



**GOVERNMENT OF SOMALILAND**

**SOMALILAND ELECTRICITY SECTOR RECOVERY PROJECT (P173088)**

**MINISTRY OF ENERGY AND MINERALS (MoEM)**

**GRIEVANCE REDRESSES MECHANISM (GRM) FOR SOMALILAND  
ELECTRICITY SECTOR RECOVERY PROJECT (P173088)**

**FEBRUARY 2022**



## **LIST OF ABBREVIATIONS:**

<b>AP:</b>	Aggrieved Party Affected Persons
<b>BESS:</b>	Battery Energy Storage Systems
<b>BSSF:</b>	Business Support Services Firm
<b>CSR:</b>	Corporate Social Responsibility
<b>ESF</b>	Environment and Social Framework
<b>ESI</b>	Electricity Supply Institutions
<b>ESMF:</b>	Environmental and Social Management
<b>ESMF:</b>	Environmental and Social Management Framework
<b>ESPs:</b>	Electricity Service Suppliers Providers
<b>ESS:</b>	Environmental and Social Standards
<b>GOSL:</b>	Government of Somaliland
<b>GBV:</b>	Gender Based Violence
<b>GIR:</b>	Grievances Investigation Report
<b>GIS</b>	Geographical Information System
<b>GRC:</b>	Grievance Redress Committee
<b>GRM:</b>	Grievance Redress Mechanism
<b>GRS</b>	Grievance Redress System
<b>HIV</b>	Human Immunodeficiency Virus
<b>MoEM</b>	Ministry of Energy and Minerals
<b>NGO</b>	Non-Government Organizations
<b>PIU:</b>	Project Implementing Unit
<b>SEA:</b>	Sexual Exploitation and Abuse
<b>SESRP:</b>	Somaliland Electricity Sector Recovery Project
<b>SME:</b>	Small and Medium Enterprises
<b>SOPs</b>	Standard Operating Procedures
<b>WB</b>	World Bank

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# 1 INTRODUCTION

## 1.1 Project background and Context

A Grievance Redress Mechanism (GRM) is an instrument through which dispute resolution is sought and provided. It involves the receipt and processing complaints from individuals or groups negatively affected by activities of the Somali Electricity Sector Recovery Project (SESRP).

Government of Somaliland (GOSL) is preparing the Somaliland Electricity Sector Recovery Project (SESRP) for appraisal. SESRP aim is to increase access to electricity services and to re-establish the Electricity Supply Industry (ESI) in the Project Areas. The federal MINISTRY OF ENERGY AND MINERALS (MoEM) which hosts the Project Implementing Unit (PIU) is responsible for defining and implementing overall energy sector policies and to regulate the sector. .

The Project Development Objective is to increase access to electricity services and to re-establish the electricity supply industry in the Project Areas.

## 1.2 Project Components

This project will support improved the establishment of interconnected distribution systems in and the establishment of Greenfield sub-transmission lines of 132 kv in the major load centres of Hargeisa. In addition, the project will support the hybridization of generation capacity in Major Load Centres within large cities and towns (Hargeisa, Berbera, Borama, Burao, Erigavo and Las-Anod) identified for renewable generation optimization; and will provide benefits from improved health and education services.

**Component 1 – Distribution network reconstruction, reinforcement and operations efficiency in the major load centers.** The proposed activities include sub-transmission and distribution network reconstruction and reinforcement in the major load centers to improve network reliability and operational efficiency by integrating the current ESPs’ distribution networks and existing generation in order to optimize overall distribution network operations.

**Component 1-A. Generator Synchronization and Automation.** Currently, most of the Electricity Service Providers (ESPs) have not implemented synchronization and automation as part of their generation processes. As a consequence, separate generator units are connected to exclusive feeder lines and as result, many generators operate below their expected optimal performance criteria. Further, the absence of automation and synchronization, prevents the ESPs from utilizing parallel generation to assure optimal generator performance and dynamic reactivity to electricity load variations. This kind of operation results in significant amounts of “wet stacking” (diesel fuel waste, extra pollution, and performance degradation). Proposed investments under this component will support equipment supply and installation that will enable synchronizing and automation of the numerous generators presently in operation. The application of automation and synchronization to the numerous generators in each of the targeted major load centers will provide reduced cost of generation accruing from augmentation in generation capacity and reduced wet stacking; fuel consumption and maintenance costs.

**Component 1-B. Sub Transmission and Distribution network integration in the major load centers.** All of the ESPs operate independently and, as a consequence, there is significant infrastructure duplication. The proposed activities will support investments in the sub-transmission and distribution network infrastructure required to enable generation synchronization in addition to increased network capacity and reduced network losses.

**Component 2 – Renewable energy generation optimization.** This component is proposed to support activities aimed at the hybridization and optimization of existing mini-grids. It will support installation of Battery Energy Storage Systems (BESS) and solar PV systems at existing diesel-based generation stations. This component aims at increasing the efficiency of the existing hybrid mini grids (diesel and solar) by optimizing the existing generation capacity and where possible reduce the diesel consumption by augmenting the installed capacity with BESS and additional solar PV generation.

**Component 3 – Electricity services for improved public services delivery (Health, Education and Water Supply Institutions).** This component will support activities to provide electricity to existing public facilities in rural and peri-urban areas, underpinned by the nationwide geospatial plan. The Geographical Information System (GIS) analysis will include climate risks to identify vulnerable load centers/households and identify risks to sustainability of the electricity services. Key activities under this component are proposed to include new hybrid mini-grids and standalone solar PV systems augmented by BESS targeting public institutions as the anchor loads and where viable associated distribution network to connect other loads such as Small and Medium Enterprises (SMEs) and households. Besides playing a key role in enablement of community co-benefits, facilities that have access to electricity may be better positioned to attract and retain skilled workers, especially in rural areas. Further, this will equip public service institutions to better respond to emergencies, such as COVID-19.

The proposed activities under this component support the resilience of the Somaliland population from the conflict's impact on livelihoods through improved access to functional basic services, such as health facilities, schools and clean water supply. Further, it would also strengthen the Government of Somaliland (GOSL) state legitimacy before its citizens through the delivery of the "social contract". The activities are proposed to retrofit existing public infrastructure facilities with electricity services and support the establishment of a cross sector energy infrastructure program to ensure that new facilities are equipped with electricity infrastructure.

**Component 4 - Sector Capacity Enhancement and Project Implementation Capacity Support.** The proposed activities include (a) strengthening of sector governance and regulation to foster autonomy, accountability and transparency. The process of reestablishing the

Electricity Supply Institutions (ESI) and integrating infrastructure network operations will require a mix of planning and monitoring and, in particular, national skill set advancement and institutional entities. This will also require having in place appropriate regulations, standards, safety and technical performance requirements. These standards will require all ESPs to improve technically and provide better operations within a levelled and regulated marketplace. This component will include technical assistance aimed at enhancing the ESI capacity with regards to sector policy, regulation, planning, management and operations, among others; (b) undertaking sector integrated planning including Sector Least Cost Development Plan covering generation, transmission and distribution (which will include a low-carbon scenario) and Electricity Access Strategy and Investment Prospectus. The sector plans will enable having a sector wide development framework that will enhance crowding-in funding, both private and public; and (c) project implementation support. The technical assistance to enhance the ESI institutional capacity would initially support and guide the day-to-day sector undertakings through a Business Support Services Firm (BSSF) approach.

The World Bank assisted projects ensures a forum for people adversely affected to voice their concern and seek solutions to their problems. The federal MINISTRY OF ENERGY AND MINERALS (MoEM) has to create enabling environment/system to accommodate any unanticipated environmental or social risk and impact arises during the implementation in line with the country and WB environmental and social safeguard standards. Therefore, the Grievance redress mechanisms (GRM) have to be established within the project ambit.

**Grievance** may refer to any complaint, concern, injustice, wrongdoing, accusation related to the project implementation. It also includes queries, suggestions and comments.

### 1.3 Grievance Redress Mechanism (GRM)

Is a set of specified procedures for revealing, assessing, methodically addressing grievances or complaints and resolving disputes and monitoring? It is a mechanism whereby queries or clarification about a project are responded to systematically, problems that arise out of implementation are resolved and grievances are addressed efficiently and effectively.

This GRM provides a predictable, transparent and credible process to all parties, resulting in outcomes that is fair, effective and lasting. This GRM will provide benefits to both the project and the Affected Persons (AP) as listed on Table 1.1:

**Table 1.1: Benefits of GRM**

<b>Benefits to Projects</b>	<b>Benefits to AP and other stakeholders</b>
<ul style="list-style-type: none"> <li>• Provides information about project implementation</li> <li>• Provides an avenue to comply with government policies</li> <li>• Provides a forum for resolving Grievances and disputes at the lowest level</li> <li>• Resolves disputes relatively quickly before they escalate to an unmanageable level</li> </ul>	<ul style="list-style-type: none"> <li>• Provides a cost-effective method to report their grievances and complaints</li> <li>• Establishes a forum and a structure to report their grievances with dignity and access to a fair hearing and remedy</li> </ul>

<ul style="list-style-type: none"> <li>• Help win the trust and confidence of community members in the project and creates productive relationships between parties</li> <li>• Ensure equitable and fair distribution of benefits, costs and risks</li> <li>• Mitigates or prevents adverse impacts of the project on communities and produces appropriate corrective or preventative action</li> <li>• Helps avoid project delays and cost increases, and improves quality of work .</li> </ul>	<ul style="list-style-type: none"> <li>• Provides access to negotiate and influence decisions and policies of the project that might adversely affect them</li> <li>• Facilitates access to information</li> </ul>
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### 1.3.1 GRM Principles

In accordance with World Bank ESF, the proposed GRM covered the following principles:

- **Accessibility:** The GRM will be accessible to everyone affected by the project. It will be available to provide assistance to those who face barriers such as language, literacy, awareness, cost, or fear of reprisal.
- **Predictability:** The GRM has offered clear procedures with time frames for each stage and clarity on the types of results it can and cannot deliver.
- **Transparency:** The GRM will operate in such a way that it is easy for others to see what actions are being performed. This will be undertaken through disclosure of all information to the public and affected people.
- **Credibility:** The performance of the GRM will enable affected people to accept and believe that the mechanism works, delivers results and is honest.
- **Fairness:** The GRM procedures will be perceived as fair, especially in terms of access to information, and opportunities for meaningful participation in the final decision. Its outcomes should be consistent with applicable to national standards and should not restrict access to other redress mechanisms.
- **Feedback:** The GRM will serve as a means to channel citizen feedback to improve project outcomes for the people.

### 1.3.2 Objectives of the GRM

The following are the objectives of establishing SESRP GRM;

- I. To address complaints and grievances and enhance conflict resolution arising from, and during SESRP project implementation.
- II. Ensure transparency and accountability throughout the implementation of projects and programmes amongst the relevant stakeholders including project beneficiaries.
- III. Resolve any emerging environmental and social grievances in project areas.
- IV. To promote relations between the project implementers, executers and beneficiaries.

### **1.3.3 Scope of the GRM**

The SESRP GRM provides a channel for dispute resolution during the implementation of programs. However, the GRM serves to complement but not replace the existing legal channels such as courts, tribunals and other recourse mechanisms for addressing grievances.

The GRM is designed to improve project outcomes by creating public awareness about the project and its objectives, deterring fraud and corruption, mitigating socio-economic and environmental risks and providing the SESRP coordinator with practical suggestions and feedback during program implementation.

The targeted audience for this GRM will range from the funding body, project beneficiaries and their related institutions. This GRM will be robust enough to address conflicts and complaints across the above-described scales.

## **2 POTENTIAL GRIEVANCES**

The SESRP is designed to bring about positive social impacts like improved well-being of community members through provision of access to constant electricity and providing livelihood security for the overall populations in targeted areas. Though private sector driven, in the course of actualizing these noble objectives, it is anticipated that, among other likely issues, subprojects under Components 1 and 3 (Component 1: Solar Hybrid Mini Project components will lead to the acquisition of land and various construction and installation activities, which could result in displacement of persons, restriction of access or loss of livelihood. if improperly managed components 1,2, and 3 could lead to complaints and grievances from the end users or misunderstandings between the Energy Access companies and all relevant parties in the project.

The project activities will include the installation/ construction of Mini Grid Systems, which are likely to have both temporal and permanent effects. Permanent effects will result in a loss land by the affected persons. Temporal effects will result to interruption in the current use of property or temporary loss of access to land as a result of the subproject activities. These are likely to occur during construction and rehabilitation of existing infrastructure.

Selected Mini Grid developers are expected to lead the land acquisition drive in their earmarked sites but would be strictly required to adhere to the SESRP GRM. Although parties consulted during the cause of this exercise expressed appreciation and longing for the project, this does not eliminate the fact that people will be displaced, or their livelihoods interrupted. Therefore, displacement of people within the project areas is expected although it is not possible to determine the number of people that are likely to be impacted just yet. Other grievances are likely to come up in the following cases, or as a result of the following activities/ inactivity:

- Environmental concerns due to presence of batteries and other equipment or waste management (e.g. battery disposal),
- Non-inclusion of community members in paid labor/ workforce,
- Non-inclusion of community members in decision regarding design of the Mini Grid, its operation and billing process,
- Existing political divisions in different levels of the GOSL (center vs. periphery) communities and the consequent perception of project citing as more favorable to one divide,
- Unrealistic Corporate Social Responsibility (CSR) expectations from the contractors by community members,
- High cost of services e.g. community members are usually required to pay a one-off ‘connection fee’ covering cost of a breaker and cables to connect power from poles to the user’s house or business premise.
- Conflicts arising from users by-passing meters to use free electricity,
- Prolonged downtime in electricity supply due to faulty equipment,
- Delay in execution of project leading to breakdown of trust e.g. delay in take-off after contractor has mobilized equipment to site,
- Disruption of public access and disturbance resulting to loss of business days and associated income,
- Disagreements over product warranty,
- Accidents or injuries due to construction
- Potential risk of social conflict with communities as a result of labor influx, including forms of Gender Based Violence (GBV)/ Sexual Exploitation Assault (SEA), and

- Equipment installation e.g. poles and cables running through or above homes and other privately owned properties.

### **3 LEGAL, POLICY AND LEGAL FRAMEWORK**

#### **3.1 Constitutional:**

##### **The Provisional Constitution 2022:**

- In terms of land tenure, (Law No. 12) of the constitution states that every person has the right to own, use, enjoy, sell, and transfer property” and that property will not be expropriated unreasonably.
- Article 34 provides guidelines on environmental and social safeguards that can be observed.
- Article 34 (in Chapter of - Land and duties of the citizen, Property and Environment) exhorts “all people in ... Somaliland” to “participate in the development, execution, management, conservation and protection of the natural resources and environment.”.

#### **3.2 Policy:**

- **Energy Policy:** In terms of energy related environmental issues, inclusivity of communities, corporate social responsibility, cost affordability, quality related issues.
- **Environmental Management Policy 2015 approved council of ministries:** In terms of environmental management and environmental protections

#### **3.3 Legislative:**

- **Somaliland National Labor Code”** (Law Number 97/2022) is the specific labor law governing all aspects of labor and working conditions, which covers the contract of employment, terms and condition, remuneration, occupational health and safety, trade unions and labor authorities.
- **The Somali Civil Code 1973:** In terms of conflicts arising from users bypassing meters, conflicts over damage claims or arising from injuries due to constructions and equipment installation.
- **The Penal Code 1962:** In terms of issues related to Gender Based Violence, exploitation and assaults.
- **The Electricity Act:** In terms of Corporate Social Responsibility (CSR), service costs, supply downtime, quality issues and equipment installation.

#### **4 THE SERSP GRIEVANCE REDRESS MECHANISM**

The grievance mechanisms described here under include both complaints and grievances (hereinafter referred to only as ‘grievances’). Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local and project level.

As a project-based mechanism, the SERP GRM is taking into cognizance the components and the subcomponents of the project design as well as the culture of immediate environments of the proposed project sites. The mechanism will assume responsibility for occurrences and issues that have direct relation to the project or bearing on the activities that are being carried out for achieving the components and all the subcomponents of the project in the intervention sites. It must be noted that the SESRP GRM does not apply in any way to matters predating the project in project areas of influence.

Developing a GRM for the SESRP involved sets of activities. The first was to appraise the nature of project components and review the current situation of grievance handling in the APs locations, through a review of extant literature on the social and environmental contexts of the project and its various areas of influence. Already prepared policy documents for the project, such as the Environmental and Social Management Framework (ESMF) as well as laws, conventions and policies as they relate to development, especially World Bank projects were reviewed for this task. This was supported by consultations with relevant stakeholders, to reconfirm some of the findings in the literature as well as establish the variables that would determine the structure of the GRM and its key components.

The desk review established the socio-economic context of persons in the established project host communities and the un-established, as well as the legal and policy environment that necessitates the establishment of grievance redress mechanism for the project. Field consultations were done to appraise the prevalent situation around the project areas of influence, as well as to get understanding of the operational environment of the project that may arise.

##### **4.1 SESRP GRM Frameworks**

To ensure an effective operation of the GRM, potential grievances, tools for presentations and responding authority are classified according to the three project components on Table 1.1 below.

**Table1.1 Potential Grievances, Presentations and Responding Authority**

<b>Project Component</b>	<b>Project Intervention Activity</b>	<b>Potential Nature of Grievance</b>	<b>Tools of Presentation for</b>	<b>Ultimate Responding Authority</b>
<b>1</b>	<b>Distribution network reconstruction, reinforcement and operations efficiency in the major load centers</b>	<ul style="list-style-type: none"> <li>- Land related matters, e.g., poles and cables running through or above homes and private lands</li> <li>- Environmental concerns due to presence of batteries and other equipment</li> <li>- Waste management (e.g. battery disposal)</li> <li>- Gender based violence/ Sexual exploitation of locals as a result of labour influx</li> </ul>	<ul style="list-style-type: none"> <li>- Physical complaint,</li> <li>- Written petitions,</li> <li>- Official Emails,</li> <li>- Phone calls &amp; SMS to GRM hotlines,</li> <li>- Use of designated drop boxes</li> <li>- Channels for confidential and safe complaints for GBV/ SEA related Grievances</li> </ul>	WB, MoEM, PIU and ESPs,
<b>2</b>	<b>Renewable energy generation optimization.</b>	<ul style="list-style-type: none"> <li>- Supply of equipment considered by consumers as substandard</li> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>Physical complaint,</li> <li>- Written petitions,</li> <li>- Official Emails,</li> <li>- Phone calls &amp; SMS to GRM hotlines</li> </ul>	MoEM, PIU and ESPs
<b>3</b>	<b>Electricity services for improved public services delivery (Health, Education and Water Supply Institutions)</b>	<ul style="list-style-type: none"> <li>- Accidents or injuries to student or community</li> <li>- Gender based violence/ Sexual Exploitation as a result of labor influx</li> <li>- Security matters</li> </ul>	<ul style="list-style-type: none"> <li>Physical Complaint</li> <li>- Written petitions,</li> <li>- Official Emails,</li> <li>- Phone calls &amp; SMS to GRM hotlines,</li> <li>- Use of designated drop boxes</li> <li>- Channels for confidential and safe complaints for</li> </ul>	WB, Relevant ministries, PIU and ESPs

Project Component	Project Intervention Activity	Potential Nature of Grievance	Tools of Presentation	for Ultimate Responding Authority
			GBV/ SEA related Grievances	
4	<b>Sector Capacity Enhancement and Project Implementation Capacity Support.</b>	<ul style="list-style-type: none"> <li>- Gender based violence/ Sexual Exploitation as a result of labor influx</li> <li>- Land related matters</li> <li>- Security related matters</li> </ul>	<ul style="list-style-type: none"> <li>- Channels for confidential and safe complaints for GBV/ SEA related grievances</li> <li>- Physical complaint,</li> <li>- Written petitions,</li> <li>- Official Emails, Phone calls &amp; SMS to</li> <li>- GRM hotlines</li> </ul>	

Diverse methods for reporting grievances that are culturally appropriate are to be used and they should permit for self-identified, confidential, or anonymous procedures (professional letter writers, suggestion boxes, Email, toll-free telephone etc).

Avenues for verbal complaints are:

- Complaints to members of the local Grievance Redress Committee (GRC)
- Social Safeguards & Communications desks at the SESRP -PIU
- Open community mediation sessions
- Operators' Customer Care Unit
- Town hall meetings

Avenues for written complaints are:

- Complaint Boxes in the community, operator's office or by hand
- Letters or Email to the SESRP-PIU
- Dedicated telephone lines shall include:
- Community EUCS secretary and chairperson's telephone lines
- NEP-P PIU hotlines
- Operator Costumer Care hotlines

An email feedback system and 24/7-hour phones has been established and operationalized at the PIU.

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**WhatsApp:** +252634003534 /+252654003534

**Email:** [grm.sesrp9@gmail.com](mailto:grm.sesrp9@gmail.com)

#### 4.2 Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA)

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the grievance mechanism shall have a different and sensitive approach to GBV related cases and should be dealt with according to the complainant's informed consent. All complaints related to GBV shall be treated in a private and confidential manner, limiting

information to what the survivor or complainant is freely willing to provide. A separate register shall be opened for this category of cases and shall ONLY be accessed by the community based GRC, the GRM coordinator at the PIU. The complainant (if a survivor) shall be attended to with empathy, assurance of safety and confidentiality. If the complainant is not willing to divulge any information, this view should be respected by the GRM officer, and the complainant referred to the appropriate nearest medical Centre, approved available GBV service provider or police, depending on the complainant's choice. Such a complaint should be reported to the government's GRM channels as well by the PIU GRM officer.

All staff and GRM focal points should be informed that if a case of GBV is reported to them, the only information they should establish is if the incident involves a worker on the project, the nature of the incident, the age and sex of the complainant and if the survivor/complainant is referred to service provision. If a worker on the project is involved the incident should be immediately reported to the National Program Coordinator who will provide further guidance after consulting with the World Bank.

Other considerations for the handling of GBV/SEA grievances include:

No GBV data on anyone who may be a survivor should be collected without making referral services available to support them.

All GBV complaint should be referred to the right service provider and other relevant institutions, information to be requested should be limited to:

- The nature of the complaint (what the complainant says in his/ her own words without direct questioning)
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

Given to the sensitive nature of GBV Complaints, the GRM will provide different reporting channels to submit grievances including phone, text message and email which will be manned by the GBV Advisor. Although other entry points at the level will be identified including focal points.

At the Municipality /Local Government level, a Grievance Redress Committee (GRC) will be established and composed of local leaders, municipal representatives, the project, community-based organizations, Legal Aid and law enforcement agencies. A GBV focal point will be nominated from the GRC to support and refer GBV survivors to services available in the community, based on his/her consent, as per the GBV referral pathway all while maintaining confidentiality to protect the survivor.

Where the SESRP project worker has allegedly committed GBV/SEAH grievance, the case will be reported to the respective employing agency. The PIU GBV Advisor will follow up and determine jointly with a specially constituted "SEAH Committee", the GBV Advisor from PIU (MoEM (GOSL), NGO GBV service provider, and sub-contractors on the GBV/SEAH allegations related to the project. A standardized Grievance Registration Form will be used to register GBV/SEA/SH incidents (See Annex VIII).

Specific details on how the GRM will work will be spelt out in the GRM SOPs to be developed by GBV Advisor during project effectiveness that is, quarter 1 after signing of works contract.

All relevant staff of the PIU and IPs will receive training on receiving GBV complaints, survivor centered approach and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GM Operators will be trained on key protocols including referral, reporting and informed consent protocols and on the survivor centered approach to receive those cases in an appropriate manner and immediately forward it to the GBV/SEA/SH referral system. The GM Operator will ensure appropriate response by

- 1) Providing a safe caring environment and respect the confidentiality and wishes of the survivor;
- 2) If survivor agreed, obtain informed consent and make referrals,
- 3) provide reliable and comprehensive information on the available services and support to survivors of GBV

Possible channels that function as part of the two grievance mechanisms could include:

- For workers: independent helplines, an email address. It is important that these channels provide anonymity for the aggrieved persons.
- For service users or community members: feedback boxes, telephone/ hotline numbers etc.

The GM aims to support GBV Survivors by referring them to GBV Services Provider available in the community (this can be a local NGO already working on GBV, or the contracted NGO GBV service provider in the project location) for support immediately after receiving a complaint from a victim.

Support options to survivors may include the following:

- i) Medical support for incidents involving sexual violence, which may include treatments that need to be administered within 72 hours of the incident to be effective, such as:
  - Emergency contraception to prevent unwanted pregnancy
  - Post-exposure prophylaxis treatment to reduce the chances of HIV infection.
- ii) Psychological support for victims and witnesses, which may need to include trauma counseling for victims of sexual violence or harassment
- iii) Legal advice for victims, whistleblowers, witnesses and alleged perpetrators
- iv) Measures that support reintegration into the workforce (e.g. counseling)
- v) Child-protection support services and/or expertise for reports involving children.

NB: These multisectoral services may not be available in all the project areas and the contracted service provider/ other service providers may fill in the gaps in services. The project will aim to have the survivor accessing at least health and psychosocial services where services are scarce

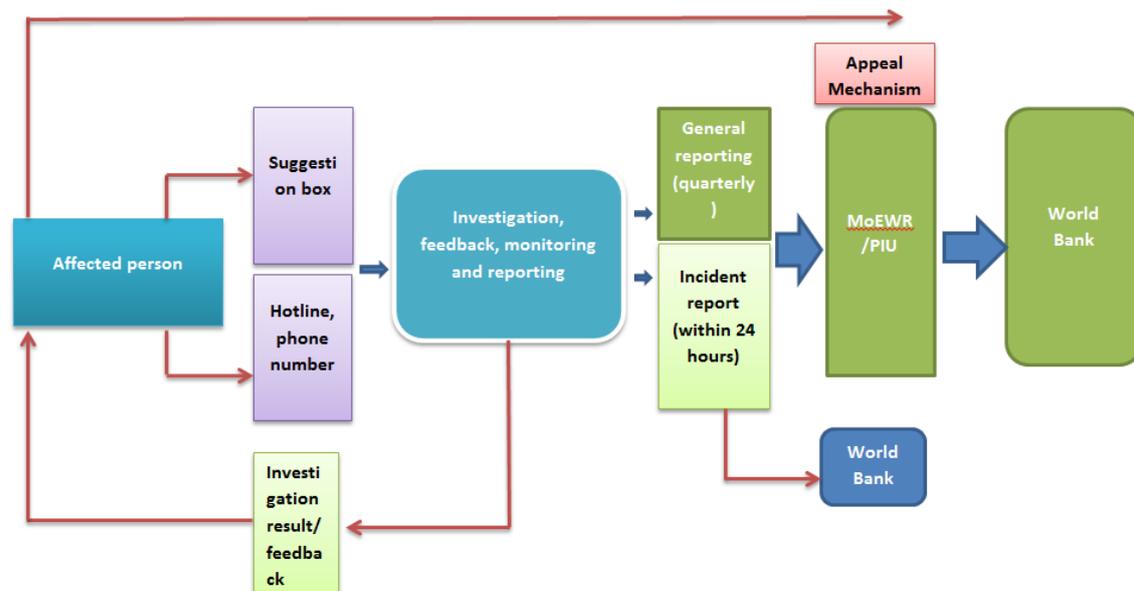


Figure 4-1: GBV Complaints to the PIU and World Bank

**PIU: Telephone:** +252634003534 / +252654003534

**WhatsApp:** +252634003534 /+252654003534

**Email:** [grm.sesrp9@gmail.com](mailto:grm.sesrp9@gmail.com)

**World Bank Somaliland Office:** If no satisfactory resolution of complaints has been received from the PIU, complaints can be raised with the World Bank Somaliland office on [Somalilandalerts@worldbank.org](mailto:Somalilandalerts@worldbank.org)

**World Bank Grievance Redress Service:**<sup>1</sup> If no satisfactory resolution has been received from the World Bank Country office, grievances can be raised with the World Bank Office in Washington. For more information: <http://www.worldbank.org/grs>, email: [grievances@worldbank.org](mailto:grievances@worldbank.org)

#### 4.3 IMPLEMENTATION STEPS FOR SESRP THE GRM

The SESRP GRM has been designed to provide a timely, responsive and effective system of resolving community groups or individual’s grievances in the areas the project is implementing activities. It is a process starting at the local, through the state administration to the federal level. It is a multi-stage process that ensures that all stakeholders from the community level structures to the National office are involved in finding solutions to the grievances raised by the communities the project is targeting. The project has fully operationalized the GRM and is managed by the project’s Social Safeguards specialists.

<sup>1</sup> <http://pubdocs.worldbank.org/en/440501429013195875/GRS-2015-BrochureDec.pdf>

All project affected persons will be informed of their rights to raise grievances pertaining to national GRM frameworks. Mechanisms are put in place to ensure that grievances are recorded and considered fairly and appropriately. Project management will issue and publicize a grievance redress policy that clearly states that management embraces grievance reports and views them as opportunities for project improvement and identified a guiding principle; defining the scope and types of grievances to be addressed; setting out a user-friendly procedure for lodging grievances; outlining a grievance redress structure; describing performance standards; and spelling grievance review mechanisms.

#### **4.3.1 STEP 1: IDENTIFYING FOCAL POINTS**

Staff in charge of grievance redress should be skilled and professional. Therefore, the SESRP management will identify high-calibre staff (Focal Points) at all levels of their projects and assign them responsibility for handling (receiving and registering) grievances. GRMs can have multiple focal points to receive and register grievances. This GRM is designed to give the aggrieved parties access to seek redress to their perceived or actual grievance using this mechanism or other existing mechanisms such as the National legal system (i.e. Courts), mediation boards (elders), GRCs and traditional systems (village courts). It is equally important to have someone who has overall responsibility for tracking and following up on issues and complaints raised. The descriptions of the GRM functions should clearly stipulate the official designations and the roles of the focal points so that they can really be held accountable for performing their functions. The GRM for the SESRP will have identified the focal point persons from community to national level and their tasks have been formulated.

At community level, the project grievance redress structure will be linked and interface to the existing traditional authority structure as this already provides for resolving conflicts in the communities. This will ensure accessibility to the GRM as the traditional structures are close to the people. The Focal Person will be someone with knowledge of the local and/or official language of communication and should be able to record the grievances where need be.

The Project will implement training program to teach staff, Focal Points, community members and other stakeholders how to handle grievances and why the GRM is important to the project's success. This training should include information about interacting with beneficiaries about grievances, the organization's internal policies and procedures in relation to grievance redress. It will also be useful to establish or build on local and community-based GRMs by providing grievance redress training for stakeholders at the local level. This greatly reduces GRM costs while enhancing beneficiary satisfaction with, and ownership of, the grievance redress process.

#### **4.3.2 STEP 2: REGISTRATION OF GRIEVANCES**

A register of grievances which will be held by the GRM Officer or any other appointed person by the project. The Aggrieved Party (AP) must register their grievances with the GRM focal point.

To register the grievance, the AP will provide information to the GRM focal point to be captured in the Grievances Registration Form (**Annex 1**). The GRM will accept complaints from the APs submitted through verbal, email, phone, Facebook, WhatsApp, meeting or letter to the office of the GRM, in English or local language. The focal point persons handling

grievances will transcribe verbal submissions. Receipt of grievances shall be acknowledged as soon as possible, by letter or by verbal means.

When a complaint is made, the GRM will acknowledge its receipt in a communication that outlines the grievance process; provides contact details and, if possible, the name of the GRM officer who is responsible for handling the grievance; and notes how long it is likely to take to resolve the grievance. Complainants will receive periodic updates on the status of their grievances. This GRM has established clearly defined timetables for acknowledgment and follow-up activities. And to enhance accountability, these timetables will be disseminated widely to various stakeholders, including communities, civil society, and the media.

#### **4.3.3 STEP 3: ASSESSMENT AND INVESTIGATION**

This step involves gathering information about the grievance to determine its validity and resolving the grievance. The merit of grievances should be judged objectively against clearly defined standards. Grievances that are straight forward (such as queries and suggestions) can often be resolved quickly by contacting the complainant.

Having received and registered a complaint, the next step in the complaint-handling process is for the focal points to establish the eligibility of the complaint received. The Grievances Registration Officer once a complaint or grievance is registered shall within 5 days assess the registered complaint or grievances to determine its validity and relevance i.e. is it within the scope of the SESRP-GRM as defined in this document. The following criteria can be used to assess and verify eligibility:

- The complainant is affected by the project;
- The complaint has a direct relationship to the project;
- The issues raised in the complaint fall within the scope of the issues that the GRM is mandated to address.

Having completed the complaint assessment, a response can be formulated on how to proceed with the complaint. This response should be communicated to the complainant. The response should include the following elements:

- Acceptance or rejection of the complaint
- Reasons for acceptance or rejection
- Next steps – where to forward the complaint
- If accepted, further documents and evidence required for investigation e.g. field investigations

Once the registered grievance or complaint has been determined as falling within the scope of this GRM, the focal point shall investigate the complaint. Investigation of the complaint may include the following:

- On site visit and verification;
- Focus Group discussions and interviews with key informers;
- Review of secondary records (books, reports, public records); and
- Consultations with local government and traditional authorities.

The SESRP will ensure that investigators are neutral and do not have any stake in the outcome of the investigation. At the end of the field investigation, the GRM officer shall compile a Grievance Investigation Report (GIR) using a standard template (**Annex IV**) on the outcomes of the investigations and the specific recommendation to resolve the grievance or complaint.

#### **4.3.4 STEP 4: RECOMMENDATIONS AND IMPLEMENTATION OF REMEDIES**

After the investigations, the GRM officer shall inform the AP of the outcome of the investigations and the recommended remedies if any. The AP shall be provided with written response clearly outlining the course of action the project shall undertake to redress the grievances and the specific terminal date by which the recommended remedies shall be completed. Potential actions will include responding to a query or comment, providing users with a status update, imposing sanctions, or referring the grievance to another level of the system for further action. The project will take some action on every grievance. If the recommended remedy involves monetary compensation, the GRM must then seek the approval of the Grievance Committee through the SESRP project coordinator.

The Aggrieved Party shall, provide a response agreeing or disagreeing with the proposed course of action within a minimum reasonable period after receiving the recommended actions.

#### **4.3.5 STEP 5: REFERRAL TO THE STATE OFFICE**

In the likely event that the AP is not satisfied with the recommended remedy. The GRM officer shall forward the copy of Grievance Registration Form (GRF) and the Grievances Investigation Report (GIR) to the GRM focal point (SFP).

The SFP shall once has received the GRF and the GIR from the District must conduct own investigations and complete his own GIR and communicate to the AP within 30 working days (i.e. repeat stages 2-3). The SFP in his recommendation shall take into consideration the reasons why the AP rejected the remedies offered by the district GRM focal point. He may decide to offer the same remedies as the GRM officer or different and improved offer.

Once the SFP has concluded the investigations and communicated to the AP. The AP shall have 7 days or less to agree or disagree with the proposed remedies. If the AP is agreeable to the remedy the SFP shall ensure that the remedy is implemented within the agreed time frame.

For a remedy that requires monetary compensation the SPF submit the information to the relevant government department(s).

#### **4.3.6 STEP 6: REFERRAL TO THE GRIEVANCES COMMITTEE**

If and when the AP disagrees with the recommendation of the SFP, the SFP shall within 7 days of receiving the notice of rejecting the offer from the AP compile all the necessary documents regarding the grievance from district and the province to the Grievance Committee through the grievance Chairperson who will be elected by the Committee.

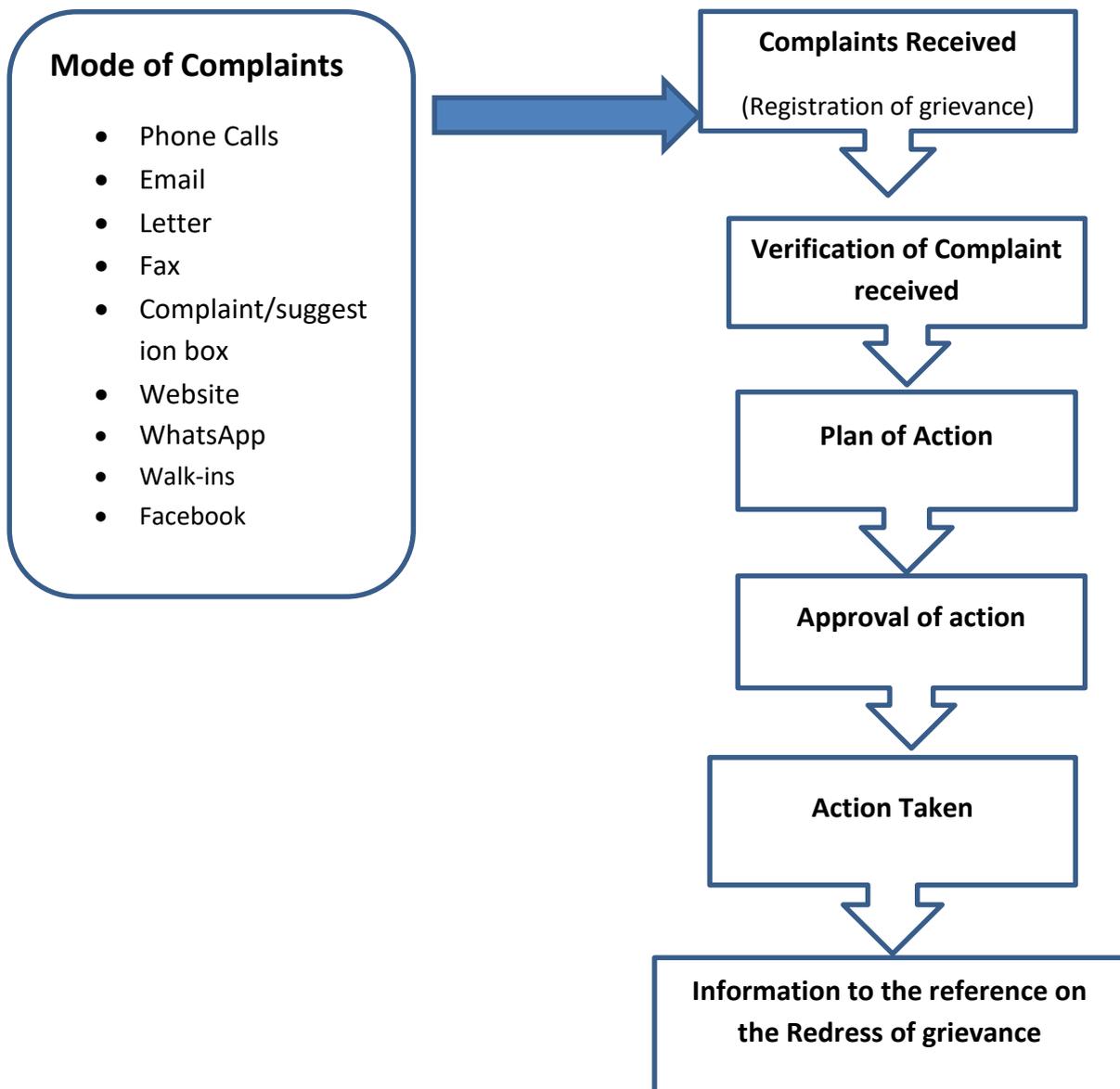
The government implementing partners at the national level shall investigate the matter further and taking into consideration the recommendation of the coordinator and PIU. The

Environmental and Social safeguards Officer shall compile the GIR and submit to the Grievance Committee for consideration. Once the Grievance Committee arrives at a decision it is the responsibility of the SESRP to implement the remedies within the agreed time. If the AP disagrees with the remedy offered by the Grievance Committee, the AP reserves the right to appeal to other external GRMs outside SESRP.

The above described steps and timeframes will be followed to address grievances emanating from implementing of project activities. For grievances that need quick and urgent attention, the described steps will be adhered to. However, in terms of timeframe, the grievances will be addressed in the shortest feasible period based on case to case basis.

For grievances that cannot be resolved at the project level, these will be reported and directed to World Bank Management through the GRS for further redress (see Figure 4-2):

Figure 4-2: Grievance Flow in a basic GRM



#### 4.4 STAKEHOLDERS RESPONSIBILITIES IN THE GRIEVANCE REDRESS MECHANISM

STEP	RESPONSIBILITY	REMARKS
1.	Complainant	Aggrieved Project Affected Person (PAP) raises complaint to Scheme GR Committee (SGRC).
2.	Contract GRM Committee	Formed at the contract/activity level and includes members (project legal specialist, project technical ex and the contractor) and tasked with Assessment, Categorization of grievances, Reviewing and investigating of grievances and providing of solutions. If it is not resolved immediately it is forwarded directly to tier 2 or through the legal specialist.
3.	Contractor	The Contractor resolves issues under his control. Any unresolved issues are elevated to Project Committee. (Contractors are contractually obliged to establish functional GRM)
4.	Project PIU	Consisting of the Project Implementation Unit (PIU) arbitrates grievances between the Contractor and the PAPs, those that he is unable to resolve, the project coordinator escalates to the Ministry Director General
5.	MoEM	Arbitrate grievances of aggrieved parties and refer issues to relevant Government institutions at the appropriate level whenever necessary.
6.	Regional court	All the grievances not resolved by the agreed GRM or which the aggrieved persons are dissatisfied with in terms of resolution, will be reverted to the complainant who will channel them to the Somaliland court system, starting at Regional Court level.

#### 4.5 4.5 GRM communication channels

Telephone: +252634003534 / +252654003534

WhatsApp: +252634003534 /+252654003534

Email: [grm.sesrp9@gmail.com](mailto:grm.sesrp9@gmail.com)

## **5 PERFORMANCE STANDARDS OF SESRP GRM**

To ensure that the SESRP GRM is effective and achieve the intended purposes, the Project Management is committed to the following performance standards:

- At each level of the GRM responsible officers shall take measures to ensure the protection of the Aggrieved Party from possible harassment from any other actors in the community.
- No Grievance/dispute shall be considered insignificant or more significant than other. All grievances shall be given equal consideration.
- All grievances will be treated with confidentiality and anonymity.
- All disputes submitted shall be acknowledged by issuance of a grievance acknowledgement form/receipt
- All grievances shall be recorded in a grievances register and the register shall be maintained in a safe and secure place.
- The GRM officer shall have up to 21 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Compensation Committee shall have up to 30 days from the time they receive a grievance to investigate and provide feedback to the Aggrieved Party.
- The Aggrieved Party once feedback is provided shall have up to 7 days to respond to the relevant correspondence agreeing or disagree with the resolution.
- If the Aggrieved Party is awarded compensation, the compensation granted should be in such a way that it at least restores the AP to his original condition/status or makes them better.

## **6 COMMUNICATION PLAN FOR GRM**

In order to sensitize the various stakeholders (community, individuals etc.) about the GRM, there will be need to produce a number of Information materials such as brochures and posters that will educate the various stakeholders about the content of the GRM and how to access it. Additionally, radio programs will be produced to compliment education materials including translating the GRM into local languages. Other sensitization activities will include community meetings and public forums of the GRM.

### **6.1 Communicate to Build Awareness**

Educating local people and contractors about the grievance redress mechanism is an essential and on-going responsibility. It does no good to have a perfectly designed GRM that no one knows about.

### **7.2 Communicating with Stakeholders/ Beneficiaries**

For an effective operation of the Project GRM, its objectives and procedures will have to be properly communicated to those who will use it so that they will not only be eager to access it but also to own it, taking cultural peculiarity of each community into consideration.

The goal of communicating the GRM to stakeholders is to create awareness at a general level, to build skills and capacity at leadership level as well as to cause adjustment in behaviors and attitudes at the level of all stakeholders with a view to entrenching inclusion. To entrench this GRM as an efficient management tool for the SESRP-PIU, a combination of methods and media should be employed. The communication plan must consider the awareness creation and the behavioral change need of the stakeholders. There is the need for a sensitization forum with the various communities, to acquaint the stakeholders of the project with the guideline and workings of the GRM. A workshop will rally representatives of the states, local governments, traditional institutions as well as key groups and personalities in the project communities.

Accessing the grievance redress system will depend so much on the level of awareness about the mechanism among potential users. This therefore will require groups and mass methods as well as all the media forms available like the mass media, social media, and ministry website and grassroots mobilization.

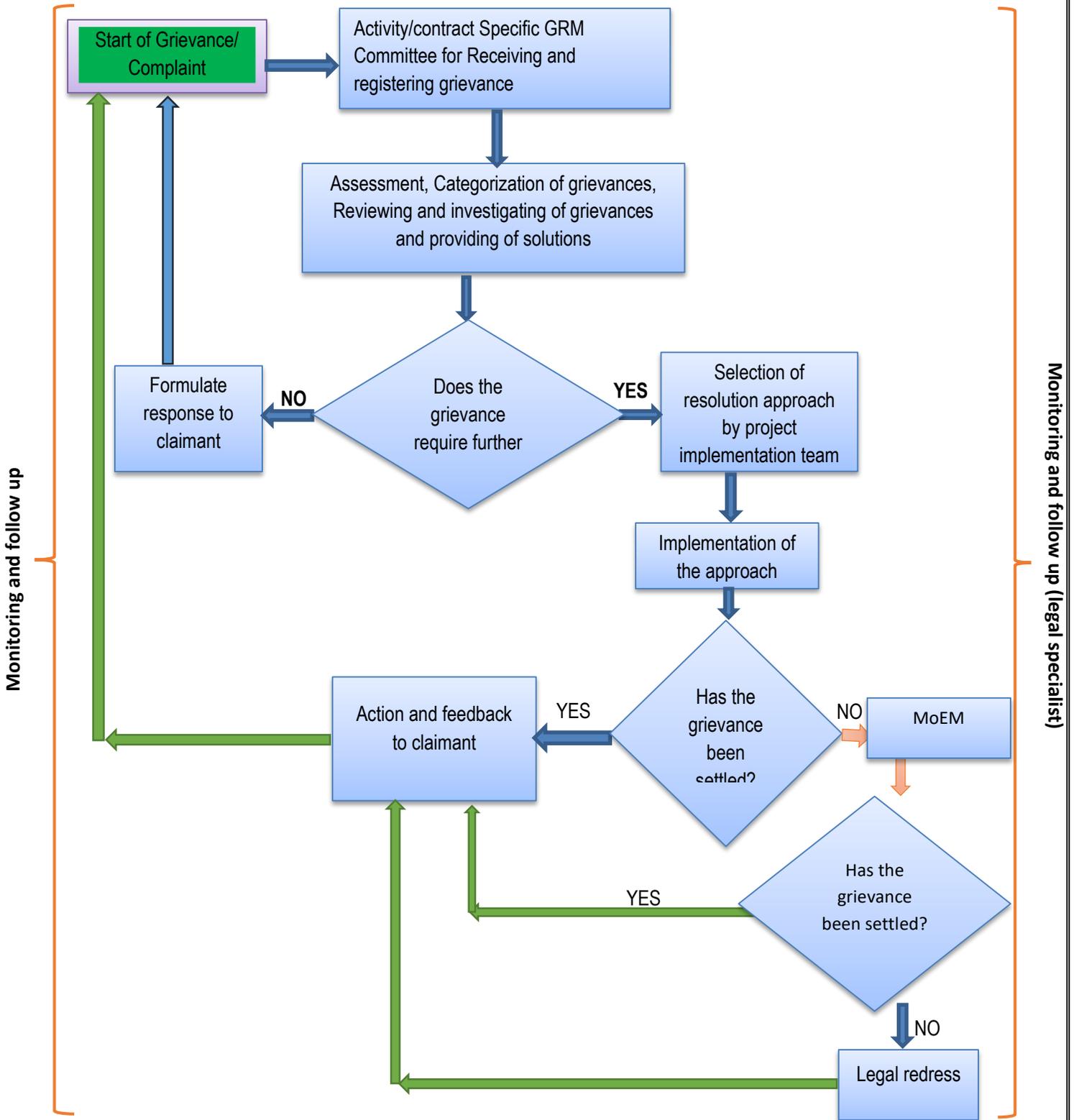
## **7 MONITORING AND EVALUATION**

Monitoring and evaluation are critical to the success of any GRM. Monitoring refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them. The project monitoring and evaluation information system will also include indicators to measure grievance monitoring and resolution. These grievance redress indicators will be incorporated into project results frameworks.

Grievance Redress Mechanism (GRM) monitoring involves assessing the progress being made to handle grievances. The overall result of an effective GRM is to enable stakeholders affected by the SESRP project activities to receive timely feedback and appropriate responses. To achieve this result, specific targets are set, and overall improvement is tracked by a set of indicators. Monitoring will be conducted by the project safeguard officers using performance indicators, which are presented on two different outputs: participation and effectiveness after 3 months (quarterly). For transparency, stakeholders will have an opportunity to track grievances as well. The social safeguard specialist will on a quarterly basis prepare a report and a list of existing and new grievances and share with stakeholders at all levels. The complaint, region/area and status of grievance handling will be made public.

Feedback—informing GRM users and the public at large about the results of investigations and the actions taken—enhances the visibility of the GRM among beneficiaries and increases users’ trust in the system (making it more likely that they will lodge grievances). SESRP will provide feedback by contacting the complainant directly (if his or her identity is known) and/or posting the results of cases in high profile locations and conveying the results through radio broadcasts and other media. The project will also inform GRM users about their right to an appeal if they are dissatisfied with the decision, specifying both internal and external review options (see Figure 7-1: Grievance Redress Mechanism).

Figure 7-1: GRIEVANCE REDRESS MECHANISM PROCESS



**8 ANNEXES**

**8.1 ANNEX 1: GRIEVANCE REGISTRATION FORM (GRM/001)**

Date: \_\_\_\_\_ Grievance Number: \_\_\_\_\_

Plaintiff: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ Village: \_\_\_\_\_

Chiefdom: \_\_\_\_\_ District: \_\_\_\_\_

Province: \_\_\_\_\_

Grievance Category (e.g., land, house, etc.):

\_\_\_\_\_

Grievance location (Village, Ward, District): \_\_\_\_\_

\_\_\_\_\_

Description of grievance: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signature of Recording Officer: \_\_\_\_\_

**8.2 ANNEX II: Acknowledgement Receipt (GRM/002)**

Complaint no.: ..... Date of issuing complaint: ..... (dd/mm/yyyy)

**Place of issuing complaint:**

Village/Town/City/Area: ..... District: .....

**Details of the Complainant:**

Name: ..... Age: .....

Address: ..... Gender.....

Email address: ..... Phone no. ....

**Supporting documents submitted:**

- i. ....
- ii. ....
- iii. ....
- iv. ....
- v. ....

**Summary of complaint:**

.....  
.....  
.....  
.....  
.....

Name of Officer receiving Complaint: \_\_\_\_\_

Signature of Officer receiving Complaint: \_\_\_\_\_

**8.3 ANNEX III: Meeting Record Structure (Grievance Redress Committee & Other Meetings) (GRM/003).**

Date of Meeting: ..... Complaint no.: ..... Venue of Meeting:  
 .....

**List of participants:**

Complainant Side	Grievance Redress Committee Members
1) 2)	1) 2) 3)

**Summary of Grievance:**

.....  
 .....  
 .....  
 .....

**Key discussions:**

- 1)
- 2)
- 3)
- 4)
- 5)

**Decisions Made/Recommendations by the Grievance Redress Committee:**

- 1)
- 2)
- 3)

**Status of Grievance (tick where applicable):**

Solved		Unsolved	
--------	--	----------	--

Chair person's name: \_\_\_\_\_

Chair person's signature: \_\_\_\_\_

Date (dd/mm/yyyy): \_\_\_\_\_

#### 8.4 ANNEX IV: GRIEVANCE INVESTIGATION REPORT (004)

PARTICULARS OF THE GRIEVANCE			
Name of Complainant:			
Grievance Reference Number:			
Grievance Category :			
Grievance Description:			
Grievance location (District, Ward, Village):			
TYPE OF INVESTIGATION CONDUCTED			
Field or Site Visit: Yes. ( ) No. ( )	Desk Review: Yes. ( ) No. ( )	Date Conducted:	
Key people consulted/interviewed:			
Description of the scope of the investigation:			
Summary of the findings:			
Recommendations			
Responsible/Investigation Officer Name:			
Signature:			
Designation:			
Date:			
Province			
District			

**8.5 ANNEX V: Quarterly Report of Registered Complaints (GRM/005)**

Location ..... Date (dd/mm/yyyy) ..... Period (Quarter ending)  
 .....

**i. Details of Complaints Received:**

Place of issuing complaint	Name & Address of complainant	Location of complaint/concern	Date of Receipt	Complaint no.

**ii. Details of Grievance Redress Meetings:**

Date of meeting	Venue of meeting	Names of participants	Decisions/Recommendations made

**iii. Details of Grievances addressed:**

Date of issuing complaint	Category of complaint	Category of grievance	Brief description of grievance	Date of complete resolution

*(Note: Copy to be submitted to the Project Coordination Unit)*