etc.
- Occupational health and safety incidents such as injuries, breakout of communicable diseases, assault, forced labour, criminal activities, fatalities etc.

2.1.7. Violation of Human Rights

Violation of human rights -Inhumane treatment of any person based on their participation in the project

- Abusive treatment of GROW beneficiaries by a PIU Staff, field worker, service provide or any other stakeholder during project activities
- Use of offensive and derogatory language
- Threatening of beneficiaries
- Land disputes

3.1. Arrangement / Sequencing / Serializing Grievances

Given the nationwide implementation of the GROW Project, the diverse range of stakeholders, and the numerous project activities, the project GRM is anticipated to receive and manage a wide array of complaints, issues, and concerns from various dissatisfied parties. To prevent losing track of individual issues and avoid errors, a standardized system and procedure for "Serializing and Coding" has been developed. This system ensures uniqueness and proper identification/differentiation of complaints and guides documentation in both the Logbook and the GRM-MIS Module. It is tailored to the specific features of the project as follows:

Key Features: For exclusivity, each grievance must bear the following:

i. Grievance
ii. Level of submission (Parish=1, Sub County=2, District/City /Municipality=3 and National=4)
iii. District/City/ Municipality (Three letters: First, Middle and Last letter). If the Count is even, pick the letter after the middle letter.
iv. Sub-county (Three letters: First, Middle and last letter) If the Count is even, pick the letter after the middle letter.
v. Parish (Three letters: First, Middle and last letter) If the Count is even, pick the letter after the middle letter.
vi. Settlement (Three letters: First, Middle and last letter) If the Count is even, pick the letter after the middle letter.
vii. Then lastly numerical, starting with 001

Table 1. Examples of GROW Implementing Districts and Proposed Codes

Sn.	District	Code
1	Adjumani	AMI
2	Arua	AUA
3	Hoima	HIA
4	Isingiro	IGO
5	Kamwenge	KEE
6	Kikuube	KUE
7	Kiryandongo	KNO
8	Koboko	KOO
9	Kyegegwa	KEA
10	Lamwo	LMO
11	Madi-Okollo	MOO
12	Moyo	MYO
13	Obongi	ONI
14	Yumbe	YME

Illustratively, a grievance from Lamwo and Isingiro Districts, respectively, will be coded as follows:

i. A grievance from Lamwo District, Palabek Ogili Sub County, Awic Parish will be coded as follows: GI/LMO/PEI/AIC/001.
ii. Grievances from Isingiro District, Kabingo Sub County, in Kabibi Parish will be coded as: GI/IGO/KIO/KII/001

3.2. Coding / Serializing by Level in the GRM Structure

The table below provides details to be followed when coding/ serializing the various levels of grievances, pointing out the key issues at each of the levels

Table 2. Coding and key features used at various grievance levels

Level	Key features.	Coding/serializing.
Community	GI, District, Sub County, Parish	G1/LMO/PEI/AIC/001 GI/IGO/KIO/KII/001
Sub County	G2, District, Sub County	G2/LMO/PEI/001 G2/IGO/KIO/001
District/city/municipality/ division (Direct submission)	G3, District	G3/LMO/001 G3/IGO/001
MGLSD/GROW Safeguards Unit / National (Direct submission)	MGLSD/GROW	G4/001

***NB:** In case of referrals from lower to upper levels, original coding/serializing will be maintained.*

3.3. Conceptual Framework of the GROW Project GRM

The GROW-GRM structure is a meticulously designed, multi-tiered framework aimed at ensuring effective grievance redress at all levels of project implementation. The structure consists of the following tiers: Village (Tier 1); Parish (Tier 2); Sub-county (Tier 3); District (Tier 4); Ministry Level

(MGLSD & PSFU-PIUs – Tier 5). This structure is overseen and guided by the Project Technical Committee (PTC) and the Project Steering Committee (PSC), ensuring that grievances are managed with the highest level of oversight and accountability. Given the national scope of the project, it may not be feasible to establish operational Grievance Redress Committees (GRCs) at the parish, village, and sub-county levels. To address this, focal point officers have been strategically appointed at the district, city, municipality, and division levels. These officers are responsible for gathering grievances within their jurisdictions and relaying them to the respective GRCs or higher authorities, ensuring that no grievance is overlooked.

The project leverages existing community structures, such as local councils, to assist in the collection and preliminary handling of grievances. This integration ensures that the GRM is deeply rooted within the community, making it more accessible and effective for all stakeholders. At each level, an appropriate grievance redress committee (GRC) is established, equipped, and trained to receive; document; assess and resolve grievances. Depending on the nature and complexity of the grievance, GRCs can refer or escalate issues to the relevant levels and structures, both vertically and horizontally. This ensures that grievances are handled by the most appropriate authority, facilitating timely and effective resolution. The GROW-GRM structure is a robust and comprehensive mechanism designed to address grievances effectively and efficiently. By appointing focal point officers, leveraging community structures, and establishing well-equipped GRCs at various levels, the project ensures that all grievances are heard, addressed, and resolved promptly. This structure not only enhances trust and credibility but also contributes significantly to the overall success and sustainability of the project.

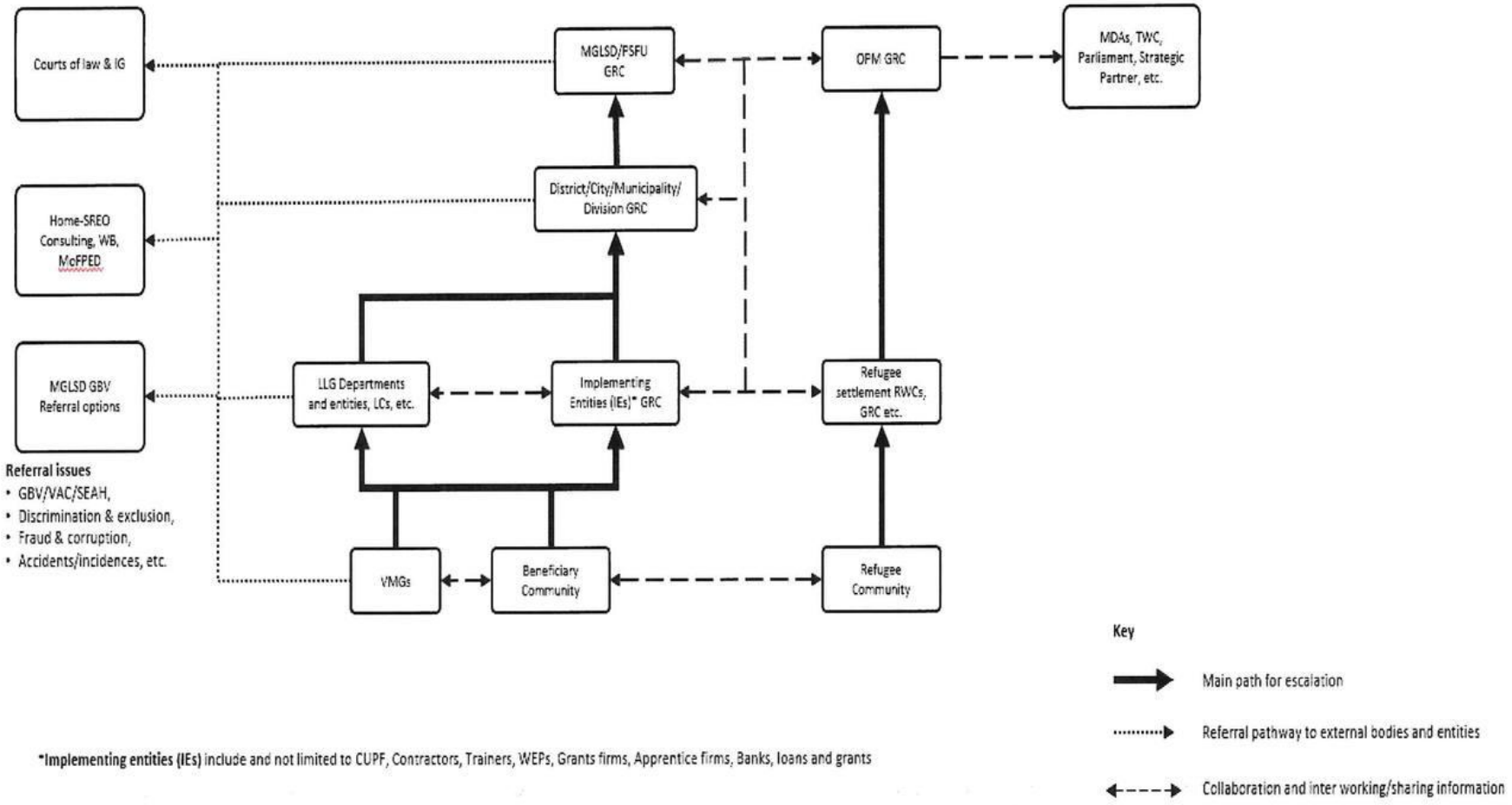
3.3.1. Referral Pathways

The GROW-GRM structure is designed with both vertical and horizontal referral pathways and collaborative linkages to existing legitimate systems and structures at various levels. This design allows for referral, escalation, or appeal in case of dissatisfaction with the resolution at one level or for grievances beyond the jurisdiction of a particular level. Key features of the framework include:

1. Referral and Escalation Mechanisms:
    - Vertical Pathways, which enable grievances to be escalated from one level to a higher level if the resolution at the initial level is unsatisfactory or if the grievance falls outside the initial level's jurisdiction.
    - Horizontal Pathways, which allow for collaboration and referral to parallel structures or similar projects, ensuring comprehensive grievance handling.
2. Collaborative Linkages:
    - The structure incorporates linkages to existing systems and structures such as local councils and community organizations. This integration ensures that grievances are addressed using established and trusted mechanisms, enhancing the GRM's effectiveness.

3. Types of Grievances beyond Jurisdiction: The following are examples of grievances that may require referral or escalation due to their complexity or severity. Sexual Exploitation, Abuse, and Harassment (SEAH); Gender-Based Violence/Violence Against Children (GBV/VAC); Fraud and Corruption; Fatalities and Serious Injuries; Criminal Cases; Land-related Disputes; Discrimination and Exclusion.

3.3.2. Updated GRM Structure and Referral Pathways (*Specific pathways for Partners are in separate document for Training Materials*)



*Implementing entities (IEs) include and not limited to CUPF, Contractors, Trainers, WEPs, Grants firms, Apprentice firms, Banks, loans and grants

Figure 1. GROW project GRM and referral pathways

3.3.3. Appeals

Appeals in the GROW-GRM shall be of three types, namely;

3.3.3.1. Unresolved issues and grievances escalation

All grievances that remain unresolved or unsatisfactorily addressed by lower-level structures shall be escalated for further review. Redress for every appealed case at the respective structures or entities must be completed within 15 working days of receipt of the appeal. In cases involving Gender-Based Violence (GBV), the standard 15-working-day timeline may be extended by up to an additional 15 working days (for a total of 30 working days) to ensure a thorough, sensitive, and survivor-centred process. Requests for an extension in GBV cases must be documented in writing, citing the justification for the additional time and communicated promptly to the complainant, including a revised expected resolution dates.

Lower-level structures shall attempt informal resolution within their mandate and where necessary, they shall escalate unresolved grievances within 5 working days to the higher authority. Subsequent to receiving the grievances, the higher authority shall acknowledge receipt of the appeal within 2 working days and shall oversee the investigation, interviews and evidence gathering while ensuring adherence to confidentiality and survivor support protocols. Where necessary, the GBV case manager shall coordinate with medical, legal and psychosocial support services to monitor progress and flag any further delays. A completion report shall be drafted and lessons learned shared with senior management at the GROW Project office. Complainants shall receive written confirmation of appeal receipt; a periodic status update at least every 7 working days; final decision, rationale, and any corrective actions implemented.

3.3.3.2. Appeal to the World Bank Redress Service

Further escalation shall made to the World Bank Redress Service where the affected persons feel that they have already tried and exhausted the project-level grievance mechanism but have failed to get satisfactory redress. The appeal to the World Bank Redress shall be made during the implementation period of the GROW project or when the project has closed within the last 15 months.

Grievances submitted to the World Bank Redress Service shall be acknowledged within 2 business days of receipt; preliminary review is often undertaken within 15 business days to determine admissibility and next steps. Mediation/ follow up is then undertaken by the GRS and task team in coordination with the aggrieved party to seek resolution, typically within 60 business days of acknowledgement, though complex cases may take longer. Subsequent to the mediation, the aggrieved party shall receive a written statement of outcomes and agreed actions.

Note: The aggrieved party should endeavor to file with the GRS as soon as project-level channels stall. Early filing (ideally while the project is active) shall maximize the chance of operational fixes.

3.3.3.3. Appeal to the World Bank inspection panel

The aggrieved party may also directly appeal to the World Bank Inspection Panel where:

- They remain unsatisfied after engaging the project-level mechanisms and/or the GRS (though use of GRS is not a legal prerequisite).
- The aggrieved party seeks an independent compliance review to verify whether the Bank has followed its policies.
- The aggrieved party seeks a formal, public process that can lead to Management Action Plans signed off by the President.

The aggrieved party shall submit a Request for Inspection in writing to the Panel Secretariat. The request must be filed within six years of the Board approval of the project (subject to limited exceptions for newly disclosed harms). The key details of the request shall include: project name, Board approval date, aggrieved party's contact information, description of harm, and evidence or examples of policy non-compliance.

At the level of the inspection panel, the Secretariat shall acknowledge receipt within 10 business days. Management shall then respond to the request Management Response Document (MRD) in 21 days (MRD). The next step shall be Panel Eligibility Determination and within 20 business days of receiving the MRD, the Panel shall decide whether to register the case for a full investigation. Where the case is registered, the Panel has up to 6 months to complete its compliance review (extensions possible). Following an investigation, Management prepares an Action Plan to address findings publicly disclosed upon President's approval.

Note: The aggrieved party shall prepare their request thoroughly and submit well before the six-year cutoff. If the grievance to be reported is still within 15 months of project closure, it's often faster to first try the GRS for operational remedies, then escalate to the IP if necessary.

3.4. Composition and Roles of the GRCs at Various Levels

The composition of GRCs at the various levels of the structure and their respective roles will be as detailed in the table below.

Tier	GRC	Composition	Roles and Responsibilities
Tier 1	Village	LC1 Executive	As per the generic roles below
Tier 2	Parish/Ward	Parish Chief; LC11 C/P	As per the generic roles below
Tier 3	Sub county/Town Council/Mc	SAS/TC; CDO; Extension Officer; Secretary Social Services.	As per the generic roles below
	Service Providers and MFIs	FPPs and Existing Committees	As per the generic roles below
	Refugee Settlement	Assistant Settlement Commandant; Community Services Officer; RWC3 C/P; NGO/CBO representative	As per the generic roles below
Tier 4	District/City/ Municipality/ Division	CAO-TC/CAO's representative; DCDO; 3 Women Entrepreneurs; Commercial Officer;	As per the generic roles below Undertake capacity building of the GRCs within the District/City Receive, Clean, analyze and compile reports from all lower-level GRCs

Tier	GRC	Composition	Roles and Responsibilities
		Planner; Labour Officer; Health Officer; Environment Officer	Upload grievance management info into the MIS Monitor and supervise Lower level GRCs
Tier 5	MGLSD	Social Development Specialist	As per the generic roles below Development of the GRM System and MIS module Development of standards and guidelines Plan and participate in capacity building of all lower-level GRCs Receive, Clean, analyze and compile reports from implementing districts Monitoring and evaluating GRM systems and respective GRCs in districts.
	PSFU	Social Development Specialist; Client Care Officer	As per the generic roles below Development of the GRM System and MIS module Development of standards and guidelines Plan and participate in capacity building of all lower-level GRCs Receive, Clean, analyze and compile reports from implementing districts Monitoring and evaluating GRM systems and respective GRCs in districts.
	PIT	PC GROW; SDS; Component specialists (coopted where necessary)	Technical Oversight Linkage to relevant regulatory bodies whenever deemed necessary
	PTC & PSC		Overall oversight Policy guidance

Table 2. Proposed Composition and roles of the GRCs at various tiers

3.4.1. Roles of GRCs at Various Levels

i. Record grievances and concerns meticulously in a log book or upload them into the Management Information System (MIS) for tracking and monitoring.

ii. Thoroughly assess, verify, and investigate grievances to gather factual information for objective resolution.

iii. Consult or co-opt any relevant parties deemed necessary for resolving the respective grievances effectively.

iv. Resolve grievances in a standardized manner and provide timely feedback to the complainant and other relevant parties.

v. Refer or escalate complaints/issues beyond respective jurisdiction or in case of dissatisfaction promptly to higher authorities.

vi. Actively participate in awareness creation activities for the GRM to ensure stakeholders are informed about the mechanism.

vii. Maintain proper and organized records of all grievance management information for transparency and accountability.

viii. Compile and submit periodic reports in accordance with the established reporting arrangements.

ix. Seek support and guidance from higher authorities whenever necessary to ensure effective grievance management.

x. Participate in GRM trainings conducted by the Project Implementation Team (PIT) to stay updated and improve skills.

3.5. Operationalization of the Referral System

The Project GRM referral systems will be activated and operate scenarios and categories of grievances/concerns including (i)Grievance due to nature and type beyond the jurisdiction of respective GRCs; (ii)Grievance deemed resolved, but the complainant is dissatisfied and requests for escalation and; (iii)Grievances that are unique and sensitive especially those in relation to discrimination and exclusion of vulnerable and marginalized groups shall be handled by a specialized designated resolution party/ Third Party Monitoring Party (SREO Consulting) on hotline 0800333125. Referral pathways to legitimate and mandated entities and offices will operationalize the referral systems and processes vertically and horizontally depending on the nature/type of issue/grievance and tier. Possible referral centres deemed legitimate include; LC Offices, Justice and Law Order Sector (JLOS) Institutions including Police, Administrative Office (CAO), Relevant LG Departments such as the Labour Office and Probation Officers, government regulatory bodies, Uganda Human Rights Commission (UHRC), Equal Opportunities Commission (EOC), State House Ani Corruption Unit (SHACU), Health facilities for GBV response, National Union for Disabled Persons of Uganda.

As part of the GROW Project, the World Bank has engaged SREO Consulting to manage inclusion and non-discrimination grievances arising in the wake of the Anti-Homosexuality Act. SREO's mandate under this assignment includes: strengthening the GRM; review and enhance the project's existing Grievance Redress Mechanism; ensure all processes explicitly address inclusion and non-discrimination; outreach and sensitization; design and roll out community-level campaigns on rights and redress pathways; engage vulnerable and marginalized groups to build trust in the GRM; capacity strengthening & technical support; provide tailored training for Project Implementation Units (PIUs) on inclusive practices; develop toolkits, standard operating procedures, and job aids for frontline staff; Monitoring & Evaluation; establish indicators and data-collection systems to track grievance trends, resolution timeliness, and beneficiary satisfaction and generate periodic reports with actionable recommendations for continuous improvement. Through these activities, SREO Consulting will help ensure the GROW Project's grievance system is accessible, responsive, and aligned with international best practices on inclusion and non-discrimination.

The table below provides illustrative examples of issues/grievances for referral and corresponding appropriate referral centers.

Table 3. Categories of grievances and corresponding referral entities

Issue/complaint	Possible referral center
Criminal issues	Police
Fraud and Corruption	Inspectorate of Government (IG) and State House Anti-Corruption Unit
GBV/VAC/SEAH	JLOS Institutions including Police-CFPU; Office of the GROW Focal point officers; District Gender Officer; Mapped/ Designated GBV Service providers
General issues (Not resolved to the satisfaction of complainants)	Upper Tier GRCs; LCs (Host Communities); Refugee Welfare Committees (RWCs)
Non-adherence to national standards and regulations	Mandated MDAs; Respective Regulatory Bodies
Discrimination and Exclusion of the Vulnerable and Marginalized Groups	SREO-Consulting

3.6. Grievance Management Process

The grievance resolution process under GROW is simple and inclusive, ensuring accessibility for all categories of aggrieved/ dissatisfied parties. The process comprises four major stages, with an expected standard resolution period of no more than 15 days. However for complex cases including but not limited to GBV and Fraud, the resolution period may be extended beyond the 15 days. The phases are as outlined below, namely:

- Phase 1: Submission of Grievance
- Phase 2: Receipt/Registration/Documentation
- Phase 3: Assessment/ Fact Finding/Verification (Investigation)
- Phase 4: Resolution and Feedback

The figure below provides an illustration of the above highlighted 4 phases.

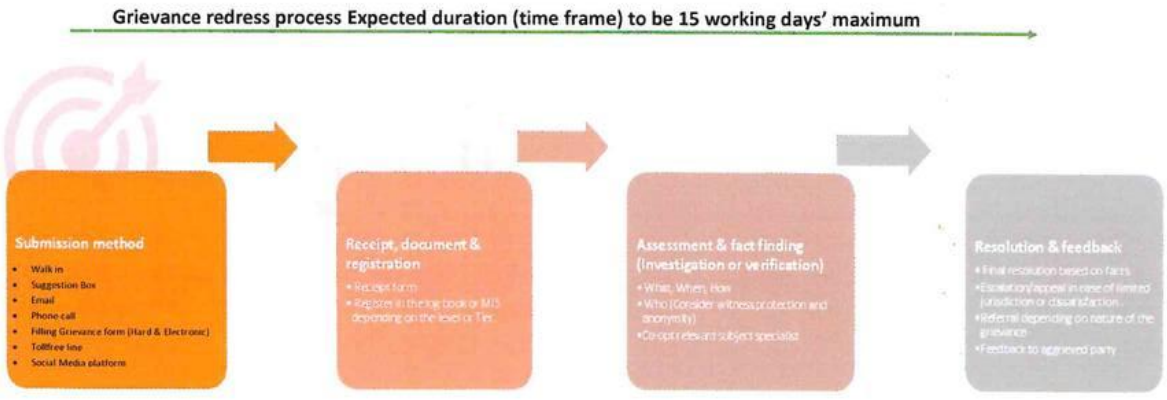


Figure 3. Phases of managing grievances in the GROW project

3.6.1. Detailed Description of Grievances Management Process

Table 4. Description of the grievance management process under GROW.

Phase	Description
Phase 1: Submission of Grievance	• Complaints/ issues/ concerns can be submitted to the secretary or any other member of the GRCs at any level by individuals, groups of individuals or entities • Complaints/ issues/ concerns can be submitted using the following means: in person, suggestion box, e-mail, phone call, feeling grievance forms or online website • The complainant should provide personal details including name, age, address, gender, description of the grievance, and location of the grievance. • Groups and other entities provide details that include: composition, affiliation, address, description of the grievance and the location of the grievance • Options of anonymity is permissible • The submission can be to the secretary
Phase 2: Receipt/Registration/ Documentation	• Complaints/ issues/concerns submitted by any means must be registered by the secretary or any designated member of the GRC at any level of reporting • Registration should be done on a provided standard register / log book depending on accessibility • The GRC upon registration should issue a receipt of acknowledgement to the complainant • The registration status will be updated as the grievance handling process progresses (e.g. pending, resolved, referred, closed, etc.) • Each complaint/issue/ concern will be serialized (unique code) for easy referencing and tracking • All complaints/ issues/ concerns must be subsequently uploaded/recorded into the MIS by the GRC secretaries (Social Development Specialist at MGLSD and PSFU, Focal Point Officers at Local Government and Representatives for Women Affairs in the Refugee Welfare Committees).Implementing partners including the Work placement , entities, contractors and others shall also delegate personnel within the entity GRC to enter grievances in the MIS
Phase 3: Assessment/ Fact Finding/Verification (Investigation)	• All complaints/issues/concerns will be objectively assessed, investigated, verified for facts to support fair resolution by the respective committees • Committee members may co-opt none members and subject specialists to support the resolution process • Every sitting called must satisfy the quorum (⅔ or 75%) • Documentation of the entire process must be ensured for referencing • The committee may summon the complainant, witnesses and the accused **Note:** For unique and sensitive cases in relation to discrimination, exclusion and fatality must be referred to relevant entities such as SREO Consulting, Police, IG, etc.
Phase 4: Resolution and Feedback	• Based on the result of the assessment, the GRC makes a final resolution • The resolution must be endorsed by all sitting members • The GRC must share the resolution with the complaint and any other relevant party to the complaint • The complaint must be given the option of appealing in situations where they are not satisfied with the resolution • Cases beyond the jurisdiction of the GRC must be escalated or referred

3.6.2. Channels for Receiving Grievances under GROW Project

Under the GROW Project, at MGLSD / PSFU PITs and across all project implementation areas, the grievances/concerns shall be received through multiple channels as indicated in the tabular.

Table 5. Channels for receiving grievances under the GROW Project

S/n	Grievance receipt channel	Detail
1	Toll-free lines	0800307777 and 039-4514071
2	Emails	info@grow.go.ug , grievances@grow.go.ug & grow@psfu.org.ug.
3	WhatsApp number	PSFU 076-2304961
4	GROW Project Focal Point Officers	Focal point officers for grievances at District, City, Division and Municipalities, also secretaries to the GRCs.
5	Regional WhatsApp groups for FPOs	Four WhatsApp groups have been established for focal point officers in respective regions (West, North, Central and East) to ensure effective communication among them and the stakeholders.
6	e-grievance registration	The form can be accessed on the project website: https//: www.grow.go.ug.
7	Telephone	Grievances can also be received through the individual phones of GRC Secretaries
8	Physical Grievance Form and Suggestions boxes	Physical grievance registration forms are availed on the suggestion boxes at both MGLSD, PSFU and GROW Project Regional Offices
9	Walk-in grievance registration.	Walk-in grievances are received, registered and resolved at project offices Client Relations Officer, located at PSFU GROW Project Offices

3.6.3. Channels for Receiving Grievances in specific Participation Financial Institutions

Under the GROW Project, grievances and concerns at partner Financial Institutions (FIs) will be received through various channels. Each institution will offer specific methods for stakeholders to submit their issues, ensuring accessibility and efficiency. To establish the existence of GRM structures among the PFIs, a GRM survey was conducted. The findings of this survey are presented in the table below.

Table 6. Status of GRM structures among individual performing financial institutions under GROW project

Sn	Partner Financial Institution	Corresponding official means of submission of complaints/grievances/concerns
1.	Finance Trust Bank	✓ Toll-free line 0800220500 ✓ Social media (WhatsApp) 0751932900/0701932901, ✓ FB-@Finance Trust Bank Uganda ✓ X-@financetrustug
2.	Centenary Bank	✓ Suggestion boxes stationed at all branches ✓ In writing addressed to either the branch manager or customer care consultant ✓ walk into the Customer Consultant Desk ✓ Toll-free line (0800200555) ✓ Social media (youtube@CentenaryBankug; facebook; centenarybank(bluekker); Twitter@CentenaryBank, Linkidin-Centenary Bank) ✓ email; info@centenaryhelpline.co.ug
3.	Equity Bank	✓ Suggestion boxes at all branches ✓ Walk in to center reception desks ✓ Toll-free line 0800232700 (Available 24 hours) ✓ email: info@equitybank.co.ug, website: Home-Equity Bank Uganda ✓ Social Media accounts
4.	DFCU Bank	✓ Walk in to the Customer Service Officers or Manager ✓ Toll free lines 0800222000/0414351000 ✓ Social media WhatsApp account 0776760760

5.	Post Bank	✓ Walk in to branch front facing staff(Customer Service Officers) ✓ Suggestion boxes strategically positioned in all branches ✓ QR Codes ✓ Feedback books instituted across all branches ✓ Toll free line 0800217200 ✓ Social media (WhatsApp number +256-707993930) ✓ Email;customerservice@postbank.co.ug ✓ Social Media, Twitter and Linkedin

3.6.4. Methods of Grievance Resolution

Complaints/issues/concerns will be managed on a case-by-case basis using various appropriate methods, including clarification/explanation, dialogue/negotiation, arbitration, mediation and referral to relevant entities and offices. The elements of these methods are described in the table below.

Table 7. Grievance resolution methods and their respective elements

S/n	Resolution method	Elements
1.	Clarification/ explanation	• This will primarily provide information regarding inquiries about the project, specifically referring to its design features, implementation modalities, processes, and procedures
2.	Dialogue/ negotiation	• Dialogue shall aim to facilitate open and constructive communication between parties involved in a conflict or grievance. It shall help in understanding each other's perspectives and identifying common ground. • Mediation shall aim to resolve conflicts by involving a neutral third party to help the conflicting parties reach a mutually acceptable solution.
3.	Arbitration	• A method of resolving disputes outside the courts. It involves a neutral third party, called an arbitrator, who shall hear the evidence and arguments from both sides and then decides. • The process is private and less formal than court proceedings and can be tailored to the needs of the parties
4.	Mediation	• A voluntary and confidential process where a neutral third party, known as a mediator, helps disputing parties reach a mutually acceptable agreement. It may be an informal meeting among the parties or a scheduled settlement conference. • The discussions and any information shared during the mediation are kept confidential. • Mediation follows a structured process, including opening statement, identification of issues, negotiation, and final agreement. • The dispute may be pending in a court or potentially a dispute which may be filed in court. • The goal is to reach a solution that is acceptable to both parties, rather than imposing a decision.
5.	Referral	• Directing a grievance to the appropriate authority or entity that can address it more effectively. This process ensures that grievances are handled by the right people with the necessary expertise and resources. This shall ensure that quicker resolution is reached and stakeholder satisfaction is improved. • Referral shall be made in any of the following scenarios: • Cases beyond the jurisdiction of the respective GRC • Dissatisfaction by the complainant • Sensitive and unique (SEAH, death, criminal, discrimination and exclusion, criminal, etc.) referrals are made to the relevant mandated entities.

3.7. Management of GBV/SEA/SH Related Cases

This GRM Handbook has put in place procedures that should be followed when reporting, investigating and resolving or referring gender-based violence or sexual abuse cases that may arise from implementation of GROW. It is important to note that some special cases shall not be handled by the GROW GRCs/RWCs. The committee members shall be oriented on the proper channels to use. These special cases include the following:

Criminal cases: All recorded cases by the GRM Committee that have been examined and found to be criminal by its nature shall be reported to Police immediately. Communities will be sensitized on such cases and report to the police directly.

Sexual exploitation and abuse (SEA) and Gender based violence: Sexual exploitation and abuse (SEA) and gender-based violence (GBV) cases are different from other complaints that are normally handled by GRCs /RWCs committees. These are special cases that shall be handled in a manner that ensures confidentiality of the information at hand. The GRM shall direct the GBV cases to relevant stakeholders at the community or district level. Communities will be sensitized to report any cases of GBV and child protection issues to national Uganda Child Helpline Sauti-116 – Ministry of Gender Labour & Social Development.

Child Labour: GROW adopts zero tolerance to any form of child labour. Proper action shall be taken to any contractor, service provider or beneficiary perpetrating this unethical conduct. The cases will be recorded and reported to relevant authorities.

Uganda government laws, policies and strategies and other international instruments shall be adhered to when handling cases of sexual abuse and gender-based violence emanating from implementation from GROW. These international instruments, laws, policies and strategies are referred to in *section 1.7.*

3.7.1. GBV Referral pathway

Reporting sexual harassment helps put an end to offensive behavioural and encourages other victims to speak up. The contractor should always guide and advice the community, workers and agents to report any suspected case of GBV perpetrators of Gender based violence/ sexual harassment may be subject to disciplinary action and criminal charges. Disciplinary and criminal procedures are independent of one another and may be undertaken simultaneously.
In a formal reporting, the following procedure will be undertaken using the report form.

1. Getting the details of the Victim of GBV
2. Documenting the details of the Case
3. Preparing witnesses to engage other Legal Actors like the Police
4. Establishing the appropriate procedure including the need to for medical examination of the victim and the perpetuator
5. Producing a comprehensive report to enable duty bearers assess and take appropriate actions
6. Submitting the report to Duty Bearers like Uganda Police, State Attorneys and Courts
7. Follow up of GBV Cases and victims to ensure appropriate services are accessed by the Victim.
8. In addition to the existing GBV services providers, additional service providers identified by CARE International will be used to offer services to GBV survivors.

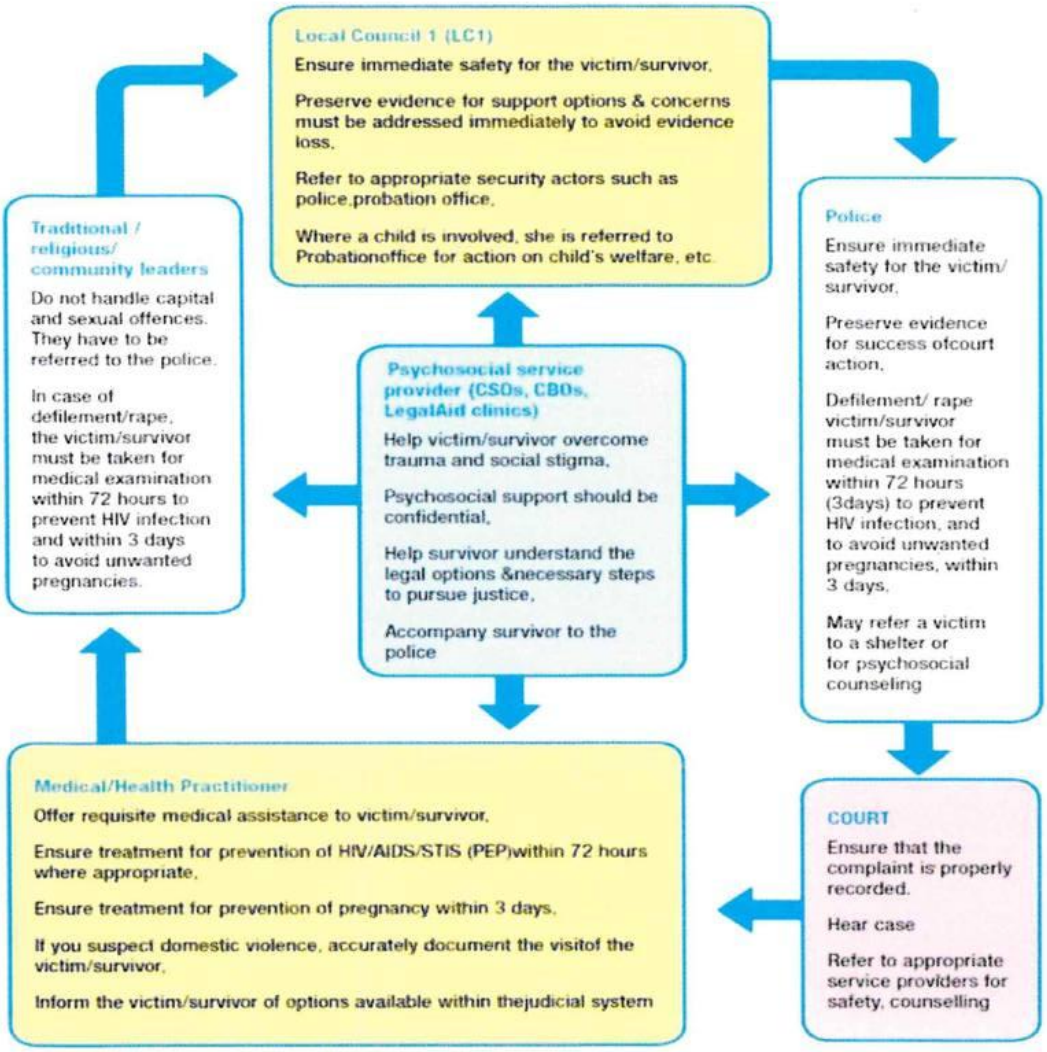
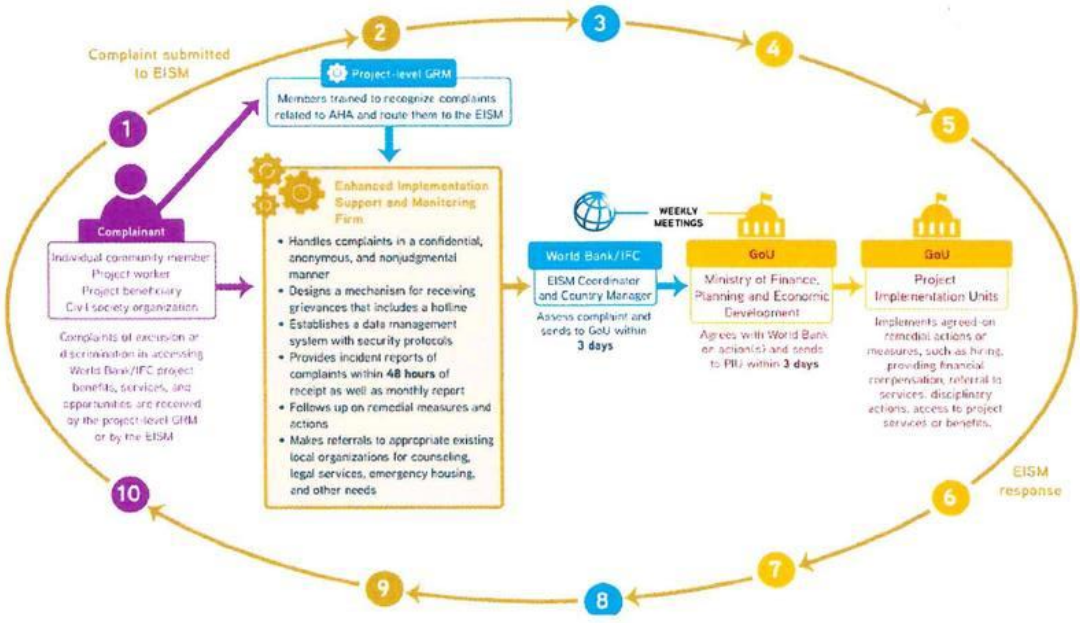


Figure 4. Gender Based Violence Referral Pathway under the GROW Project

Referral Pathway for Grievances to be handled by SREO Consulting.



4.1 Implementation Arrangements of the Grievance Redress Mechanism.

- ✓ Establish, train and equip GRCs with the universal representation of Vulnerable and Marginalised Groups such as women entrepreneurs with disabilities, women entrepreneurs among ethnic minorities, women entrepreneurs with HIV/AIDS and refugee women entrepreneurs.
- ✓ Strong capacity building element including modules in handling vulnerable and Marginalised Groups
- ✓ Welfare arrangements for the GRCs including allowances, transport facilities visibility materials
- ✓ Robust communication/publicity strategy for awareness creation about the GRM, which includes appropriate channels for PWDs such as; Sign language interpreters, PWDs Entities (NUDIPU), Screen readers Apps (JAWS) and Fusion "
- ✓ Relevant infrastructure such as suggestion boxes should be accessible to all including PWDs (Height of positioning).
- ✓ A robust GRM-MIS module
- ✓ A comprehensive M&E Framework for the GRM, learning and decision-making.
- ✓ Strong technical supervision and monitoring
- ✓ Proportionate budgetary allocation for GRM implementation.
- ✓ Periodic auditing of the operation of the GRM

4.2. Proposed Activities

In relation to the Environment and Social Commitment Plan (ESCP) and the E&S Capacity building plan, creating awareness about the GRM among key stakeholders of the GROW Project is essential. These stakeholders include beneficiary women entrepreneurs, district implementation teams, service providers, contractors, and Grievance Redress Committees (GRCs). This awareness will foster a comprehensive understanding of the GRM's operations, including the structure, composition, and location of GRCs, the GRM process, grievance submission methods, and referral pathways, thereby ensuring effective utilisation. The proposed implementable activities are listed below.

Table 8. Key components and activities of GRM Implementation

Sn	Component of Awareness creation and Activities
1	**Stakeholder Identification**
a	Awareness Activity 1: Ensure Beneficiary Women Entrepreneurs understand how to access and utilize the GRM.
b	Awareness Activity 2: Train District Implementation Teams to facilitate the GRM process in their jurisdiction.
c	Awareness activity 3: Inform Service Providers and Contractors about their roles and responsibilities in the GRM framework
d	Awareness Activity 4: Equip Grievance Redress committee members with knowledge about the GRM structure, processes, and referral pathways
2	**GRM Structure and Composition**
a	Awareness Activity 1: Educate stakeholders on the hierarchical structure of the GRM, including the village (Tier 1), parish (Tier 2), sub-county (Tier 3), and district (Tier 4), and ministry level (Tier 5).
b	Awareness Activity 2: Provide details about the composition of GRCs at each level and their specific roles
3	**Location of GRCs**
a	Awareness Activity 1: Disseminate information about the physical and/or virtual locations of GRCs to ensure accessibility for all stakeholders
4	**GRM Process**
a	Awareness Activity 1: Explain the step-by-step process of how grievances are received, documented, assessed, and resolved

b	Awareness Activity 2: Highlight the importance of timely feedback and follow-up with complainants
5	**Grievance Submission Methods**
a	Awareness Activity 1: Inform stakeholders about the various methods available for submitting grievances, including in-person submissions, online platforms, and helplines.
b	Awareness Activity 2: Emphasize the importance of confidentiality and protection against reprisals.
6	**Referral Pathways**
a	Clarify the referral and escalation pathways for grievances that require higher-level intervention or those that fall outside the jurisdiction of a particular GRC
b	Highlight the role of focal point officers and existing community structures in the referral process.

By creating comprehensive awareness about the GRM among key stakeholders, the GROW Project can ensure that the mechanism is effectively utilized, fostering transparency, accountability, and trust. This will ultimately contribute to the successful implementation and sustainability of the project. To ensure comprehensive dissemination of information to various stakeholders under the GROW Project, effective communication and publicity will be undertaken.

4.3. Methodology for Communicating the GRM

Creating awareness about the Grievance Redress Mechanism (GRM) among key stakeholders of the GROW Project is vital for its success. These stakeholders include beneficiary women entrepreneurs, district implementation teams, service providers, contractors, and Grievance Redress Committees (GRCs). Raising awareness will ensure a comprehensive understanding of the GRM's operations and facilitate its effective utilisation.

Table 9. GRM communication and awareness methods

Community engagements	Print media	Electronic media	Social media platforms	Physical locations
• Durbars/Baraza • Meetings • Communal events • Social events • Local Fora • Women Entrepreneur Platforms etc. • Workshops	• Newspapers • Community billboards • GROW Journal • Posters • Banners • Leaflets etc.	• GROW toll-free line: 0800307777 • GROW Website: grow.go.ug • Television • Radio talk shows and hotspot messaging • Emails: grievances@grow.go.ug & info@grow.go.ug • Short documentaries and videos • Electronic channels configured for PWDs including Job Access With Speech (JAWS) and Fusion application • SREO Consulting toll free line 0800333125	• Facebook • WhatsApp platforms • GROW App	• GROW offices (MGLSD &PSFU) • Focal point officers at District/ city/municipality /division offices • Offices of service providers & key stakeholders. • Offices of special interest groups such as NUDIPU

4.3.1. Modalities of Communication

All communication under the GROW Project GRM will adhere to the communication protocol outlined in the project's communication strategy. This approach ensures clarity, consistency, and efficiency in disseminating information to all stakeholders. The key components of this protocol are as follows:

i. All relevant documents and reports regarding GRM operations will be conveyed in English to maintain uniformity and standardization.
ii. When necessary, translations into key local languages in the implementation sub-regions (Acholi, Luo, Runyakitara, Runyole, Runyoro-Rutoro, Lusoga, Lugisu, Akaramajong, Langi, Ateso, Swahili, Alur, Luganda, Lingala and Arabic) will be provided to ensures that all stakeholders, regardless of their language proficiency, can access and understand the information effectively.
iii. Multiple communication channels will be utilized to reach diverse stakeholder groups. This includes printed materials, digital platforms, community meetings, and other appropriate means.
iv. Information Education and Communication (IEC) materials such as brochures, posters, and flyers will be created and widely distributed. These materials will detail the different grievance redress options, submission methods, and referral pathways.
v. Stakeholder Training and Awareness will be undertaken through Training to familiarize stakeholders with the communication protocol and the GRM processes. Additionally, publicity campaigns will be launched to raise awareness about the GRM, ensuring that all stakeholders are informed about how to access and use the mechanism.
vi. Feedback Mechanisms /channels for two-way communication will be established allowing stakeholders to provide feedback, ask questions, and seek clarification. Additionally, Regular updates will be provided to keep stakeholders informed about GRM operations and any changes to the communication protocol.

By adhering to this comprehensive communication protocol, the GROW Project ensures that all stakeholders are well-informed and engaged, fostering trust, transparency, and effective grievance redress.

5.1. Design of the GROW-MIS Module

The GROW Project's Grievance Redress Mechanism (GRM) will be bolstered by a purpose-designed GRM-MIS (Management Information System) module that meets both functional and technical specifications. The primary aim of the GRM-MIS module is to enhance the efficiency and effectiveness of the GRM by providing a clear, transparent, and credible process for receiving, documenting, and resolving grievances. Key Objectives of the GRM-MIS Module include

i. Facilitate efficiency and effectiveness in management of grievances through streamlining the process of grievance redress to ensure timely and efficient handling of grievances. The system shall ensure that grievances are systematically tracked and managed.
ii. Provide a transparent process for stakeholders to submit grievances and track their progress.
iii. To collect and analyze data related to grievances to identify trends, recurring issues, and areas for improvement and Use the data for reference and planning to enhance the project's operations and preempt potential issues.

5.2. Proposed Design, Functional Specifications, and Technical Requirements:

i. The module on GRM will integrated within the GROW-MIS and will be built on a robust, scalable architecture to handle a large volume of data and users. Integration will be made with existing project management systems to ensure seamless data flow and coordination.

ii. Functional Specifications will include grievance data analytics like flow charts and data flow diagrams that align with the GROW GRM MIS. These will form the main input to the database and workflow logic; an intuitive user interface for stakeholders to easily submit grievances, check status updates, and receive feedback and; efficient data management protocols to ensure accurate and secure storage of grievance-related information.
iii. Technical Requirements will include Integration with a reliable database system to store and manage all grievance data; robust security measures to protect sensitive information and ensure data privacy and; advanced reporting tools to generate comprehensive reports and analytics for decision-making and planning.

5.2.1. Grievance Module Technological Conceptual Framework

The system module will be web-based and installed at a central point at MGLSD-GROW. It will be accessible at the national, district, city, municipality, and division levels. Being web-based, the data and information in the system will automatically synchronize whenever there is an update from any reporting level of the GRM, ensuring seamless and up-to-date information flow across all levels.

5.2.2. Access Levels and Permissions

The GROW Project's GRM module will be centrally hosted at the ministry and accessed over the web to ensure centralized control and efficiency. Below are the key aspects of the access protocol and the overall system architecture:

i. The system will be hosted centrally at the ministry, ensuring streamlined management and data security. Centralized hosting will allow for efficient maintenance, updates, and control over the GRM-MIS.
ii. GROW focal point officers at various levels, including district, city, municipality, and division, will be granted access to the MIS. These officers will be responsible for capturing and entering information into the system, ensuring real-time data entry and management.
iii. The system administrator at the national level will create accounts and provide access to relevant national-level users and officers from MGLSD, PSFU, and various GRCs. Access credentials will be issued to GROW focal point persons at district, city, municipality, and division levels, enabling them to log in whenever they have internet access or through their smartphones.
iv. Different user access levels will be defined within the MIS and the GRM module to ensure appropriate permissions and data security. Access levels will be assigned based on the roles and responsibilities of the users, ensuring that each user can access only the information they need for their specific tasks.

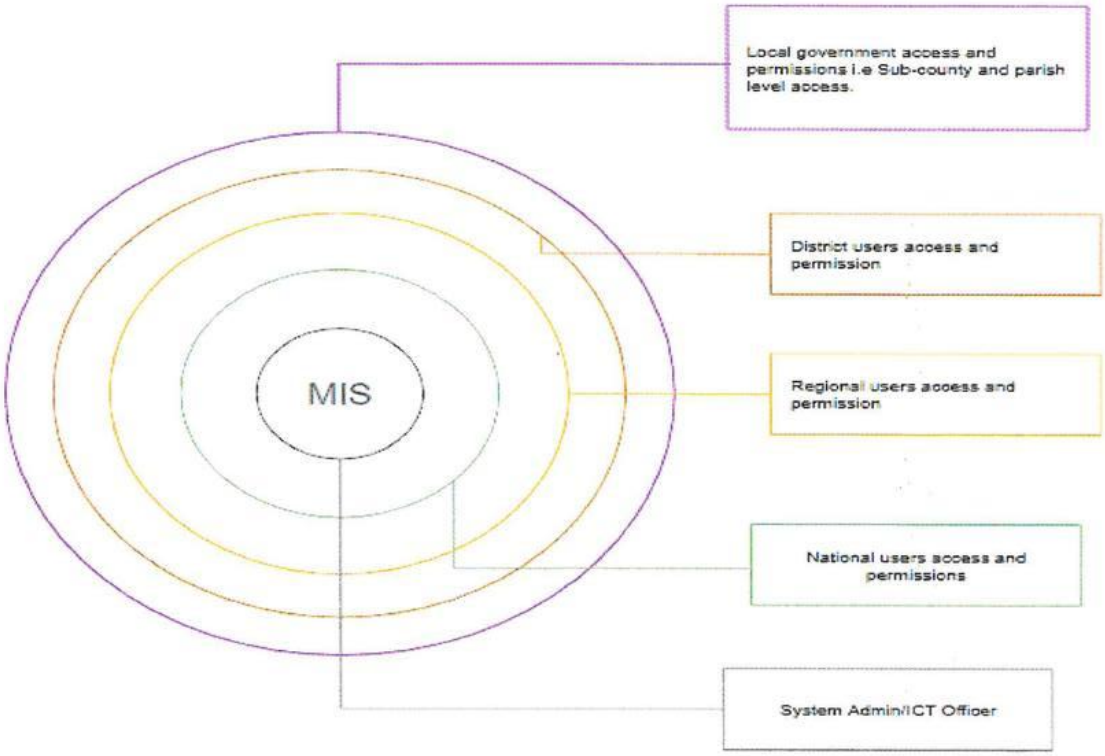


Figure 5. The overall technological layout of the GROW grievance Module

5.2.3. Information Input and Management

The GRC secretaries (GROW focal point officers) are authorized to enter information on new cases as and when they receive them. Other members of the GRC across the program shall be responsible for updating the handling process and updating the MIS. Updates of information shall include the upload of documents in line with the grievance being handled where applicable. Viewing and accessing information will be tiered according to the level of involvement. For example, GRCs will only have access to information pertinent to their specific level, whereas national-level leadership will have the capability to view and access information across all implementation areas.

5.2.4. Activities to be undertaken in the MIS GRM Module.

The table below describes the activities to be undertaken in the MIS GRM module.

Table 10. GRM-MIS Activities

Sn	Action	Description
1.	Grievance Submission	• Allow stakeholders to submit grievances online through a user-friendly interface • Classifies grievances based on type, severity and urgency
2.	Grievance tracking	• Track the status of each grievance form submission to resolution • Sends automated notifications to relevant parties about updated and required actions
3	Investigation and resolution	• Assign grievances to appropriate personnel or committees for investigation • Records investigation findings, actions taken and resolutions.
4	Data management	• Safely stores grievances-related data • Ensures data is automatically synchronized across all levels (national, district, city, municipality and division)

Sn	Action	Description
4.	Reporting and analysis	• Produces detailed reports on grievance trends, resolutions and system performance • Analyses grievance data to identify patterns, common issues and areas of improvement.
5.	Feedback and follow-up	• Collect feedback from stakeholders on the grievances handling process and outcomes • Monitors the implementation of resolutions and follow-up actions to ensure grievances are satisfactorily addressed.
7.	Escalation	The systematic process for escalating a complaint or concern to higher levels of authority when it cannot be resolved at its initial level ensures accountability, transparency, and fairness in addressing issues. Here's how it shall work • The receiving level selects an option to escalate the case within the system. • This provides access to all upper levels of grievance handling, showing the names of designated persons. • Notifications are sent via email or SMS to the responsible person. • The designated person accesses the MIS, accepts the escalation, and becomes responsible for updating the progress of the case in the MIS. This process ensures that all grievances are handled efficiently and effectively at the appropriate level.
8.	Referral	Referral shall involve directing a case to the appropriate entity without handling it directly, similar to dispatching. It shall include: 1. Internal Referral: • A higher-tier GRC sends a case to a lower-tier GRC for initial consideration. • The designated GRC secretary receives a notification to handle the case. 2. External Referral: • Cases that need to be addressed by external entities, such as the police for criminal matters, are indicated in the system. • The referring GRC follows up and updates the MIS, as the external entity may not have access to the system. This process ensures efficient and proper handling of grievances.

5.2.5. Functional Specifications of the GROW- GRM Module

Functional specifications define the system's capabilities, user interactions, workflows, and technical requirements. This includes inputs, processes, outputs, and integrations with other systems. Functional specifications serve as a blueprint for developers, designers, and stakeholders to ensure the system meets its intended purpose and user needs while maintaining consistency, usability, and efficiency. The table below entails the information on the module functions.

Table 11. GRM MIS Component Description

S/n	Component	Sub-component	Description
1.	User interface	For administrators (MGLSD. PSFU & Local Government level)	Dashboard view, summarized data on grievances received, pending, resolved, and escalated among others. Complaints management, tools to categorize, prioritize, and assign grievances to relevant departments or entities. Report and analytics, statistical insights, performance metrics and trends in grievances categories. Update tools, provision to add notes to a grievance being handled for updates on the progress. Escalation matrix, automatic and manual escalation and referral features based on predefined rules or timelines

S/n	Component	Sub-component	Description
2.	Function modules	Grievance Submission	User identification, option for anonymous or registration submission Categorization, selection of grievance categories, such as fraud & corruption, general, etc. Attachment support, upload of supporting documents or images
		Complaint tracking and management	Workflow automation automatically routes grievances to relevant teams or individuals. Priority handling, labels for critical issues to ensure expedited resolution. Timeline tracking, log timestamps for submission, acknowledgement, updates and closure.
		Resolution and feedback	Action history, detailed audit trail of all actions taken on a grievance. Feedback collection, simple post-resolution survey to assess user satisfaction.
		Escalation and notification	Alerts and reminders, timely notifications for pending or overdue actions. Escalation tiers, automatic escalation to higher authorities if not resolved within the stipulated time.
		Reports and analytics	Customizable reporting, generate reports based on timeframe, departments, or complaints. Data visualization, charts, graphs and heat maps for easy interpretation. Trends analysis, identify recurring issues or bottlenecks in grievance handling.
3.	Security and Compliance	Scalability	Handle increasing user numbers and complaints without performance interference.
		Customizable interface	Tailor categories, workflow and notifications to specific reporting tiers.
4.	Deployment and maintenance	Cloud-based	Option for deployment based on organizational infrastructure.
		User training and documentation	Detailed manual, training sessions and FAQs for smooth adoption.
		User support	Dedicated support for troubleshooting and system updates.

The data capture screen shall be designed as follows in line with the functions above:

The data capture module will feature drop-down menus for the category of grievances/complaints, making data entry easy and efficient. Its design will closely mirror the physical grievance/complaints form to simplify data entry. All data entered will be automatically validated by the system, ensuring accuracy and preventing errors. For example, data on grievances or complaints cannot be posted to future periods. Users will follow the logical flow of the

grievance/complaints form, with each field corresponding to the electronic capture screen for seamless data entry.

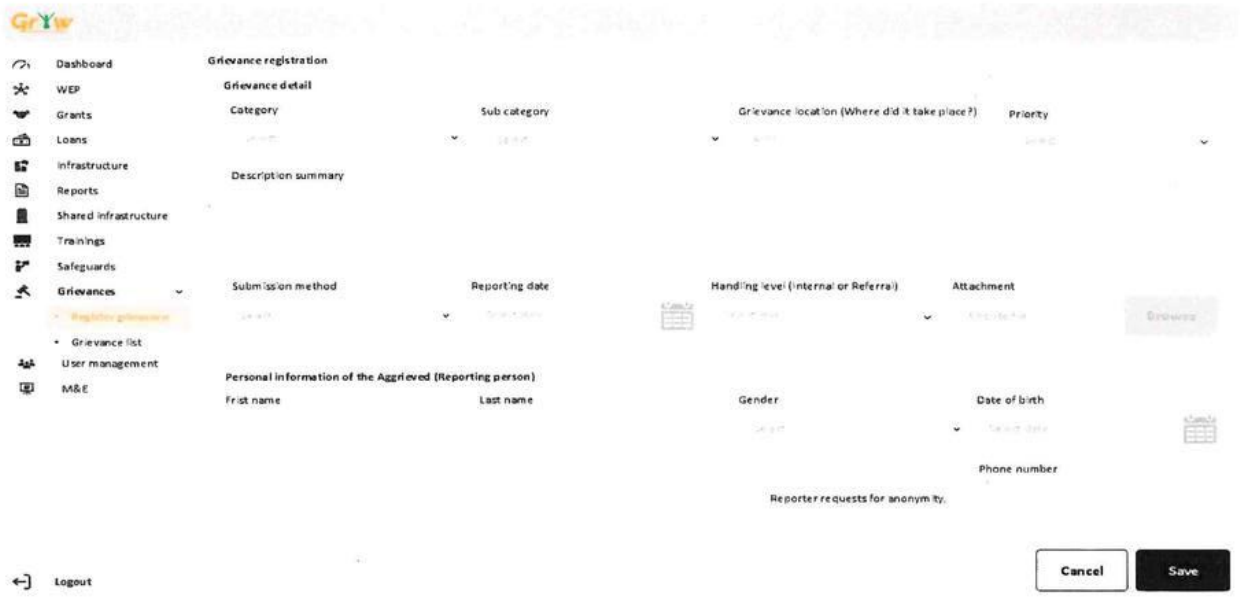


Figure 6. Electronic system - based grievance data entry screen

The search module will enable the GRC secretary to search grievances by Case Number. Each grievance link will provide access to the complete history of how the grievance was handled. To maintain confidentiality and privacy, all searches of beneficiary details or case history will be logged in the MIS as part of the audit log for any necessary reference

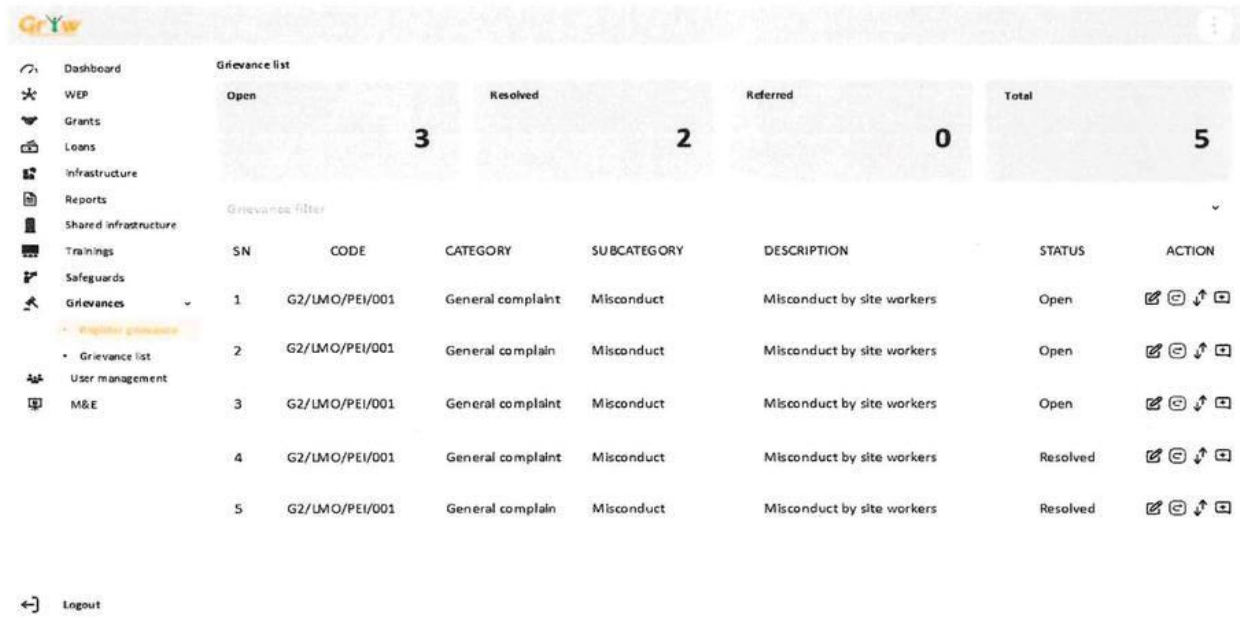


Figure 7. Screenshot of complaints search screen

5.2.6. System Reporting

The GRM-reporting module shall include and not limited to the following:

a. Summary statistics for grievance by type, location

b. Grievances not acted upon within a stipulated service standard.

c. Number of complaints, disaggregated by type of grievance
d. Number of complaints by vulnerability status (gender, disability, refugee etc)
e. Number of grievances registered through the different channels
f. Number of requests for information by type of information request;
g. Number of grievances/complaints resolved within the National, District, city, municipality or division, and timeline (for the Helpline and the Complaints Forms);

Overall data will be disaggregated by, date, location, Gender, Vulnerability category, grievance category, sub-category, and geographical areas among others.

5.2.7. Module Development Approach

The GRM module within the MIS design approach is in line with the objectives of the grievance Mechanism design. This approach consists of two main processes (interlocked by iterative prototyping, which simply means the full involvement of the users in the development of the MIS) that consist of several sub-processes:

- Design processes involving the documentation of user requirements to build the GROW-GRM-MIS prototype.
- Implementation processes entail the training of users at MGLSD & PSFU, District, City, Municipality, Division, Sub-county and Parish levels on the grievance module.

5.2.8. Prototype to Implementation

The grievance module prototype will be developed and refined multiple times in collaboration with users and stakeholders, incorporating their feedback throughout the process. The figure below shall therefore guide the Software development.

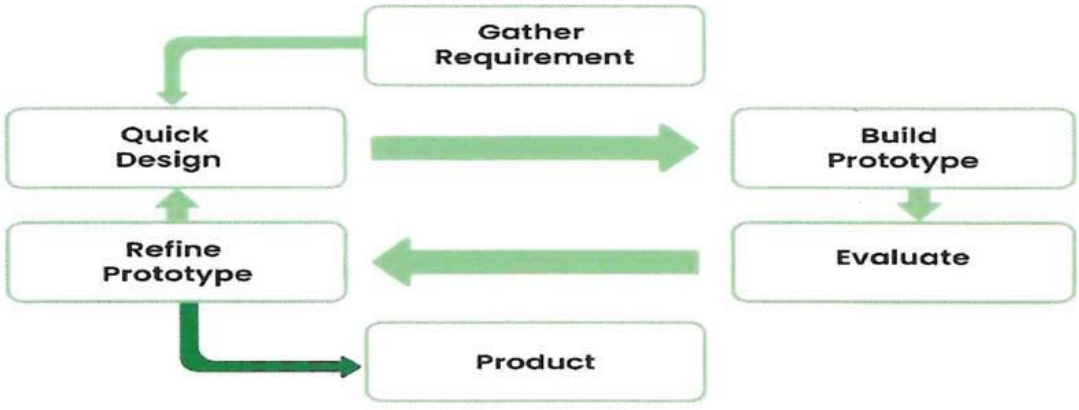


Figure 8. GRM module development approach

5.2.9. GROW-MIS GRM Security

The module will include an inbuilt security feature. All users of the GRM-Module within the GROW-MIS will be defined, and role-based profiles will be assigned specific function rights. Users will need to provide a valid password to log in. Once logged in, their user profile will grant access

to modules based on their assigned rights. Below is a sample segregation of the duties control matrix for the grievance module:

Table 12. Segregation of duties matrix for the complaints module

S/n	Role	Access level
1.	Social Development Specialists (MGLSD & PSFU)	Full access to all functions
2.	GRC secretary (district, city, municipality & division)	Access to data entry function Access to case management and updates on grievance management with respective jurisdiction.
3.	Data entry clerks	Access to data entry functions
4.	Reviewer	Access to review and approve grievances
5.	Auditor	Access to audit logs and history

6.1. GRM Monitoring and Evaluation

To systematically track implementation, output and measure the effectiveness of the GRM for GROW PROJECT, a robust monitoring and evaluation framework has been established. This framework enables the implementing team to determine precisely when the grievance redress mechanism is on track and when adjustments may be necessary. To ensure unbiased information collection, the GRM implementing team and associated structures will receive support from the GROW M&E department, following designated indicators. This approach ensures that beneficiaries and other stakeholders interacting with the GRM feel free to provide honest feedback, leading to a balanced assessment of the mechanism's impact on beneficiaries and the overall GROW Project.

6.1.1. GRM Monitoring and Evaluation Framework (Indicators).

Period	Objectives	Indicators
Quarterly review of quantitative indicators	• To assess if grievances including GBV related are correctly screened and classified. • To assess if suggestions and comments are properly classified • Identify trend in grievances. • To know grievances being addressed. • Assess complainant satisfaction rate of GRM • Assess the number of GBV related grievances referred	• No. of grievances including GBV related received by level and type, gender, vulnerability status and age • No of grievances addressed by level and type. • Repeat of grievance by the same stakeholder. • Repeat of grievance from different stakeholders. • Time frame for closure of grievance by type and level. • No. of comments accepted and corresponding actions taken. • No. of suggestions received and accepted. • No. of complainants satisfied with the redress process • No. of GBV cases referred within 24-72 hours
Annual review of grievance redress mechanism	• To assess compliance with GRM. • To evaluate progress with achieving results. • To identify improvements and update grievance handling and redressing procedures.	• Compliance with GRM process • Completeness of grievance log and register. • No. of grievances received by level and type. • No. grievances resolved. • No. of appeals received. • No. of appeals resolved. • Qualitative assessment of stakeholder awareness of the GRM. • No. of comments and suggestions accepted.

Figure 9. GRM M&E framework (Indicators)

Annexes

Annex 1: GRM Implementation Plan

Activity	Indicators	Timelines	Responsibility
Training staff at MGLSD on GRM including principles of managing GBV/SEA/SH grievances using survivor centered approach	No. of training sessions undertaken.	Quarterly	MGLSF
Training staff at PSFU on GRM including principles of managing GBV/SEA/SH grievances using survivor centered approach	No. of training sessions undertaken	Quarterly	PSFU
Training District Technical team on the GRM including principles of managing GBV/SEA/SH grievances using survivor centered approach.	No. of training sessions undertaken	Quarterly	MGLSD and PSFU
Sub regional Training of the Grievance Redress Committees on the GRM	No. of training sessions undertaken	Quarterly	MGLSD and PSFU
Training of RWCs in 13 refugee settlements and dissemination of GRM tools	No. of training sessions undertaken	Quarterly	MGLSD and PSFU
Training on the GRM – Service Providers	No. of service providers trained	Quarterly	MGLSD, PSFU and Focal point Officers
Train PFI GRCs in grievance management including principals of SCA in managing GBV/SEA/SH.		Quarterly	MGLSD and PSFU
Regional Sensitization and Awareness creation on the GRM – Women Entrepreneurs	No. of awareness creation activities undertaken	Monthly	MGLSD, PSFU and Focal point Officers
Training on the GRM- contractors	No. of contractors trained and adopting GRM	Monthly	MGLSD, PSFU and Focal point Officers
Production and printing of GRM Handbook, Register and forms	Tools disseminated to the grievance officers.	Quarterly	E&S team MGLSD
Completion of the integration of the GRM-MIS module into the project MIS	Operational GRM Module in the Project MIS. Number of reports generated.	Quarterly	E&s team & ICT department

Activity	Indicators	Timelines	Responsibility
Dissemination of the GRM handbook	No. of dissemination meetings	one off	E &S team MGLSD
Facilitate GRC meetings at the local government level	No of grievance resolved during GRCs meetings	Adhoc	E&S team MGLSD and PSFU and Focal point Officers
Hold radio talk shows on the GRM	No. of radio talk shows held on the GRM	Monthly	E&S team MGLSD and PSFU and FPOs
Support supervision and monitoring of performance of GRCs	No. of supervision and monitoring visits meetings conducted.	Bi annual	DISTs and PIST E&S team MGLSD and PSFU
Procurement of consultant to undertake Periodic GRM audit	No. of periodic audits undertaken	Annual	Independent consultant

Annex 2: Grievance Registration Form

The Republic of Uganda
MINISTRY OF GENDER, LABOUR, & SOCIAL DEVELOPMENT

THE WORLD BANK
IBRD • IDA | WORLD BANK GROUP

Enterprises for Women

Complaints/Grievance Registration Form

Code No..... Date.....

Name of Complainant(s)..... *(Optional/Anonymity is acceptable)* Address of Complainant *(Physical and Contact)* ..... Gender: Male / Female *(Tick as appropriate)* Category of grievance (Refer to standard categorization in log book) .....
Brief description of grievance/complaint/issue/comment, location and effects:
What is the perceived cause?
Suggested action (By complainant) to address grievance
Complainant's sign or fingerprint .....
Receiver and Recorder of issue/complaint ..... Name..... Title..... Signature.....Date.....
For official use only: **Priority:** Low, Medium, High **Severity**: Low, Medium, High (*Tick).*

Annex 3: Grievance Register

The Republic of Uganda
MINISTRY OF GENDER, LABOUR, & SOCIAL DEVELOPMENT

psfu
Business growth is our business

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GrOW
Enterprises for Women

GRIEVANCE LOG BOOK

District: ..... Sub County/Settlement: ..... CODE: .....

No.	Date	Complainant(s)' Name (Optional)	Address/Contact details (Optional)	Gender M/F	Category of Grievance	Brief description of grievance, location and effects.	Status of grievance (Open, Pending, Referred, Rejected, Resolved).	Date of response	Action Status and brief description of response	Remarks

Annex 4: Revised Categorisation of Grievances under GROW Project

Category	Sub Categories	Responsibility / Remarks.
General Complaints	• Exclusion from project opportunities • Delayed disbursement of grant and loan funds • Exorbitant fees to access services • Poor working conditions for site workers • Delayed payment of service providers • Delayed payment of site workers' wages • Delayed or failed to pay for services and good sourced from community-based members. • Misconduct by site workers • Damage and effect on community assets / resources • Others as applicable in a specific location	• Designated GROW Officers and Structures.
Gender based violence (GBV)/Violence against Children (VAC)/SEAH	• Sexual Harassment of any form due to project activities against beneficiary women entrepreneurs or any stakeholder • Violence of any form due to project activities against beneficiary women entrepreneurs or any stakeholder (Physical, emotional, psychological, sexual and economic) • Domestic violence induced by project activities • Violence of any form against children due to project activities (Neglect, sexual, bullying, psychological aggression, corporal punishment, child labour, assault, denial to child development services such as education) etc. • Rape • Female Genital Mutilation • Denial of access to economic opportunities • Others as applicable in a specific location	• Designated GROW Officers and Structures. • Referrals to Relevant government structures / institutions (Police, State Attorney, Magistrate, Health Centres), etc.
Discrimination and Exclusion	• Discrimination from project processes and opportunities on basis personal characteristics (Gender, nationality, ethnicity, age, social status, sexual orientation, political affiliation, religion, disability, geographical location) • Exclusion from project processes and opportunities on basis personal characteristics (Gender, nationality, ethnicity, age, social status, sexual orientation, political affiliation, religion, disability, geographical location) • Others as applicable in a specific location	
Incidents	• Occupational Health and Safety incidents (Lack of PPE, Increase and prevalence of communicable diseases, Poor waste management and disposal, hazardous wastes, poor housekeeping, injuries, lack of OHS Plan, Criminal attacks, permanent disability, assaults and Fatalities. • Social Incidents (Mistreatment, Sexual Harassment, Impact on Community Assets/Resources, Damage to PCR, Inadequate Community Consultations / engagements, Violent protests/unrest, abuse of the vulnerable, trafficking and Child Labour	• Designated GROW Officers and Structures. • Referrals to Relevant government structures / institutions (Police, State Attorney, Magistrate, Health Centres) etc.

Category	Sub Categories	Responsibility / Remarks.
	• Environment incidents (Pollution, hazardous wastes, Improper use of chemicals, contamination destruction of habitats and ecosystems.	
Fraud and Corruption	• Charging informal fees • Extortion • Nepotism • Bribery • Influence peddling • Provision of incorrect information by beneficiaries • Double / multiple payment of project services/resources • Others as applicable in a specific location	• Designated IG Officials and structures. • IG • State House Anti-Corruption Unit • Police