INCLUSIVE DIGITALIZATION IN EASTERN AND SOUTHERN AFRICA PROJECT

(IDEA)

GRIEVANCE REDRESS MECHANISM MANUAL

DECEMBER 2025

Table of Contents

1.0 Introduction

1.1 Project Background

About IDEA

Inclusive Digitalization in Eastern & Southern Africa (IDEA) is a regional Multiphase Programmatic Approach (MPA) for Eastern and Southern Africa (AFE), which includes three focus areas of : (i) building the foundations for affordable and quality broadband connectivity, data hosting capability, enabling access to digital technology and digital services including (ii) interoperable and safe data platforms and trusted online transactions at national and regional level; (iii) advancing high-impact digitally-enabled applications in priority sectors (with an initial focus on social protection and financial services), digital skills and competencies to increase productive digital usage and enhance economic and social activities.

The MPA sets out an ambitious agenda towards achieving universal digital access in AFE through a programmatic approach comprising key pillars and 'menu of options.'

1.2 IDEA Project Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) in the IDEA Project is a structured system designed to receive, resolve, and monitor stakeholder concerns, including complaints, queries, suggestions, and positive feedback related to the project. The stakeholder input processed through this mechanism may be referred to as grievances, complaints, feedback, or other equivalent terms.

The GRM aims to be accessible, collaborative, expeditious, and effective, ensuring that concerns are resolved through dialogue, joint fact-finding, negotiation, and problem-solving. It serves as the first line of response for stakeholder issues that may not have been addressed through proactive engagement.

The IDEA GRM is designed to complement not replace formal legal systems for grievance resolution, such as the court system and organizational audit mechanisms.

Stakeholders retain the right to pursue formal alternatives, including legal remedies, and are not restricted from seeking redress through national, regional, or international forums. If dissatisfied with the project's response, stakeholders may also submit grievances through the World Bank's Grievance Redress Service (GRS).

1.3 Objectives of the GRM

The grievance mechanism aims to address concerns and complaints from affected stakeholders. The objectives include:

i)To receive, log, analyze and address complaints and grievances and enhance conflict resolution arising during project implementation, while keeping complainants informed of the progress being made to resolve the grievances.

ii)Ensure transparency, accountability and non-discrimination throughout the implementation of program amongst the relevant stakeholders including project beneficiaries.

4

iii)Resolve any emerging ESHS grievances in the project.

iv) To promote relations between the program implementers, executers and beneficiaries

v)Provide avenue for vulnerable groups and survivors of SEA/SH to have equal access to grievance redress, while ensuring that SEA/SH grievance response mechanisms are survivor centered.

1.4 Rationale for the GRM

The GRM is established to provide a structured and accessible mechanism for receiving, logging, and addressing complaints, ensuring timely resolution while keeping complainants informed. It promotes transparency, accountability, and non-discrimination among stakeholders, resolves emerging ESHS-related grievances, and fosters positive relationships between project implementers and beneficiaries. Importantly, the GRM ensures that vulnerable groups and SEA/SH survivors have equitable, survivor-centered access to grievance redress.

1.5 Scope and Admissibility of the GRM

The IDEA Project GRM is designed to receive and address stakeholder feedback, including:

- Service quality concerns.
- Complaints about shortcomings, failures, or dissatisfaction with delivery.
- Labour and application process issues.
- Environmental and social risks; and
- Concerns regarding any aspect of project implementation.

Upon receiving a complaint, it is first assessed for eligibility. A complaint will be considered eligible if it:

- Relates to the IDEA Project.
- Alleges environmental and/or social harm caused or likely to be caused by the project; and
- is filed by a stakeholder who believes they have been affected by the project.

Not all grievances fall within the scope of the project GRM. Complaints are deemed inadmissible if they:

- Relate to procurement matters.
- Allege fraud or corruption
- Concern employment or job applications within the project.

Grievances relating to fraud or corruption will be referred to the COMESA accountability mechanism or appropriate administrative or judicial bodies for formal investigation. Since the IDEA Project GRM is designed for collaborative problem-solving, these issues require a separate dispute resolution process.

1.6 GRM Guiding Principles

The IDEA GRM is designed and continuously updated in alignment with internationally recognized

principles for grievance resolution, as elaborated by the UN Human Rights Council (2011). These core international principles include:

- *Legitimacy:* The GRM fosters trust among stakeholders by ensuring fair, unbiased grievance handling while preventing interference in its processes.
- *Accessibility:* The mechanism is designed to be widely known and easy to access, addressing potential barriers such as language, literacy, costs, location, and fear of reprisal.
- *Predictability:* A clear, structured procedure with defined timeframes ensures complainants understand the process and anticipated outcomes.
- *Equitable:* Aggrieved parties will receive fair access to information, advice, and expertise needed to engage effectively in grievance resolution.
- *Transparency:* Complainants will be kept informed about their grievance status while ensuring confidentiality in sensitive cases.
- *Rights Compatible:* Resolutions will align with national and international legal standards, ensuring fairness and compliance with human rights.
- *Continuous Learning:* The GRM will undertake regular analysis of grievances, identifying patterns and lessons for ongoing improvement in policies and processes.
- *Engagement & Dialogue-Based:* Stakeholders will be consulted to ensure the GRM remains relevant, effective, and reflects their needs.
- *Simplicity:* The process of lodging complaints will remain straightforward and user-friendly, ensuring accessibility for all, particularly vulnerable groups.
- *Fairness:* All grievances will be registered and acknowledged, regardless of their complexity or nature. Project staff will receive specialized training in grievance handling and resolution.
- *Objectivity & Independence:* The GRM structure ensures committees operate independently, free from conflicts of interest, with accessible records for inquiry and analysis.
- *Confidentiality:* The GRM structure ensures that all information related to a complaint including identity of complaint, witnesses and any sensitive details is protected from any unauthorized disclosure

1.7 Institutional Arrangements

The project has established grievance resolution structures at multiple levels to ensure effective redress. These structures, detailed in Section 2.1.1, include:

- A Grievance Task Team – The first line of response for resolving grievances and providing stakeholder feedback.
- A Management Response Committee (MRC) – Responsible for addressing grievances that cannot be resolved by the Task Team.
- COMESA Executive Management – Provides further guidance if the grievance remains unresolved at the MRC level.
- The COMESA Court of Justice – Sitting as an Arbitral Tribunal handles disputes referred by the Executive Management when stakeholders remain dissatisfied with the resolution process.

Each of these structures plays a critical role in ensuring transparency, accountability, and responsiveness in grievance handling.

1.8 Creating Awareness of GRM

GRM will be widely publicized among internal and external stakeholder groups such as the affected parties, e.g., COMESA member states, MDAs, COMESA staff, RICTAs, IGAD, EAC, SADC, etc.

The project will implement a comprehensive, multi-channel strategy to inform stakeholders about the availability of its Grievance Redress Mechanism (GRM). Technical workshops will serve as key platforms for communicating details of the project GRM, ensuring stakeholders understand its functionality and importance.

To facilitate accessibility, the GRM manual will be distributed to project staff, while external stakeholders will receive the GRM brochure and supplementary materials including grievance submission forms through the project website.

The brochure will clearly outline essential aspects of the GRM, such as:

- The process for lodging formal complaints.
- Expected timeframes for each stage of grievance resolution.
- A commitment to confidentiality, responsiveness, and transparency; and
- Alternative avenues for dispute resolution.

Awareness efforts will be monitored using metrics such as number of GRM materials disseminated, outreach events held, digital access statistics, and rate of grievance submissions.

2.0: Structure of the Grievance Redress Mechanism

2.1 The Project GRM Structure

The project follows a multi-tiered approach to addressing grievances arising from its implementation. The Grievance Redress Mechanism (GRM) is designed to handle both sensitive and non-sensitive grievances through distinct but complementary structures.

2.1.1 Non-sensitive Grievances

Non-sensitive grievances will be resolved through a structured mechanism that combines administrative procedures with formal dispute resolution protocols. This approach ensures that stakeholders have a clearly defined platform to express concerns and seek redress. The grievance resolution structure for non-sensitive grievances is outlined in Figure 1 and detailed below.
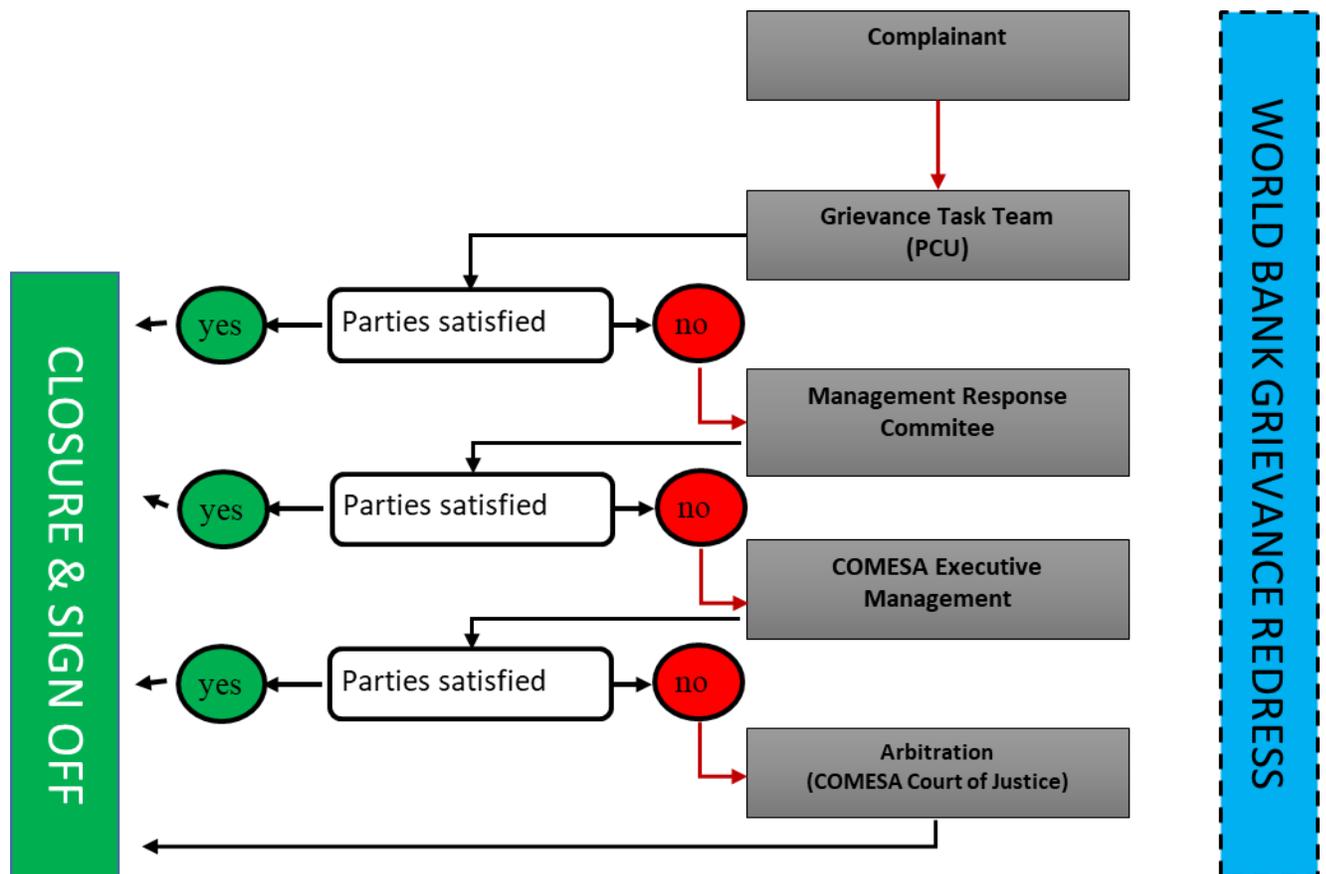

Figure 1: Structure for resolving non-sensitive grievances

Grievance Task Team

The Grievance Task Team (hereafter referred to as the "Task Team") serves as the first line of response for grievance resolution and stakeholder feedback. The Task Team consists of the following experts drawn from the Project Coordination Unit (PCU):

- Project coordinator
- Social Safeguards Specialist.
- Environmental Specialist.
- Stakeholder Engagement Expert.
- Legal Expert (Ex Officio).
- Monitoring and Evaluation Expert

The key responsibilities of the Task Team are:

- Convening, investigating, collation of evidence and seeking resolution for grievances raised
- Escalating grievances that cannot be resolved at the Task Team level
- Raising stakeholder awareness about the existence and function of the project GRM

The Project Coordinator shall chair Task Team meetings and have final authority to approve the resulting meeting reports. The **Legal Expert**, serving in an *ex officio* capacity, will act as secretary and provide legal advisory support.

The Social Safeguards Expert serves as the primary focal point for coordinating and managing the Project's Grievance Redress Mechanism (GRM), working in close collaboration with the **Environmental Specialist**, who provides technical support. The **M&E Expert** track and analyze GRM KPIs, maintain quality assurance of data entered in the grievance registry, and provide periodic GRM performance summaries for inclusion in quarterly and annual project reports. Their key duties include:

- Overseeing the design, implementation, and monitoring of the GRM in accordance with project guidelines and safeguards policies.
- Ensuring timely registration, acknowledging receipt to complainants, tracking, and resolution of grievances from stakeholders.
- Facilitating awareness and accessibility of the GRM at all project levels
- Organizing Task Team meetings and ensuring relevant materials are available
- Recording and sharing meeting minutes with Task Team and project members
- Documenting actions taken on each grievance and updating the logbook accordingly
- Preparing regular reports and updates on GRM performance for project management and stakeholders; and
- Reviewing and updating the Project GRM.

Management Response Committee

If a grievance cannot be resolved by the Task Team, the Project Coordinator escalates the issue to the Management Response Committee (MRC), which consists of:

- Director, Infrastructure and Logistics
- Director, Human Resources and Administration

- Director, Gender and Social Affairs
- Director, Legal and Corporate Affairs; and
- IDEA Project Coordinator.

The key responsibilities of the MRC are to:

- Review cases escalated by the task team
- Provide guidance to the Task Team on complex grievance categories
- Recommend and approve final decisions

COMESA Executive Management

If the MRC is unable to resolve the grievance, the Director of Infrastructure and Logistics escalates the matter to COMESA Executive Management, who provides further guidance on the resolution process.

COMESA Court of Justice

If affected parties remain dissatisfied with the project's grievance resolution process, the Executive Management through the office of the Secretary General refers the dispute to the COMESA Court of Justice, sitting as the Arbitral Tribunal, within 30 days. As COMESA's judicial organ, the Court of Justice is responsible for interpreting the COMESA Treaty and adjudicating disputes formally referred to it by authorized parties. It operates independently of project-level grievance mechanisms and may only be engaged where disputes are escalated beyond administrative or project resolution channels, in accordance with applicable legal procedures

2.1.2 Redressing Sensitive Grievances

Sensitive grievances, including Gender-Based Violence (GBV) and cases related to Sexual Exploitation, Abuse, and Harassment (SEA/SH) will be received by trained SEA/SH focal persons resident at COMESA Secretariat. These focal persons will follow a survivor-centered approach, ensuring confidentiality, safety, and prioritizing the survivor's choices, needs, and well-being.

All SEA/SH cases will be recorded in a password-protected electronic logbook, accessible only to designated focal points. Complaints related to GBV/SEA/SH can be submitted via a dedicated email address (seah_idea@comesa.int) or through specified contact lines.

If a survivor requires legal assistance, counseling, or psychosocial support, the focal persons will refer them to appropriate GBV service providers within their vicinity.

For cases requiring investigation, the project will recruit a SEA/SH investigator to conduct inquiries and provide recommendations for appropriate action. Based on these recommendations, the project will take necessary steps in accordance with the Project Accountability and Response Framework (ARF) – 2.1.3 Figure 2 outlines the structure for handling sensitive cases. Anonymized and aggregated SEA/SH statistics will be availed for the purposes of reporting, without access to survivor identities or case-level details.

2.1.3 Accountability and Response Framework

2.1.3.1 Introduction

This framework sets a clear and structured approach to preventing and addressing Gender-Based Violence (GBV) including Sexual Exploitation, Abuse, and Harassment (SEA/SH) within the IDEA Project. By establishing strong guiding principles, disciplinary measures, and response mechanisms, it ensures accountability while prioritizing the safety and dignity of survivors. The inclusion of a SEA/SH sensitive GRM, as required by the World Bank, strengthens the commitment to addressing SEA/SH allegations transparently and effectively.

2.1.3.2 Guiding Principles

The IDEA Project is committed to fostering a safe, respectful, and inclusive environment for all individuals. The following principles guide our approach to addressing Sexual Exploitation, Abuse, and Harassment (SEA/SH):

- All project workers will be treated with respect, regardless of race, ethnicity, religion, political affiliation, disability, or other status;
- Every individual, including children, has the right to live free from SEA/SH;
- SEA/SH is unacceptable in any form, whether at the workplace or project locations;
- The safety and well-being of survivors are a top priority;
- Perpetrators will face disciplinary measures, penalties, termination of employment, and possible prosecution under COMESA and national laws;
- Sexual activity with individuals under 18, including online harassment, is strictly prohibited. Claims of mistaken age or consent are not valid defenses;
- Inappropriate language or behavior including harassment, abusive conduct, or sexually provocative or demeaning acts is unacceptable;
- Exchanging money, employment, goods, or services for sex, including sexual favors or exploitative behavior, is strictly prohibited;
- Unestablished sexual relationships between project staff and community members are strongly discouraged, especially where benefits are exchanged or withheld, as such acts are considered non-consensual;
- The Project provides mechanisms for reporting SEA/SH allegations without fear of retaliation, victimization, or retribution
- All personnel must actively support and uphold a work environment free from SEA/SH.

2.1.3.3 Addressing SEA/SH Allegations

In compliance with World Bank requirements, the project has developed a dedicated mechanism for receiving and addressing all complaints related to Sexual Exploitation, Abuse, and

Harassment (SEA/SH). Figure 2 provides a simplified overview of the process for handling such cases, while the GRM Manual offers a comprehensive description of the procedures involved.
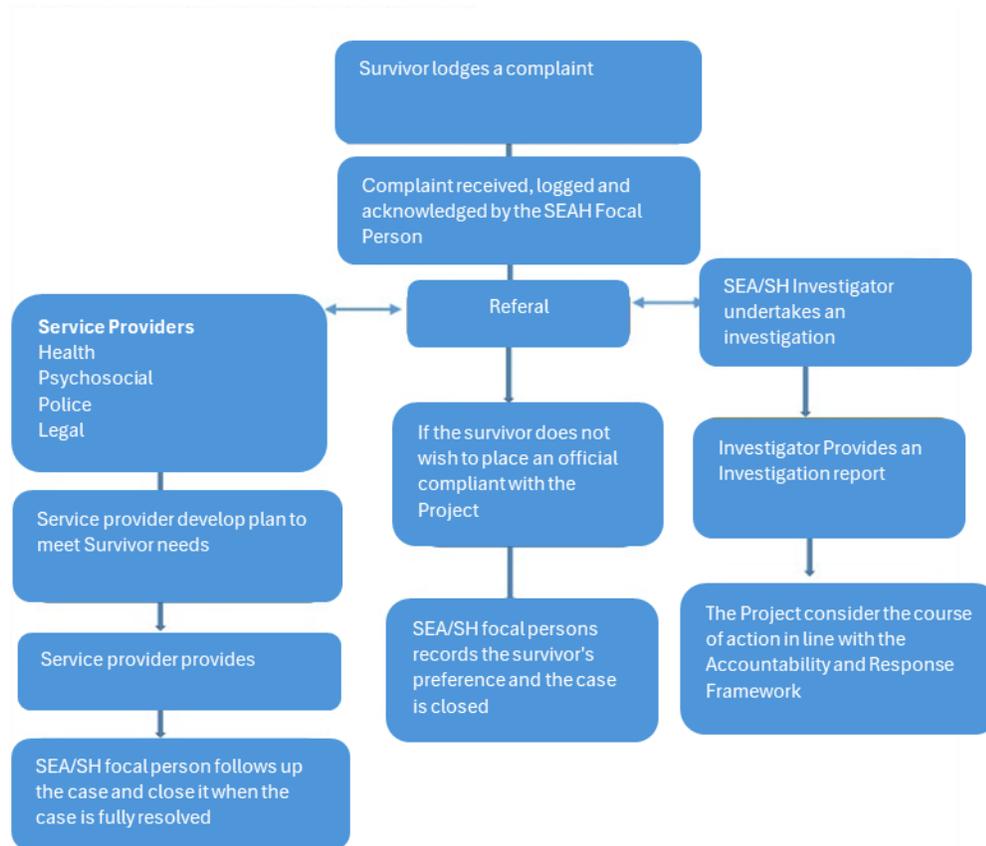
Figure 2: Procedure for handling SEA/SH cases

2.1.3.4 A Survivor-Centered Approach

The IDEA Project is committed to a survivor-centered approach in responding to Gender-Based Violence (GBV) cases through the established SEA/SH sensitive GRM. All project partners are expected to adopt or strengthen this approach to ensure survivors receive the necessary support for healing and recovery.

In resolving SEA/SH cases, the survivor's needs, rights, and choices will remain central to all processes. The project, in collaboration with its GRM and GBV service providers, will ensure:

- Survivors are treated with dignity and respect, with their needs and choices prioritized throughout the process. Assistance will not be imposed on a survivor unless they are ready. However, support will be available for survivors seeking redress or reconsidering their decision to take action.

- Survivors' decisions will be respected. However, if the survivor is a minor (under 18), legal requirements for reporting abuse to authorities will be upheld, regardless of consent.
- The welfare and Best Interest of the Child principle will guide all cases involving minors.
- The safety and security of survivors remain a top priority. Every effort will be made to minimize the risk of traumatization or further harm; Confidentiality will be strictly maintained to protect survivors from retaliation or stigmatization; Information will only be shared with other agencies or individuals with informed consent.
- Survivors will be provided with comprehensive information to make informed decisions.
- Case handlers will be trained in cultural and social sensitivity, non-judgmental practices, confidentiality, and tactful engagement.
- Survivors reporting SEA/SH incidents will have their accounts recorded by SEA/SH focal persons in a private setting, ensuring any vulnerabilities and safety concerns are considered.
- To maintain confidentiality and reduce stigmatization, SEA/SH complaint forms will only record essential details, including:
    - Age and sex of the survivor.
    - Type and details of the alleged incident (as reported).
    - Location where the incident occurred.
    - Date and time of the incident.
    - Whether the alleged perpetrator is associated with the project (as indicated by the survivor);
    - Whether the survivor was referred to a service provider.
    - The survivor's expressed needs and requested actions regarding the incident.
- SEA/SH records will be stored separately from general complaints and accessible only to designated SEA/SH focal persons and the Project Coordinator; and
- The SEA/SH focal persons will register the case, notify the Project Coordinator and Grievance Task Team within 24 hours, and send an acknowledgment letter to the survivor within two working days.

2.1.3.5 Roles and Responsibilities

Building on the established principles and procedures for mitigating and responding to SEA/SH cases, the project has defined distinct tiers of roles and responsibilities within its organizational structure. The table below outlines these roles in detail.

Table 1: Roles and Responsibilities for mitigating SEA/SH cases

Structure	Designated Staff	Role
Management Response Committee	All members	- Case Resolution & Guidance: Address, refer, or provide guidance on SEA/SH cases reported by the Project Implementation Unit (PCU) - Monitoring & Evaluation: Review reports from the PCU on its activities and progress in mitigating and responding to SEA/SH cases

Structure	Designated Staff	Role
		• Operational Improvement: Provide feedback to the PCU to enhance its responsiveness to survivor needs.
Project Management Unit	Environmental Specialist & Social Safeguards Specialist	• Implementation Oversight: Supervise the application of mitigation and response measures to reduce SEA/SH risks within the project • Risk Assessment & Mitigation: Integrate environmental and social (E&S) risk assessment and mitigation into project risk evaluation activities • Contract Compliance: Ensure the inclusion of relevant SEA/SH clauses in work contracts • Training & Capacity Building: Oversee training initiatives to educate project staff on SEA/SH awareness and prevention • Compliance Monitoring: Conduct regular evaluations to assess adherence to SEA/SH requirements and provide feedback to improve performance. • Policy Development: Establish and implement SEA/SH mitigation policies, procedures, and the Code of Conduct.
Grievance Task Team	Task Team Members	• Case Management: Handle SEA/SH case resolution, ensuring a structured and survivor-centered approach • Employee Training: Facilitate training sessions for all personnel to strengthen SEA/SH awareness and response
	SEA/SH focal person(s)	• Complaint Handling: Log SEA/SH complaints and process cases for referral, resolution, and reporting to the Grievance Task Team
Consultants	**All**	• Contractual Compliance: Ensure personnel comply with SEA/SH mitigation measures outlined in their work agreements

2.1.3.6 Sanctions for SEA/SH violations

Once a violation of Sexual Exploitation, Abuse, and Harassment (SEA/SH) is established, appropriate sanctions may be imposed, including:

- **Additional Training:** Mandatory participation in SEA/SH awareness and prevention programs

- **Informal Warning:** Verbal caution issued for minor infractions
- **Formal Warning:** Written reprimand placed on record
- **Suspension:** Temporary removal from duties with or without pay
- **Salary Deduction:** Partial or full loss of salary for a specified period
- **Termination:** Permanent dismissal from the project
- **Legal Reporting (Minors):** Mandatory report to law enforcement or legal authorities if the survivor is a minor and has been sexually abused; and
- **Legal Reporting (Adults):** Reporting to police or legal authorities, contingent on the survivor's informed consent.

2.1.3.7 Legal Considerations

The IDEA Project is committed to ensuring that all stakeholders comply with relevant laws and regulations governing its implementation. Gender-Based Violence (GBV) offenses such as rape are classified as criminal acts and cannot be resolved outside the judicial system.

The project will collaborate with GBV service providers in various implementation areas to facilitate the reporting of such incidents to law enforcement agencies. Survivors will be given autonomy to determine how they wish to proceed with their cases, ensuring their rights and well-being remain central to the process.

2.2 World Bank Grievance Redress Service

Project stakeholders who believe the IDEA Project has caused or may cause adverse effects on them, their community, or the environment are encouraged to submit their complaints to the Bank's Grievance Redress Service (GRS) or its independent Accountability Mechanism (AM).

The **GRS** enhances the World Bank's responsiveness and accountability by ensuring grievances are promptly reviewed and addressed. The **Accountability Mechanism (AM)** houses the **Inspection Panel**, which assesses whether harm has occurred or may occur due to Bank non-compliance with policies and procedures. Additionally, the **Dispute Resolution Service** provides affected communities and borrowers an opportunity to resolve complaints through mediation.

For more information on submitting complaints, please visit:

- Bank's Grievance Redress Service (GRS) http://www.worldbank.org/GRS
- Bank's Accountability Mechanism (AM) https://accountability.worldbank.org

3.0 Procedure for Resolving Grievances

The procedure for grievance redress under the project includes seven key stages depicted in Figure 3. These stages include: (i) Receiving and registering grievance; (ii) Acknowledging, assessing and assigning responsibility; (iii) Developing a proposed response (iv) Communicating proposed response to complainant and seek agreement on the response; (v) Implementing the response to resolve the grievance; (vi) Reviewing the response if unsuccessful; and (vii) Closing out or referring the grievance. Irrespective of the stage of the process, the complainant has the opportunity to pursue the grievance through the court as is his/her legal right. The complainant also has the right of recourse through the World Bank Grievance Redress service, if not satisfied with the Project's GRM response.
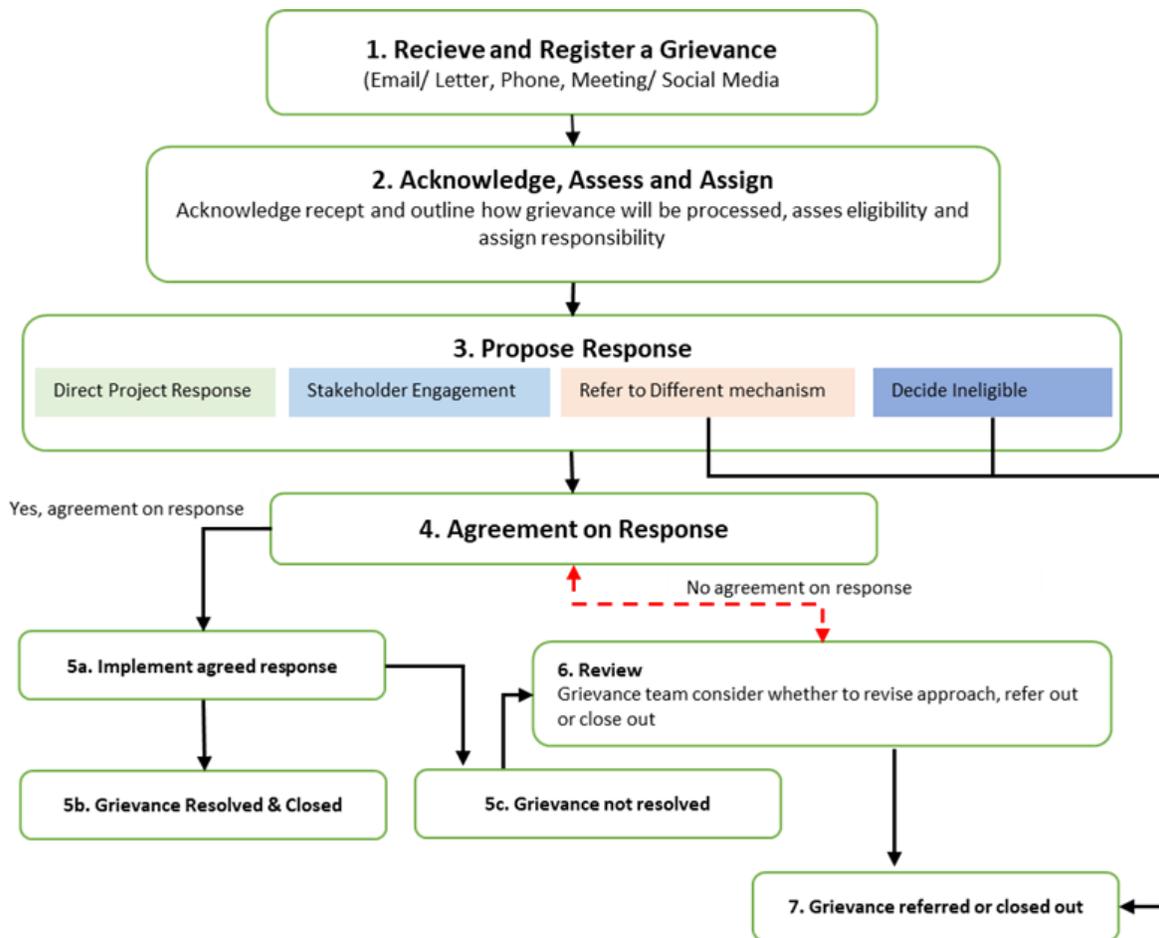
Figure 3: Procedure for resolving grievances

3.1 Categorization of Grievances

The GRM will handle all types of grievances, including but not limited to work-related issues, labour practices, health and safety concerns, and incidents of discrimination. Criminal matters, however, will be referred to the appropriate authorities. Examples of complaints Include unfair dismissal from work, suspected corruption or theft, unsafe working conditions, delayed or non-payment of wages, excessive working hours or poor working conditions, incidences of GBV, SH, and SEA e.t.c.

Following eligibility assessment, grievances will be categorized as follows:
Category 0: Complaints unrelated to the project or project workers

Category 1: Queries, comments, and suggestions

Category 2: Complaints that are non-criminal and do not require police investigation

Category 3: Complaints and concerns that are criminal in nature, requiring police investigation

Once categorized, grievances undergo further evaluation based on "risk" and "urgency", classified as high, medium, or low.

Based on this assessment, grievances will be assigned a priority index (Category 1–5), as detailed in Table 2. Priority 1 grievances require immediate attention due to their potential for serious consequences, such as loss of project funds or life. The GRM focal person will record the assigned priority level in the Excel grievance register for tracking.

Table 1: Risk assessment matrix

		RISK		
		High	Medium	Low
URGENCY	High	1 (Critical)	2	3
	Medium	2	3	4
	Low	3	4	5 (Lowest Risk)

Assigning Responsibility

Complaints will be referred to the most appropriate institution or individual with the expertise and authority to handle the grievance. The referral process will be determined by:

- The nature of the issue raised

- The risk classification assigned during assessment
- For example, grievances involving sexual abuse or sexual assault will be immediately referred to law enforcement authorities, such as the Police, ensuring appropriate action is taken.

3.2 Receiving and Registering Grievances

The first step for any complainant to benefit from the project GRM is lodging a complaint through any of the multiple channels constituted by the Project (e.g., phone, letter, email, website, meeting, etc.). Table 3 outlines the multi-channel grievance submission platform developed under the IDEA project.

Table 3: Multichannel platform for receiving grievances

i.	Email: grmidea@comesa.int
ii.	Calls: (260) 211 229725/32 Fax: (260) 211 225693/232311
iii.	WhatsApp: +260772909403/ +260773000254
iv.	Letter to the IDEA Project Coordinator: Infrastructure and Logistics Division. COMESA Secretariat, COMESA Centre, P. O. Box 30051, Lusaka 10101, Zambia
v.	Walk in: IDEA Project Office, COMESA House, Ben Bella Road, Lusaka, Zambia
vi.	For sexual misconduct, report to our SEA/SH focal points: seah_idea@comesa.int
vii.	Through meetings, conferences and workshops

3.2.1 Email Submission

The first channel is through email submissions. Stakeholders can send grievances electronically through the official project email address dedicated to the GRM. This channel supports written documentation and allows complainants to attach photos or documents as evidence.

3.2.2 Calls

Stakeholders may report concerns via the office phone number provided. GRM staff will document all details provided during the call.

3.2.3 WhatsApp

Workers and stakeholders can report any concerns or complaints about the Project using WhatsApp, providing a quick and accessible way to raise issues. Messages sent to the designated Project WhatsApp number are treated confidentially, and each report is logged and

assigned a reference number to ensure proper tracking. The Project team will respond within the established timeframe.

3.2.4 Written Letters

Complainants may submit formal letters addressed to the Project coordinator. These letters can be delivered by hand or through postal services and will be recorded in the grievance register upon receipt.

3.2.5 Walk in

The first channel is through walk-in. This channel will allow beneficiaries of the IDEA project to register complaints directly to the staff at the COMESA office. All complaints received through this channel should be processed

3.2.6 Meetings, Conference, workshops

Workers and stakeholders can raise concerns during regular project meetings, providing a safe space to report issues directly to supervisors. All concerns are recorded, tracked, and addressed promptly. Meetings complement other channels such as WhatsApp, email, hotline, and in-person submissions, ensuring grievances are resolved transparently and inclusively

3.2.7 GRM box

The Project will provide secure GRM boxes at fixed locations to receive complaints, concerns, and feedback related to project activities. To improve accessibility during meetings, workshops, or conference, GRM boxes may be temporarily relocated but must remain lockable, clearly labeled, and handled only by authorized personnel.
GRM boxes are accessible to all project stakeholders and allow for the submission of grievances either anonymously or with contact information. All grievances received are recorded, assessed, and addressed in a timely, transparent, and confidential manner.

3.2.8 Anonymous Complaints: are accepted through all above-mentioned channels. Complainants can submit their grievances without providing personal contact information.

The project will encourage complainants to submit grievances using the Grievance Submission Form (Annex 1), which is also available online. Upon receiving a grievance, the grievance focal person will:

- Register the complaint in a centralized Excel database (Annex 2)
- Assign a tracking number following an established protocol

If a grievance is submitted anonymously, the Task Team will assess its substance and relevance to determine if action is required. Although direct acknowledgment and response may not be possible, anonymous complaints will be treated with urgency as they may indicate broader underlying concerns requiring attention in project risk analysis.

Complainants will be encouraged to submit details on following:

- Project identification relevant to the grievance

- Clear description of the project's adverse impact(s)
- Personal identification (if confidentiality is requested, this will be respected)
- Representative details (if submitting on behalf of an affected person or community):
  - Name, signature, contact information
  - Written proof of authorization
- Supporting evidence (optional but useful for assessment and resolution)
- Suggested resolution from the complainant's perspective

Any individual, group, community, or organization impacted by the project may file a grievance. The GRM permits complaints to be submitted by representatives, provided they supply credible documentation confirming that they have consent to act on behalf of those affected. The choice of submission channel or platform is based on the complainant's convenience. The Task Team will document and translate grievances submitted in local languages, ensuring inclusivity. While the GRM operates in the three official COMESA languages Arabic, English, and French. Grievances in other languages will also be processed to ensure fair access.

3.3 Acknowledging, Assessing, and Assigning Responsibility

Acknowledging Receipt

The Project Coordination Unit (PCU), through the GRM focal person, will promptly acknowledge receipt of each grievance using the acknowledge of receipt form (Annex 3). This acknowledgment will:

- Confirm that the grievance has been received, logged, and will be reviewed for eligibility
- Indicate that, if eligible, an initial organizational response will be generated
- Be provided to the complainant within two days of receiving the grievance, as outlined in Table 4.

Assessing Eligibility

Once grievance is received and registered, the Grievance Task Team will assess its eligibility to ensure it is relevant to the project. If deemed ineligible, the complainant will be immediately informed of the reasons. It is important to note that eligibility assessment only serves as an initial determination, it does not imply that the project has caused harm or that redress will necessarily be provided.

The Task Team will determine eligibility based on the following four criteria:

1. Does grievance indicate a negative economic, social, or environmental impact caused by the project?
2. Does grievance specify the type of impact and how the project has or may cause it?
3. Does grievance demonstrate that the complainant is impacted, at risk, or is representing affected individuals?
4. Does grievance contain sufficient information for GRM staff to assess the first three criteria?

3.4 Developing a Response

The Project GRM) will generate three primary types of responses to complaints:

1. Direct action to resolve the complaint.
2. Further assessment and engagement with the complainant and relevant stakeholders to determine the most appropriate resolution.
3. Determination of ineligibility, if grievance does not meet the criteria for the GRM or is better suited for another mechanism.

The Task Team will assess whether the grievance can be addressed directly through a simple resolution or if further assessment and engagement are required. Many complaints can be resolved through straightforward actions, such as investigating alleged damage or improving public access to information. More complex cases may require multi-stakeholder involvement, including joint fact-finding, dialogue, and negotiation.

If a complainant is dissatisfied with the GRM investigation outcome, they may pursue arbitration or seek legal recourse.

3.5 Communicating GRM Responses

The GRM focal person is responsible for ensuring the timely communication of responses to complainants. Responses will be provided:

- In writing using language that is clear and accessible to the complainant.
- With the feedback date recorded in the grievance log register.

Each response will include:

- A clear explanation of why the proposed resolution was determined.
- The specific action to be taken.
- The complainant's available options, which may include:
    - ✓ Agreement to proceed with the proposed resolution.
    - ✓ Request for a review of an eligibility or referral decision
    - ✓ Further dialogue regarding the proposed action
    - ✓ Participation in an assessment and engagement process; and
    - ✓ Pursuing the complaint through other formal channels.

If the complainant agrees with the response, the project will proceed with direct action, further assessment, or referral. However, if the complainant disagrees, challenges an ineligibility finding, or rejects the proposed resolution, the Task Team will:

- Clarify the reasons for the proposed response
- Provide additional information and explanations where necessary
- Where possible, revise the approach to address concerns and
- Prioritize in-person meetings with dissatisfied complainants over written

correspondence.

If an agreement is still not reached, the Task Team will:

- Inform the complainant about other available recourse, including the judicial system or other administrative channels, such as the World Bank's Grievance Redress Service (GRS)
- Document the discussion outcomes, ensuring clarity on the options provided and the complainant's decision
- Reaffirm that the GRM remains open to the complainant should they wish to revisit their concerns or raise a new grievance in the future

Sensitive cases will be addressed according to the procedures outlined in Section 2.1.2, ensuring a survivor-centered approach where applicable.

3.6 Implementation of Agreed Actions

If a complainant and the Task team reach an agreement to proceed with a proposed action or stakeholder engagement process, the response will be implemented accordingly. In cases where broader stakeholder assessment and engagement are required, the assessment may be conducted by:

- The Task Team
- Consultants or impartial experts deemed effective by the project, the complainant, and other stakeholders.

The primary objectives of the assessment and engagement process include:

- Clarifying the issues and events that led to the complaint
- Identifying the stakeholders involved
- Understanding stakeholders' views, interests, and concerns
- Determining whether key stakeholders are willing and able to engage in a collaborative resolution process (fact-finding, dialogue, negotiation)
- Establishing stakeholder representation and decision-making authority
- Defining a work plan and timeline for issue resolution
- Identifying necessary resources and contributors.

The stakeholder assessment may lead to:

- Agreement among key stakeholders on a collaborative approach to resolving the grievance; or
- Determination that certain key stakeholders are unable or unwilling to participate.

Regardless of the outcome, the Task Team will communicate the assessment findings to the complainant and other stakeholders, providing recommendations on whether and how to proceed. If a collaborative approach is viable, the Task Team is responsible for overseeing its

implementation.

3.7 Review the Response if Unsuccessful

If an agreement is not reached, the Task Team will reassess the situation with the complainant and explore potential modifications to the response. If no further adjustments are possible, the Task Team will:

- Inform the complainant of alternative grievance resolution mechanisms, including judicial or administrative options; and
- Document the discussions and the complainant's decision regarding the available alternatives.

3.8 Close Out of the Grievance

The final step in the grievance resolution process is **closure**. If the grievance is **resolved**, the GRM staff will document the resolution and actions taken. For unresolved grievances, documentation will include:

- Steps undertaken throughout the process
- Communications exchanged with the complainant; and
- Decisions regarding referral or alternative recourse

To ensure accountability and transparency, GRM documentation shall:

- Maintain confidentiality while publishing aggregate statistics on complaints, actions, and outcomes; and
- Be recorded in an electronic database for accurate tracking, learning, and resource planning.

3.9 Timeframes

Table 4 provides the timeframes for grievance redress.

Table 4: Timelines for grievance redress

PROCESS	TIMEFRAME (Working Days)
Registering the grievance in the grievance logbook	within 1 Day
Acknowledgement of receipt and providing feedback	within 2 Days
Assessing the grievance and assigning responsibility	Within 3 days
Development of response	within 7 Days
Implementation of response if agreement is reached	Within 21 working Days
Close grievance	within 30 Days

Compliance with these time limits will be monitored as a GRM performance indicator and reported quarterly, highlighting cases of delay and root-cause analysis.

4.0 Capacity Development and Training

The project will strengthen the capacity of GRM implementers by conducting targeted training programs to enhance the operationalization of the GRM. The training will be provided to project staff including members of the Grievance Task Team as well as the Management Response Committee. The training requirements for the GRM are multifaceted, diverse, and layered across different implementation phases to ensure effectiveness and sustainability. The outlay of the preliminary training program is elaborated in Table 5.

Table 5: Preliminary training programme on GRM implementation

S/N	GR Implementer	Objective
1	Orientation of the Project Staff	Orientation on the Project GRM including the structure and procedure for resolving grievances
2	Training of the Grievance Task Team	To include procedural training on receiving, registering, and sorting grievances; training in management of the grievance redress process (developing flow charts) particularly GBV/SEAH related complaints, assigning roles, monitoring performance of staff dealing with complaints.
3	Orientation of the Management Response Team	Conflict Resolution

5.0 GRM Monitoring, Evaluation & Reporting

Monitoring & Evaluation

GRM Monitoring, Evaluation & Reporting is integrated with the IDEA Project's broader M&E framework. To ensure the Project GRM remains effective and achieves its intended objectives, the project will conduct an annual monitoring and evaluation process to assess overall effectiveness and the impact of the mechanism. The following questions can be addressed in such evaluations:

   i)   How many complaints have been raised? How many complaints were raised by women and men? What is the gender of the alleged perpetrators?
   ii)   What types of complaints have been raised?
   iii)   What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, action being implemented, or resolved)?
   iv)   How long did it take to solve the problems?
   v)   How many aggrieved parties have used the grievance redress procedure? and
   vi)   What were the outcomes?

This will track key outputs and deliverables while assessing the GRM's impact and overall performance. To achieve this, the E&S) Experts with support from the Monitoring and Evaluation expert will assure the quality of the GRM process through:

   (a) Reviewing of logging, tracking and documentation systems, including acknowledgment of receipts and resolution agreements
   (b) Checking that deadlines and timeframes committed to in the mechanism are generally met
   (c) Checking that potentially affected persons and the public are generally aware of the avenues available to channel grievances
   (d) Checking for any variations in time spent and the number of open and closed grievances
   (e) Checking how resolution responsibility is assigned; and
   (f) Checking public/community satisfaction with the process (timeliness, fairness, accessibility, predictability, etc.); and confirming that "resolved" grievances.

A GRM evaluation tool (Table 6) will be used to identify areas that are working well and areas that need improvement. The checklist questions are framed around (1) organisation commitment, and (2) principles for effective GRMs. Data will be gathered using Key Informant Interviews and document reviews.

The GRM will be assessed based on the following Key Performance Indicators:

   (a) Total number and nature of grievances received
   (b) Channels through which grievances were submitted
   (c) Percentage of complaints resolved and unresolved
   (d) Percentage of complaints escalated to mediation
   (e) Resolution timelines for grievances
   (f) Status of unresolved cases
   (g) Provision of stakeholder feedback on the GRM process
   (h) Turnaround time for grievance resolution

(i) Percentage of complainants satisfied with the redress process

Table 6: GRM evaluation tool

Evaluation Criteria	Guiding Questions	Data collection Methods	Actors (Respondents)
1. Organizational Commitment	(a) Do the project's management and staff recognize and value the GRM process as a means of improving and enhancing accountability and transparency? (b) Is grievance redress integrated into the project's core activities? (c) Is grievance redress integrated into staff job descriptions and responsibilities? (d) Is it appropriately resourced and monitored?	Key Informant Interviews (KII), Document Reviews	PCU
2. Principles:			
2.1 Legitimacy	(a) Does the GRM operate independently of interested parties? (b) Is the GRM widely perceived as independent?	KII, FGDs	Stakeholders
2.2 Accessibility	(a) Is the GRM accessible to all stakeholders, irrespective of their language, education or income level? (b) Are procedures to file grievances and seek action easily understood by stakeholders? (c) Can grievances be filed anonymously? (d) Are there a range of contact options? (e) Is the GRM appropriately communicated to stakeholders?	KIIs, FGDS, Document Reviews, observations	Stakeholders
2.3 Predictability	(a) Is the GRM responsive to the needs of all complainants? (b) Does the GRM offer a clear procedure with time frames for each stage and clarity on the types of results it can (and cannot) deliver?	KIIS, FGDs	Stakeholders
2.4 Fairness	a) Are grievances treated confidentially, assessed impartially, and handled transparently /addressed impartially and that affected parties receive a just outcome?	KIIs, FGDS, Document Reviews	Stakeholders
2.5 Rights Compatibility	Are the GRM's outcomes consistent with applicable national and international standards?	KIIs, FGDS, Document Reviews	Stakeholders
2.6 Transparency	(a) Are the GRM's procedures and outcomes transparent enough to meet the public interest concerns at stake? (b) Are the GRM procedures open and understandable, fostering trust and	KIIs, FGDS, Document Reviews	Stakeholders

Evaluation Criteria	Guiding Questions	Data collection Methods	Actors (Respondents)
	accountability?		
2.7 Confidentiality	a) Are complainants' identities protected throughout the grievance process? b) Are grievance records stored securely and accessed only by authorized personnel? c) Are responses communicated privately?	Review of grievance logs and records Interviews with GRM staff Surveys or interviews with complainants	GRM Officers / PIU Staff Complainants / Workers Supervisors / Contractors

Reporting

The Environmental and Social (E&S) Experts will provide regular updates on the progress of the Project's Grievance Redress Mechanism (GRM) implementation. Their reports will cover:

- Dissemination of information through meetings, brochures, and other communication channels; and
- Provide a status of grievance resolutions, presented in the format outlined in Table 7.

These reports will be submitted to the Bank on a quarterly basis, ensuring transparency and continuous assessment of the GRM's effectiveness.

Table 7: Template on status of grievance resolution

(i) Description of issues/complaints received during the reporting period	(ii) Date of receipt (YYY-MM-DD)	(iii) Description of resolution	(iv) Status of addressing issues/complaints

Official Use Only

6.0 Budgeting for GRM Operationalization

To ensure the successful operationalization of the **Grievance Redress Mechanism (GRM),** financial resources must be allocated to the following activities:

- Conducting orientation training and capacity building for the Grievance Task Team and Management Response Committee
- Participation in training and capacity-building sessions for relevant stakeholders
- Designing and printing GRM communication materials (manuals, brochures, and other outreach tools)
- Establishing support infrastructure, including internet connectivity, telephone services, and social media handles for grievance submission and response; and
- Covering costs associated with SEA/SH investigations, ensuring a survivor-centered approach.

7.0 Annexes

Annex 1: Grievance Submission Form-IDEA

Full Name

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

FirstName:……………………………………………………………………………

Last Name:……………………………………………………………………….

☐ I wish to raise my grievance anonymously

☐ I request you not to disclose my identity without my consent

Contact Information

Please mark how you wish to be contacted

☐ By Post, provide mailing address………………………………………………

☐Telephone…………………………………………………………………………

☐ Email………………………………………………………………………………

☐ Other………………………………………………………………………………..

Preferred Language of Communication

……..

Description of the complaint

What happened? Where did it happen? Who did it happen to?, What is the result of the issue/incidence?

……

……

……

……

……

……

……

……

……

……

……

……

Category of complainant (tick appropriate)

☐ Affected Person
☐ Mediator for the Affected Person
☐ Civil Organisation/Service Organisation
☐Other
(Specify)……………………………………………………………………………………………………
……………

Date of incidence/Grievance:
☐ One time grievance/incident (Date…………………………………)
☐ Happened more than once (How many times……………………..)
☐ Ongoing, currently experiencing problem

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

What has been pursued/done in the past to resolve the issue, if any

……
……
……
……
……………………………………

Signature ....Date……………………………………….

Please return this form to: grmidea@comesa.int

Annex 2: Grievance Log sheet – PCU

Tracking #	Name of Complainant	Contact Details	Description of Complaint	Date Received	Channel Grievance Received (Suggestion Box; Toll-free Line, email, letter etc.)	Unit/ contractor complained of	Risk priority index	Location	Gender	Action taken/agreed resolution	Feedback given y/n?	Outcome	Date grievance closed

Annex 3: Acknowledgement of Receipt Form

Note: This acknowledgment will be issued in one of the official COMESA languages. If the grievant has not selected one of the official languages, a translation will be provided in their preferred language.

Dear _____ Grievance tracking no: ###/FY
Formal Grievance Acknowledgement **Acknowledgment of Grievance Receipt** We acknowledge receipt of your formal grievance, submitted **[by email, in person, or by phone]** to **[Staff Name], [Title]**, on **[Date]**. Your case is currently under review, and you will receive a response regarding the resolutions or actions taken within **30 days**. During this period, we may reach out for additional information if necessary. For any inquiries or updates, please feel free to contact us at **[Phone Number]**, or reach out to any **Project staff member** for assistance.
Receipt issued by: Name: _____ Signature (if submitted hard copy): _____ Date: _____

Annex 4: SEA/SH Complaint Form

Name of Complainant: _____ Ethnic origin/Nationality: _____

Address/Contact details: _____ Identity no: _____

Age: _____ Sex: _____

Name of Victim (if different from Complainant): _____ Ethnic origin/Nationality:_____

Address/Contact details: _____ Identity no: _____

Age: _____ Sex: _____

Name(s) and address of Parents, if under 18: _____

Has the Victim given consent to the completion of this form? □ YES □ NO

Date of Incident(s): _____ Time of Incident(s): _____ Location of Incident(s): _____

Physical & Emotional State of Victim (Describe any cuts, bruises, lacerations, behaviour, and mood): _____

_____

_____

Witnesses' Names and Contact Information: _____

_____

_____

Brief Description of Incident(s) (Attach extra pages if necessary): _____

_____

_____

_____

_____

_____

Name of Accused person (s): _____ Job Title of Accused person(s): _____

Organization Accused person(s) Works For: _____

Address of Accused person(s) (if known): _____

Age: _____ Sex: _____

Physical Description of Accused person(s): _____

_____

_____

Have the police been contacted by the victim?   □ YES □ NO   If yes, what happened? _____

_____

_____

If no, does the victim want police assistance, and if not, why? _____

_____

Has the victim been informed about available medical treatment? □ YES □ NO

If Yes, has the victim sought Medical Treatment for the incident? □ YES   □ NO

If Yes, who provided treatment? What is the diagnosis and prognosis? _____

_____

What immediate security measures have been undertaken for victim? _____

_____

_____

Who is responsible for ensuring safety plan (Name, Title, Organisation): _____

Any other pertinent information provided in interview (including contact made with other Organisations, if any): _____

_____

Details of referrals and advice on health, psychosocial, legal needs of victim made by person completing report: _____

_____

_____

Report completed by: _____
            Name   Position/Organization   Date/Time/Location

Has the Complainant been informed about the Organization's procedures for dealing with complaints? □ YES   □ NO

Signature/thumb print of Complainant signaling consent for form to be shared with relevant management structure:

_____

Complainant's consent for data to be shared with other entities (check any that apply): _____

Police □   Health Care Centre (name) □ _____   L e g a l Services Agency □ _____

Other (Specify) □_____

Date Report forwarded relevant management structure*: _____

Received by relevant management structure*: _____ _____ _____
                Name   Position   Signature

(*Relevant management structure is the official(s) responsible for sexual exploitation and abuse issues in the Organisation where the Accused person works)

ALL INFORMATION MUST BE HELD SECURELY AND HANDLED STRICTLY IN LINE WITH APPLICABLE REPORTING AND INVESTIGATION PROCEDURES

Official Use Only